The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.69: Applicant's Written Response to Open Floor Hearing 1

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1. About This Document

1.1 Introduction

- This document provides the Applicant's written response to the oral submissions made by Interested Parties at Open Floor Hearing 1, held in Suffolk between Wednesday 5 November and Thursday 6 November 2025, in relation to the Sea Link Project ('the Proposed Project').
- The hearing was split into five sessions across the two days, and commenced and concluded at the following times:
 - Session 1, Wednesday 05 November: Start 2.00pm, closed 4.37pm
 - Session 2, Wednesday 05 November: Start 5.30pm, closed 7.16pm
 - Session 3, Thursday 06 November: Start 10am, closed 12.38pm
 - Session 4, Thursday 06 November: Start 2.00pm, closed 4.15pm
 - Session 5, Thursday 06 November: Start 5.30pm, closed 6.37pm
- 1.1.3 The Applicant did not provide any oral submissions during the Open Floor Hearing 1, but did attend all of the hearings.
- Alongside this document, the Applicant has submitted a separate document responding to the issues raised at Open Floor Hearing 2 that was held in Kent from Tuesday 11 November 2025 to Thursday 13 November 2025.

1.2 Scope of this Document

- The Preliminary Meeting and the subsequent Open Flood Hearing 1 were held between 5 November and 6 November in Suffolk.
- 1.2.2 Whilst the Applicant was not asked to provide any responses to submissions at the Open Floor Hearings, it attended all hearings to listen to the representations made by the interested partes.
- The Applicant took notes of all the points raised and in providing this response has cross-referenced these notes against the recordings and transcripts of the hearing sessions subsequently published on the Planning Inspectorate website [EV4-002 EV4-017] to ensure accuracy and full understanding of the points raised.
- In addition to the oral submissions, made in-person at the Open Floor Hearings, 208 written summaries of oral submissions made at hearings held during w/c 3 and w/c 10 November 2025 were published on the Planning Inspectorate website [REP1A-001 to REP1A-208]. A number of further Written summaries of oral submissions were subsequently published as late submissions on the Planning Inspectorate website. The Applicant can confirm that all these submissions have been reviewed and that this document also comprises the Applicant's Response to matters in those written summaries. This is in accordance with the Examining Authority's Procedural Decision set out in the Rule 17 Letter [PD-014] dated 28 November 2025.

1.3 Approach and methodology

- In responding to the submissions made at the Open Floor Hearing 1, the Applicant ha adopted a topic-based thematic approach.
- All representations, both oral and written, have been thoroughly reviewed, and the key themes have been distilled from the notes, transcripts, recordings and written submissions. This response document aims to provide a proportionate response, focussing on the substance of the issues raised. By grouping related points together, this approach aims to deliver a comprehensive response to the matters discussed, avoiding unnecessary repetition and ensuring clarity for all interested parties.

1.4 Topics raised in oral submissions

- Oral and written submissions have been categorised under the following themes and are responded to in alphabetical order:
 - Agriculture and Soils
 - Alternative options (specific)
 - Alternative solutions (including offshore grid)
 - Bridge over River Fromus
 - Change application consultation
 - Community benefits
 - Concerns about Landfall location
 - Construction traffic impacts
 - Cultural Heritage
 - Design
 - Emergency services
 - Environmental policy and legislation
 - Flood risk
 - Impact on bird species
 - Impact on National Landscape
 - Impacts on habitats and Protected Sites (including SSSI, SAC, SPA, Nature Reserves)
 - Local economy
 - Mental health and wellbeing
 - Noise impacts
 - Other
 - Public rights of way
 - Sea Link Project

- Security
- Strategic planning for energy infrastructure
- Tourism impacts
- Traffic surveys and assessment
- Section 2.1 presents written responses to the topics that have been addressed under the broader themes that are listed above. In addition, Section 2.2 provides direct responses to factual errors that the Applicant considers it necessary to rebut.
- 1.4.3 It is noted that as part of their written submissions, a number of interested parties included additional information in the form of maps, photographs and document extracts. This supplementary information has been reviewed and considered by the Applicant in its response.

