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

AGRICULTURE & SOIL

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 2.56 SEAS- Agriculture and Soil

1. Introduction and Summary

SEAS welcomes the Applicant's detailed response REP1A-043 Table 2.56 SEAS-Agriculture and Soil to our Relevant Representation RR-5210.
However, upon close review, it is clear that several core matters remain inadequately addressed, and in some cases the Applicant's responses introduce new uncertainties, rely on incomplete evidence, or present assurances unsupported by data.

The aim of this rebuttal is to clarify where the Applicant's explanations fall short of providing the Examining Authority with the reliable information required under the Planning Act 2008, the EIA Regulations 2017, and NPS EN-1/EN-5.

The following sections provide a considered analysis, mindful of the need to protect nationally significant agricultural land.

2. Reliability of BMV Land Loss Figures

The Applicant asserts that permanent BMV loss totals 23.66 ha, but this figure is derived entirely from predictive mapping, which both Natural England and the Applicant acknowledge is indicative only.

SEAS notes that the Applicant rejects the 50.7 ha figure cited in our representation, yet provides no field-survey data to verify its own calculation.
Without ground-truthed ALC surveys, the true extent of BMV land affected remains unresolved.

It is therefore difficult for the Examining Authority to place confidence in the revised BMV totals offered by the Applicant at this stage.

3. Timing of ALC Surveys and Implications for Assessment

The Applicant confirms that full ALC surveys will not be undertaken until Autumn 2025. This means that the Examination must proceed—and potentially a decision reached—before the critical baseline information exists.

The ES therefore continues to rely on assumptions rather than verified soil classifications. These surveys are not minor refinements; they underpin the core assessment of agricultural impact and the feasibility of soil reinstatement.

SEAS maintains that essential data cannot be deferred until post-consent without undermining the integrity of the assessment.

4. Drainage and Irrigation Infrastructure – Commitments Without Evidence

The Applicant references Requirement W10/AS05 and offers reassurance that existing drainage systems will be reinstated. However, no survey information is provided to identify:

- the location of current field drains,
- their condition,
- their depth,
- or their hydrological function.

Absent this information, reinstatement is more an intention than a demonstrable capability.
If the existing infrastructure is not understood, there is no basis to confirm that it can be reinstated effectively.

SEAS does not dispute the Applicant's willingness, but notes that a commitment without underlying evidence cannot properly address the risk to long-term agricultural productivity.

5. Soil Management Plan – Lack of Measurable Outcomes

The Applicant highlights new details in the Soil Management Plan (SMP), including training, monitoring, wet-weather cessation procedures, and an aftercare period.

However, these measures do not include measurable restoration outcomes, such as:

- target bulk density,
- organic matter content,
- drainage capacity,
- or the ALC grade to be achieved post-works.

Without explicit standards, it is unclear how reinstatement success will be assessed or enforced.

The SMP therefore remains largely procedural rather than performance-based, leaving unresolved whether BMV soils can be returned to productive condition within a realistic timeframe.

6. Thermal Effects of HVDC Cables Beneath Agricultural Land

SEAS raised the issue of long-term soil heating from 2 GW HVDC cables.
In response, the Applicant emphasises that thermally suitable backfill will be used and cites a single external study suggesting limited heating effects.

However:

- No cable-specific thermal modelling has been carried out for Sea Link.
- No projections are provided for temperature changes in the soils along the route.
- No consideration is given to how BMV soils may respond differently to elevated temperatures or moisture changes.

The Applicant's reliance on general statements rather than project-specific analysis leaves important questions unresolved.
Given the scale of BMV land affected, the absence of modelling is a notable omission.

7. Cumulative Agricultural Impacts

The Applicant refers to a separate cumulative effects chapter (APP-060) and suggests that cumulative considerations are therefore adequately covered.

However, cumulative agricultural impacts are not addressed within the agriculture chapter, and the Applicant confirms that the combined BMV loss from Sea Link and other NSIPs remains "significant".

This conclusion is reached without:

- any cumulative analysis of soil quality degradation,
- any assessment of combined drainage disruption, or
- any evaluation of the cumulative impact on the viability of agricultural holdings.

Given the concentration of energy infrastructure in East Suffolk, SEAS submits that a more integrated assessment is required.

8. Compulsory Acquisition – Limited Consideration of Agricultural Viability

The Applicant cites several routeing and design evolution reports to justify compulsory acquisition.
However, none of these documents:

- assess the operational impact on affected farms,
- evaluate severance,
- consider access disruption, or
- examine whether smaller areas of permanent infrastructure could be sited on lower-quality land.

The Applicant places considerable reliance on the existence of compensation mechanisms.
Compensation, however, does not substitute for the statutory test of necessity, nor does it address long-term loss of productive capacity to the region.

9. Overarching Concern: Heavy Reliance on Future Work

Across several areas—ALC surveys, drainage surveys, thermal modelling, detailed SMP design—the Applicant indicates that important information will be developed during the detailed design stage, after consent is granted.

This approach sits uncomfortably alongside the Applicant's assertion that the ES is sufficient for Examination.
SEAS believes it is not possible for the Secretary of State to reach a sound conclusion on agricultural harm while key evidence remains unavailable.

10. Conclusion

SEAS acknowledges the Applicant's attempt to provide further clarification in response to our Relevant Representation. However, the fundamental issues remain unresolved. Core aspects of the assessment continue to rely on assumptions, deferred evidence, or generalised commitments lacking the detail needed for meaningful scrutiny.

The protection of nationally important agricultural land requires a robust, evidence-based approach.
SEAS therefore invites the Examining Authority to consider whether the Applicant has provided a sufficiently secure basis for assessing agricultural impacts and whether essential information has been deferred until after consent in a manner inconsistent with the requirements of good EIA practice.

SEAS respectfully submits that these matters must be satisfactorily addressed before Development Consent can properly be granted.