

SUFFOLK ENERGY ACTION SOLUTIONS'
REBUTTAL TO NGET'S RESPONSE TO SEAS RR
AIR QUALITY

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 2 December 9, 2025

Date: 9 December 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 2.58 SEAS- Air Quality

Introduction

SEAS has reviewed the Applicant's responses in [REP1A-043](#) Table 2.58 Air Quality and submits that none of the substantive issues raised in SEAS [RR-5210](#) have been resolved. The Applicant presents no new evidence, relies entirely on previously submitted documents, and does not remedy the core deficiencies in their response.

SEAS refers to its earlier submission RR-5210 and sets out below a summary of its principal outstanding concerns.

1. Dust Risk and Mitigation

The Applicant confirms a high dust risk to residential and designated ecological receptors but still provides no enforceable dust limits, no PM_{2.5} or NO₂/NO_x thresholds, and no clear action protocols. Mitigation remains generic and non-binding. This does not satisfy EN-1 or the EIA Regulations.

2. Model Underprediction

The dispersion model required a verification factor of 3.79, showing severe underprediction of NO₂. The Applicant provides no explanation, sensitivity testing, or additional verification. Model uncertainty remains unresolved, undermining confidence in all predicted concentrations.

3. Mitigation Not Enforceable

The CEMP, REAC and Outline Air Quality Management Plan contain only high-level commitments. The Applicant introduces no binding limits, no trigger levels, and no enforceable response measures. This falls short of policy expectations for nationally significant infrastructure.

4. Cumulative Impacts Across NSIPs Not Quantified

The Applicant confirms that cumulative assessment across Sizewell C, EA1N, EA2, LionLink and Sea Link is qualitative only. No cumulative emissions modelling has been undertaken for dust, vehicle emissions, NRMM or generators. This is a fundamental evidential gap given the scale of overlapping works.

5. NRMM and Generator Emissions Unquantified

The Applicant still provides no numerical emissions estimates for Non-Road-Mobile Machinery (NRMM) or backup generators, relying instead on professional judgement. These omissions are not credible for a high-risk, multi-year construction programme.

6. No Operational Air Quality Assessment

Despite EN-1 requiring assessment of *all* project stages, the Applicant provides no operational emissions modelling and no quantification of backup generator emissions. The omission remains unjustified.

7. Policy Compliance Not Demonstrated

The Applicant asserts compliance with EN-1, the EIA Regulations and the Air Quality Standards Regulations, but without resolving the missing data, major modelling uncertainties, or lack of enforceable mitigation. Compliance is claimed, not evidenced.

Conclusion

SEAS submits that the Applicant's responses do not resolve any of the air-quality issues SEAS identified. Key assessments remain incomplete, unverified, or unquantified, and mitigation lacks enforceability.

SEAS respectfully asks the Examining Authority to require:

1. Full quantitative cumulative air-quality modelling, including all overlapping NSIPs.
2. Quantified NRMM and generator emissions assessments.
3. A complete operational-phase air-quality assessment.
4. A revised, enforceable Air Quality Management Plan with defined thresholds and actions.
5. Further verification or sensitivity testing to address the model's significant underprediction.

Until the Applicant supplies this information, the application does not meet the requirements of EN-1, the EIA Regulations, or the Air Quality Standards Regulations and should not be granted development consent.

Thank you for your consideration.