2. Applicant's Written Response to Open Floor Hearing 1

2.1 Applicant's Response to Oral and Written Submissions – Thematic Responses

Table 2.1 Applicant's response by theme

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
Agriculture and Soils		
Impacts on farmland / agricultural businesses were identified, including: • residual impacts from archaeological trial trenching and soil destruction; • loss of high value agricultural land and crops; and • the disruption of the local workforce.	A comprehensive assessment of impacts on agriculture, soils, and Best and Most Versatile (BMV) land has been undertaken and is detailed in Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]. The assessment is based on the design presented in Application Document ES 6.2.1.4 (C) [AS-093] and confirms that the majority of agricultural land within the Order limits will only be affected temporarily during construction. Land required for underground cables and temporary working areas will be reinstated to its previous condition post-construction, allowing farming operations to resume. Soil handling will follow best practice measures set out in the Outline Soil Management Plan [APP-354], ensuring soil integrity and minimising long-term impacts. Permanent loss of agricultural land is limited to 11.45 hectares of BMV land, due to the construction of the Suffolk Onshore Scheme, of which the majority is lost due to the construction of the new converter station is constrained to within 5 km of the consented Friston Substation, and despite efforts to minimise impacts, no alternative site with lower-quality land was feasible. A predictive mapping exercise has been carried out to assess this impact which will be verified by the results of ongoing Agricultural Land Classification. Embedded mitigation measures, including those in the Outline Code of Construction Practice [APP-341] and Register of Environmental Actions and Commitments [APP-342], will further reduce effects on agricultural and soil receptors, in line with NPS EN-1 paragraph 5.11.14. Where productive land is permanently lost, this impact must be balanced against the urgent national need (categorised as a 'Critical National Priority in the National Policy Statements) for the Proposed Project, which supports the UK's British Energy Security Strategy and Net Zero commitments. The Applicant will work closely with landowners and tenants to minimise disruption, agree accommodation works, and manage construction schedules. Compe	Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils (Clean) [PDA-019] Application Document ES 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093] Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]
Alternative options (specific)		
Site selection of Saxmundham Converter Station site. IPs required justification on why the site was selected. Consideration of alternative options were	The site selection process for the Saxmundham Converter Station is detailed in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study [APP-368]. Leiston Airfield and other alternatives were considered but discounted due to technical, environmental, and land use constraints. The selected site best meets the project's requirements	Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study [APP- 368

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
raised including Leiston Airfield, located adjacent to Sizewell C Link Road.	as is explained in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study [APP-368].	
	Despite Leiston Airfield being in use as an airfield during, and for a period of time after, World War II (and being considered a non-designated heritage asset for this reason), the majority of the site has long since returned to arable use. The National Planning Policy Framework (NPPF), in its definition of 'previously developed' (brownfield) land, specifically excludes "land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape".	
Alternative solutions		
Alternative offshore solutions / offshore converter station platforms were raised. Examples from European countries (Belgium, Netherlands, Germany) were provided. IPs considered that these options have not been fully considered by the Applicant. The example of EA3 Offshore Wind Farm was given, where an offshore platform has been completed recently. Speakers raised that an offshore solution is a cheaper alternative.	The suggestion that offshore solutions have not been fully considered by the Applicant is incorrect. While the concept of an "offshore grid" often refers to pooling multiple offshore wind farms to reduce onshore infrastructure, this is a broader network design issue outside the remit of Sea Link or National Grid Electricity Transmission (NGET). Importantly, this concept was comprehensively assessed by the National Energy System Operator (NESO) through its Holistic Network Design (HND) in 2022. The HND concluded that the optimal approach combines coordinated and radial connections, and Sea Link was identified as a critical element of this design through the ESO's Network Options Appraisal (NOA) process. It is misleading to suggest that an offshore grid eliminates onshore infrastructure. All offshore generation must ultimately connect to the onshore network, and pooling power offshore often increases the number of cables and converter stations required. For example, TenneT's offshore grid proposals in Germany and the Netherlands involve 14 HVDC projects, each requiring three landfall cables and an onshore converter station, resulting in at least 21 cables and 14 stations, plus additional onshore reinforcements. Technical constraints further limit feasibility; there are no commercially available DC circuit breakers, meaning offshore DC networks cannot exceed 1,800 MW without risking system stability. Environmental, shipping, and spatial constraints offshore compound these challenges, all of which were factored into the HND's coordinated design. Sea Link's potential offshore interaction with North Falls and Five Estuaries wind farms was rigorously examined under the Offshore Coordination Support Scheme (OCSS) between 2022 and 2024. The outcome showed that offshore coordination would undermine Sea Link's ability to meet its needs case and require additional reinforcements, resulting in more onshore infrastructure, not less. Offshore alternatives have been fully explored at both strategic and project levels, and th	
Alternative brownfield solutions were raised which some Speakers considered were located closer to demand in the south-east.	Due to the land use of the Proposed Project study area defined by the connection points (see Action Point 1 (AP1): Need Case Summary in 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124], there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements. Brownfield sites, such as those at Bradwell-on-Sea, Tendring, and the Isle of Grain, would not provide a nearby network connection point that would meet the needs case for the Proposed Project. There is no needs case to develop network reinforcements into these areas in the way suggested, and irrespective of this, the network constraints in East Anglia and the South East would remain unresolved. These are not technically feasible alternatives.	Application document 7.3 Design Development Report [APP-321] Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367] Action Point 1 (AP1) in 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]

Speakers raised concerns about the landfall location of the Proposed Project in Suffolk including:

- Landfall at Aldeburgh and North Warren Nature Reserve.
- Destruction of beach at landfall. Impacts on enjoyment for local residents and visitors.
- Distrust in the commitment for underground cabling / HDD and concerns about there being, open trenching

The Proposed Project is only seeking consent for trenchless techniques at the landfall, not open cut. It is not the Applicant's intention to use open cut techniques and it would not be legally possible to 'fall back' to a position of open trenching under the DCO as applied for.

The feasibility of the Sea Link conceptual trenchless (HDD) design is assessed in **Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]**. The methodology for the landfall is assessed as suitable, with key geotechnical and construction risks identified.

Commitment W12 within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] secures that the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences in order to prevent any increased likelihood of defence breach and subsequent seawater incursion.

The use of trenchless techniques means that there would be no requirement for plant to operate on the shingle ridge at the Suffolk landfall. There would therefore be no potential for weakening of the natural storm ridge and no increased risk of seawater incursion due to construction activities associated with the Proposed Project. Furthermore, the trenchless construction approach includes going under RSPB North Warren. The ES concludes that there will be no effects of trenchless construction on surface features and negligible risk of frac out within the reserve. Geophysical surveys and ground investigation boreholes with in-situ and laboratory testing along the route have provided a detailed ground model along the HDD route. This, along with previous experience in similar conditions show that the proposed HDDs at the location are entirely feasible.

The Applicant has provided further detail at **Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037],** response to AP16, providing an explanation about horizontal directional drilling (HDD) in relation to Sea Link.

Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]

Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]

Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037]

Construction traffic impacts

Topic/Theme raised by Speakers

A significant number of speakers raised concerns about traffic impacts arising cumulatively with other projects including Sizewell C, LionLink and the SPR EA1N and EA2 windfarm projects. These concerns related to:

(1)Impacts arising from construction workforce in the area, considered cumulatively with other projects, traffic impacts, road safety and increased litter.

Applicant's Response

The cumulative assessment (6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) considers the combined impacts of construction workforces from multiple projects. The assessment concludes that, with embedded mitigation and management measures, significant cumulative effects on traffic, road safety, and local amenity are unlikely. The Applicant will implement measures to manage workforce behaviour, including litter control.

Construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008].

Construction phase transport effects (including with respect to Driver Delay) are assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. This demonstrates that with the identified mitigation in place (to be secured by the aforementioned management plans), the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay).

Relevant DCO Application documents

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]
Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]

Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]

(2) Impacts resulting from congestion on the road network, including:

- Increased travel times;
- Rat running
- Road closures and diversions
- HGVs being diverted through inadequate routes
- (3) Construction traffic from other projects

The potential impact of construction traffic on the surrounding highway network has been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** based on the peak construction phase of the Proposed Project. This includes an assessment of various criteria including severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay, road safety, hazardous/ large loads and Public Rights of Way (PRoW) diversions and closures.

Driver delay and impacts such as access to health care and employment is recognised as a significant concern. The effects of the Proposed Project have been assessed in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054],** which has been informed by careful assessment of the sensitivity (i.e. the magnitude of change) at receptors, such as junctions, to changes in traffic associated with the Proposed Project. This assessment concludes that the effect of the Proposed Project not likely to be significant based on the sensitivity levels and small/negligible magnitudes of impact identified for these receptors.

The construction vehicle routing has been designed to minimise impacts across the highway network, and Heavy Goods Vehicles (HGVs) will avoid passing through Snape and Thorpeness, as shown by the HGV routing plan within Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]. The A1094 / B1122 roundabout geometry was considered in the EA1N/EA2 examination, and the Applicant has committed to minimising the volume of HGV and staff vehicles associated with the construction phase, as far as reasonably practicable, as the majority of construction traffic will access the landfall location via the new haul road which will be constructed. The traffic and transport assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] concludes that, with the management and mitigation identified within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] and Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] that there is not expected to be the potential for any significant effects as a result of construction traffic associated with the Proposed Project.

The main access routes for the Proposed Project during construction will primarily use the A12 and B1121 Main Road for access S-BM09, and the A12, A1094, and B1069 Snape Road for accesses S-BM03 and S-BM04, accommodating approximately 97% of all construction vehicle trips. This routing strategy is designed to avoid constrained villages such as Friston, Aldringham, Sternfield, and Knodishall, and to minimize use of less suitable routes including the B1122

Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234].

Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]

Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]

Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]

Preliminary Highway Impact Assessment [APP-129

Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1119 Church Street (via Saxmundham), and Grove Road. As shown in Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234], all construction vehicles will avoid Sternfield and Knodishall, with Aldringham limited to cable drum abnormal loads managed under measures in the Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]. A maximum of nine vehicles per hour and fewer than 30 peak daily trips are expected along B1121 Saxmundham Road through Friston for overhead line tower access (S-BM11), as detailed in the Preliminary Highway Impact Assessment [APP-129]. Potential constraints identified in Table 6.2 of [APP-337], similar to those noted for EA1N/EA2, will be addressed through mitigation secured under Requirement 6 of the Draft Development Consent Order [AS-043], following consultation with Suffolk County Council ('SCC') Highways.

Construction working hours

Speakers raised concerns about construction working hours including the lack of respite for local communities and complaints that the Applicant is not committed to working under the approved SPR DCO working hours.

Construction working hours for Sea Link are set out in the application documents and are subject to control through the Development Consent Order. The Applicant has considered local circumstances and feedback in setting proposed working hours and will continue to engage with stakeholders to minimise disruption.

The Applicant acknowledges concerns regarding working hours but would seek to emphasise that the proposed hours are intended to provide flexibility to carry out works when and where needed. The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path.

It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted. The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including Sea Link, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030. Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].

Furthermore, the Applicant is working with the host authorities to consider whether there are specific elements of the Proposed Project where further restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in **Application Document 3.1 draft Development Consent Order [AS-012]** with the working hours secured in the SPR EA1N and EA2 DCOs.

This is recognition of the fact that these works would only be implemented in a Proposed Project scenario 2, a fallback scenario in which the Applicant would in effect be delivering works that are expected to be delivered under the SPR consents. The scenario 2 would only occur if the SPR projects do not proceed in the way expected (i.e. on-programme or at all), and the National Grid substation is therefore constructed under the Proposed Project consent rather than an SPR consent.

Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]

Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)

Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].

Cultural Heritage

Speakers raised concerns about impacts on Cultural Heritage. Specific mention was made of Hurts Hall and St Johns Church The Applicant considers that the cultural heritage assessment of impact through changes to setting presented in Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109], Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and Application Document 7.1 (C) Planning Statement [AS-057] is an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects.

Paragraphs 3.9.105-3.9.116 of Application Document 6.2.2.3 Cultural Heritage [APP-050] concludes a moderate adverse effect on Hurts Hall at Year 1 of operation, which is significant. Table 3.13 of [APP-050] indicates that by Year 15, once planting and screening have matured, the effect would reduce to minor adverse and not significant. Paragraphs 7.5.32-7.5.33 of Application Document 7.1 (C) Planning Statement [AS-057] confirm that the harm is less than substantial at the lower end of the scale, and Paragraph 7.5.7 of [AS-057] acknowledges the 'great weight' given to heritage conservation. Ultimately, Paragraph 7.5.56 of [AS-057] concludes that this harm is outweighed by the substantial public benefits of the Proposed Project.

The Church of St John the Baptist (Grade II*, NHLE1268184) is assessed within the Saxmundham Conservation Area due to its shared setting and group value with Hurts Hall, as detailed in **Application Document 6.2.2.3 Cultural Heritage [APP-050]** and supplemented by **Application Document 9.44 [REP1-118]**. The church, of high heritage value, retains significant medieval and 15th-century architectural features and sits within a mature, tree-lined churchyard that limits views from the wider area. The Proposed Project would introduce above-ground elements such as the Saxmundham Converter Station and Fromus Crossing into some approach views from the south on the B1121, but these would not interrupt or compete with views of the church tower, nor alter its immediate setting. Other key aspects of its setting, including its relationship with Hurts Hall and the churchyard, remain unchanged. At Year 1 of operation, the impact is assessed as negligible in magnitude, equating to a minor adverse effect that is not significant.

Mitigation measures, including planting and screening set out in the Outline Landscape and Ecological Management Plan [AS-059], will further reduce visual change. By Year 15, once planting matures, the residual effect is assessed as neutral and not significant. While the Heritage Impact Assessment submitted with the Relevant Representation suggests a moderate adverse impact, it concurs with Paragraph 6.6 of the Heritage Impact Assessment and Paragraph D.3.6 of the Planning Statement [AS-057] that the harm is 'less than substantial' at the lower end of the scale and temporary. Paragraph 7.5.7 of [AS-057] acknowledges the great weight afforded to heritage conservation, but Paragraph 7.5.56 of [AS-057] concludes that this limited harm is outweighed by the substantial public benefits of the Proposed Project.

Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]

Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 [APP-050] and Application Document 9.44 [REP1-118] Application Document 7.1 (C) Planning

Outline Landscape and Ecological Management Plan [AS-059]

Statement [AS-057]

Cumulative Impacts

Speakers raised concerns about the large number of infrastructure projects which are located in Suffolk (completed, under construction, subject to consultation)

The assessment of inter-project cumulative effects was undertaken in accordance with the Planning Inspectorate's guidance. There is naturally overlap between the Proposed Project and EA1N and EA2 west of the B1069 on the approach to the Friston (Kiln Lane) Substation site, as all three projects will connect into the same substation; this is unavoidable. However, there is a spatial separation between the cable routes for much of their length and the projects make landfall approximately 2 km apart. So, although a project may be screened in due to overlap in the Zone of Influence, it may only relate to a small part of the project, with the remainder having no potential for cumulative effects.

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] Application Document 7.10 Coordination Document [APP-363]

Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054].

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	In addition to cumulative effects associated with the development of new infrastructure the cumulative assessment (6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) considers the combined impacts of construction workforces from multiple projects. The assessment concludes that, with embedded mitigation and management measures, significant cumulative effects on traffic, road safety, and local amenity are unlikely. The Applicant will implement measures to manage workforce behaviour, including litter control.	
	Similarly, in terms of transport, construction phase transport effects (including with respect to Driver Delay) are assessed within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] . This demonstrates that with the identified mitigation in place (to be secured by the aforementioned management plans), the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay).	
Speakers made representations in regards to the impacts from the construction of Sizewell C.	The cumulative assessment considers the potential for overlapping impacts from Sizewell C and other major projects. While there is some temporal overlap in construction programmes, the spatial overlap is limited, and peak activities are unlikely to coincide for extended periods. The assessment concludes that, with embedded mitigation and management measures, significant cumulative effects from traffic, dust, noise, and ecological disturbance are unlikely. However, significant cumulative effects are considered likely in relation to Agriculture and Soils. Each project is required to comply with planning and environmental controls to manage these impacts.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]
Speakers also considered that LionLink and Sea Link cannot be considered in isolation.	No part of Sea Link is functionally dependent upon LionLink. Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effect [APP-059] includes an assessment of cumulative effects, where it is possible to do so. While LionLink has not yet published any detailed information on its potential environmental effects, it due to publish its PEIR in January at which point it will be possible to update the Cumulative Effects Assessment. Document 6.6 (B) Habitats Regulations Assessment Report [AS-007] considers the potential for in combination effects with LionLink in paragraphs 5.2.7 to 5.2.11 and paragraph 8.2.8, based upon the information available.	Application document 7.3 Design Development
	The cumulative assessment includes LionLink as a relevant project and considers its potential combined effects with Sea Link. The assessment is proportionate to the information available for LionLink at the time of submission.	Report [App-321]
	Coordination between projects is encouraged by the NPSs (EN-1, EN-3 and EN-5), which advocate the importance of coordination when considering the location and route of onshore and offshore transmission infrastructure.	
	NGET was strongly encouraged to explore opportunities for coordinating with the two NGV projects in stakeholder feedback throughout the pre-application stages of the project, including from East Suffolk Council (ESC) and Suffolk County Council (SCC).	
	The Applicant has developed its project in a coordinated manner with (amongst other developers) NGV. This is set out in detail in Application document 7.10 Coordination Report [App-363].	
	This included a review of potential converter station sites undertaken alongside the NGV Nautilus project prior to the Sea Link non-statutory consultation in 2022, which jointly reconsidered converter station sites identified independently by NGET and NGV for their potential to co-locate up to three converter stations in a coordinated manner. Following further review, assessment, and consultation, the proposed converter station site at Saxmundham was identified as being suitable for both Sea Link (as a standalone project) and up to two further	

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	converter stations. This is set out in Application document 7.3 Design Development Report [App-321] and Application document 7.10 Coordination Report [App-363], with further detail of the early site finding exercise undertaken alongside the NGV Nautilus project set out in Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]. These documents make clear that the suitability of the proposed Saxmundham converter station site is not dependent on whether one, two, or three converter stations are developed there, although it does offer the potential for a multi-project co-location strategy to be explored. The Applicant has back checked its decision making in an ongoing way throughout the development of the Proposed Project, to ensure that it remains comfortable with its decision making in the context of up-to-date information.	
One Speaker considered that Scottish Power was acting as 'Trojan horse' for National Grid, during the previous examination of the EA1N and EA2 DCO applications in relation to the consenting of the National Grid substation as part of the EA1N and 2 projects.	(North) and East Anglia Two windfarm projects and is also the network connection point for the Proposed Project. As the substation is an essential component of the East Anglia One (North), East Anglia Two, and Sea Link projects, it was included in all three applications. A substation on its own is not however a nationally significant infrastructure project (NSIP), nor has consent been sought for it in isolation of these three DCOs. Despite the substation benefitting from consent pursuant to two different extant DCOs, and being included in the application for the Proposed Project, it will only be delivered once under	Application Document 7.10 Coordination Document [APP-363]
	one of these three consents The Applicant's approach to coordination and site selection is set out in the Application Document 7.10 Coordination Document [APP-363]. Coordination with other projects, including those promoted by Scottish Power Renewables, has been undertaken in response to policy and stakeholder feedback. Each project is subject to its own examination and consent process.	
Speakers made representations in regard to the "Connection Hub" at Friston. Comments included concerns about the location of the connection hub and the consenting approach.	The Friston Substation would act as a connection point for multiple projects, including Sea Link, EA1N, and EA2. The cumulative assessment considers the combined effects of these projects at this location, including landscape, visual, noise, and traffic impacts. Mitigation measures are embedded to minimise adverse effects, and the assessment concludes that, with these measures, significant cumulative impacts are limited.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter- Project Cumulative Effects [APP-060] Application Document 7.10 Coordination Document [APP-363]
	Reiterating the points made by the Applicant in response to other points made during OFH1, Kiln Lane substation is required to provide the network connection for the consented SPR windfarm projects and will be the network connection point for the Proposed Project. As the substation is an essential component all three projects it was included in all three applications. A substation on its own is not however a nationally significant infrastructure project (NSIP), nor has consent been sought for it in isolation of these three DCOs.	
	Despite the substation benefitting from consent pursuant to two different extant DCOs, and being included in the application for the Proposed Project, it will only be delivered once under one of these three consents	
	For economic and efficiency reasons, National Grid would always seek to connect into an existing substation rather than build a new substation. Given that the Friston Substation was included in the SPR EA1N and EA2 DCO applications, which have subsequently been consented, it was entirely logical to plan to connect into this substation rather than seeking consent for a separate substation, presumably within or very close to the Suffolk Coast and Heaths AONB.	
Speakers raised the recent announcement of the Suffolk Water Recycling Transfer & Storage Project. Recent, and its proximity to Sea Link.	The Applicant will continue to monitor the progress of new projects, such as the Suffolk Water Recycling Transfer & Storage Project, and will update the cumulative assessment as appropriate during the examination process.	

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	The Applicant has provided a response to the SWRTS project Winter 2025 consultation, and will continue to engage throughout that project and seek to coordinate and engage with Essex & Suffolk Water.	
Design		
Speakers raised the design of the Saxmundham Converter Station. Some considered that initial consultation offered a range of innovative solutions, which have not been progressed in the application. Other Speakers complained that the Applicant has not published the outcome of the Design Review Panel.	The design of the converter station has evolved through consultation and assessment, with the final design reflecting technical, environmental, and stakeholder considerations. The Design Review Panel's input has informed the design process, and the design principles are set out in Application Document 7.12.1 Design Principles – Suffolk [APP-366]. Substantial work has been undertaken and progress made on the development of a site-wide masterplan, which has influenced the development of the Proposed Project and represents a key part of the Applicant's ongoing coordination with National Grid Ventures (NGV). This masterplan has been led by the Applicant, but with the involvement of various other stakeholders including NGV, East Suffolk Council, Suffolk County Council and the Suffolk Design Review Panel (DRP). The Applicant did not publish the DRP feedback because it was not considered appropriate or useful for this to be published in isolation. Although regard was had to it by the Applicant, written feedback following meetings with the DRP was one of many stakeholder inputs that were being considered in the context of the emerging design concepts. This feedback on its own would not have contributed to the host communities' understanding of the emerging proposals and indeed publishing additional documentation may be caused uncertainty at that time over whether further consultation was being undertaken (which it was not). Furthermore, the DRP Terms of Reference confirm the confidentiality of pre-application meetings and their output (stating that where proposals are at a pre-application stage, the report is not made public and is only shared with the planning authority, the applicant and design team, and any other stakeholder bodies that the Council has consulted on the project). Notwithstanding this however, submission documents including Application Document 7.11.1 Design Approach Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] do provide comprehensi	
Emergency Services		
A number of Speakers raised concerns about the Proposed Project's impacts on emergency services, access to medical appointments and services, as a result of congestion, diversions, increased travel times.	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] considers the potential for impacts on emergency services and access to medical facilities. Having factored locations with concentrations of vulnerable users (such as hospitals) into the assessment of traffic effects, the conclusions indicate that no further mitigation measures are considered necessary for traffic and transport receptors in addition to the embedded measures and control and management measures set out within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102].	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102].

Acknowledging the considerable concern about the potential effects of construction traffic on drive times, the outcome of the Applicant's assessment work indicates that the likely impact of the Proposed Project on Driver Delay for all receptors within the study area is considered to be

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	not significant based on the sensitivity levels and small/negligible magnitudes of impact identified for these receptors.	
Environmental policy and legislation		
Concerns were raised around impact on the Suffolk Coast and Heaths AONB/National Landscape, including its special properties and compliance with Section 85 (Oral submission made at OFH2 in Kent after being unable to speak at OFH1. Comments included here to provide a complete record of oral submissions).	The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB are summarised within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and detailed within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The assessment takes into account the Natural Beauty indicators of the Suffolk Coast and Heaths AONB. The Planning Statement (Application Document 7.1 Planning Statement (Clean) [AS-057]) provided an assessment on the Special Qualities Indicators. The effects for all the Natural Beauty indicators and the Special Qualities indicators are considered to be not significant and on that basis the Suffolk Onshore Scheme (alone) is not therefore likely to detract from the Natural Beauty and Special Qualities of the AONB.	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]
	The assessment of the inter-project cumulative effects on the Suffolk and Essex Coast and Heaths AONB is presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. The relevant other developments which were considered in the Inter Project cumulative assessment were: • The Sizewell C main development site;	
	East Anglia ONE & TWO Offshore Windfarms; and	
	LionLink Offshore Interconnector	
	When considering the potential cumulative effects of the Suffolk Onshore Scheme in combination with all the above developments, there is the potential for significant inter-project cumulative effects for a short and temporary period on the AONB due to the potential simultaneous or sequential construction of the projects. The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the AONB has the potential to alter the perception of the AONB with construction of major energy projects becoming a temporary characteristic feature of the landscape. These cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time.	
	Whilst 7.61 ha area of acid grassland would be temporarily affected during construction, this would be temporary and reinstated within a few years. The project is proposing a further 6 ha of acid grassland provided within the Order Limits for delivering enhancement to the AONB located to the south of the A1094. This area would be enhanced and managed as acid grassland prior to the loss of acid grassland east of Leiston Road as per paragraph 5.3.2 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059].	
	Given all of the above, the Applicant considers that the Section 85 duty to seek to further the purposes of the AONB has been complied with.	
	National Grid has submitted Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] at Deadline 1. This technical note provides a single source of reference for material relating to the Section 85 duty within the DCO application documentation.	
Flood risk		
Speakers raised concerns about a potential increase in flood events	The Flood Risk Assessment (Application Document 6.8 [APP-292]) demonstrates that the Proposed Project will not increase flood risk elsewhere. The design incorporates sustainable	Flood Risk Assessment (Application Document 6.8 [APP-292]

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	drainage systems and mitigation measures to manage surface water and maintain existing drainage patterns. Mitigation measures for construction works in areas at higher risk of surface water flooding or where near surface groundwater causes waterlogged conditions is proposed. A range of measures are secured and detailed in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. Measure W06 commits that Sustainable Drainage Systems (SuDS) appropriate to the existing ground conditions would be put in place as early activities in the construction schedule so as to avoid or reduce working on land that is prone to waterlogging and flooding, this measures also prohibits storage of construction materials in areas of high and medium risk of flooding from surface water to prevent blockages of flow paths and to reduce pollution risks. Commitment W10 addresses the potential for severance of existing land drainage routes, including agricultural field drainage systems which are vital for managing localised surface and near surface groundwater conditions and preventing waterlogging. The commitment stipulates that during construction; temporary alternative drainage routes would be provided for and that the existing drainage systems would be	
	permanently reinstated or rerouted ensuring their existing function is maintained. Further, noting that the Proposed Project would be subject to a detailed design stage should the DCO be granted, commitment W14 stipulates that the Contractor shall develop a Drainage Management Plan and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order (DCO) [AS-043]. The plan must demonstrate how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated. Commitment W14 requires that the Contractor shall prepare a construction phase Flood Management Plan that shall consider all construction phase activities and temporary works necessary to deliver the Proposed Project and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of the draft DCO. The Applicant does not consider that the Proposed Project will increase flood risk elsewhere.	
Impact on bird species		
Concerns were raised about the impact on bird species recorded in this area, including Marsh Harrier, Turtle Doves, Hummingbird)	The assessment of ecological impacts (Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 [APP-049]) considers effects on protected sites and species. Mitigation measures are embedded to avoid or minimise impacts, and the assessment concludes that, with these measures, significant adverse effects are unlikely.	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 [APP-049]
Impacts on habitats and Protected Sites		
Concerns were raised about impacts on protected sites, such as SSSI, SAC, SPA, Nature Reserves	The assessment of ecological impacts (Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 [APP-049] and 6.6 (C) Habitats Regulations Assessment Report [REP1-071]) considers effects on protected sites and species. Mitigation measures are embedded to avoid or minimise impacts, and the assessment concludes that, with these measures, significant adverse effects are unlikely.	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 [APP-049] 6.6 (C) Habitats Regulations Assessment Report [REP1-071])
Impact on National Landscape		
Speakers raised concerns about the impact on the Suffolk & Essex Coast & Heaths National Landscape / Area of Outstanding Natural Beauty.	The assessment of landscape and visual effects (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 [APP-048]) considers the statutory duty under section 85 of the Countryside and Rights of Way Act 2000. The project design and mitigation measures seek to conserve and	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 [APP-048]

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
They stated that options must be reassessed in light of section 85(A1) of the Countryside and Rights of Way 2000 (which places an enhanced duty on public bodies to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscapes).	enhance natural beauty, and the assessment concludes that significant effects are limited and temporary. The separate Section 85 note that was submitted at DL1 provides more details on the Applicant's position on this matter (Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]).	Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]
Local Economy		
Concerns were raised about the impact of the Proposed Project on property values and examples were given of people being unable to sell their properties	These concerns are acknowledged by the Applicant. All affected landowners will be compensated on a fair and reasonable basis for any rights acquired, and any impacts on retained property will be considered in line with the Compulsory Purchase Compensation Code. Compensation claims for other disturbance are considered on a case-by-case basis if there is evidence of negative impacts as a result of the Proposed Project	
Mental health and wellbeing		
A significant number of speakers raised concerns about mental health and increased stress and anxiety, as a result of: - Cumulative impacts - Regular / repeated consultation/engagement - Volunteer commitments - Loss of green space	The Applicant acknowledges submissions made at the hearings on these topics, especially around mental health and stress. As with all points raised during the hearings, matters like this are taken very seriously, and the Applicant is committed to continuing to work with all parties in respect of the proposals.	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 [APP-058] Application Document 5.1 Consultation Report
	The assessment of health and wellbeing (Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 [APP-058]) considers mental health and psychosocial impacts, including those arising from cumulative effects and engagement processes. Embedded mitigation and ongoing community engagement are intended to address concerns and minimise adverse effects.	[APP-301]
- Not feeling valued or listened to	Whilst it is acknowledged that the area is subject to several major infrastructure projects, there is no evidence to indicate that the Proposed Project will materially alter the cumulative position for health and wellbeing. The Applicant has also committed to maintaining ongoing dialogue with the Host Authorities in the course of thematic meetings with the aim of ensuring that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management.	
	In addition, as stated in Application Document 5.1 Consultation Report [APP-301] , a community relations team will be appointed by the Applicant to provide dedicated community relations and external communication support during construction.	
	The conclusion, that no significant adverse cumulative effects on health and wellbeing are anticipated, is based on a comprehensive, receptor-focused evaluation across all relevant determinants. The assessment takes into account overlapping construction or operational phases of in-combination effects on single receptors, and in-combination effects with other NSIPs, ensuring that any potential cumulative mental health burden has been robustly considered and the conclusion of 'not significant' remains valid, proportionate, and precautionary.	
Needs Case		
A number of speakers provided comments on the Needs case. Some stated that the Sea Link Project is not solving a problem.	There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in Application Document 7.2 Strategic Options Back Check Report [APP-320] . This sets out the up-to-date and current needs case and reflects the outcome of a backchecking exercise undertaken of the needs case that accompanied the statutory consultation in 2023. The 2023 needs case is set out in Application Document 8.3 Strategic Options Report (October 2023) [App-370] . This back check was undertaken by the Applicant prior to the submission of the DCO application, to confirm that the needs case remains valid and that the strategic options considered continue to meet it	Application Document 7.2 Strategic Options Back Check Report [APP-320] Application Document 8.3 Strategic Options Report (October 2023) [App-370] 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]

valid and that the strategic options considered continue to meet it.

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	National Grid Electricity Transmission plc has a legally mandated role to maintain a secure, efficient, and resilient transmission system. Under the Electricity Act 1989, NGET must ensure the network can handle power flows from existing and contracted generation, interconnectors, and storage, even during fault conditions. Current infrastructure in East Anglia and the South East is already under strain due to rapid growth in renewable generation and interconnection demand. Without reinforcement, these regions face significant risks of congestion and supply interruptions, particularly during low wind periods or network faults.	
	Sea Link directly resolves two distinct and pressing capacity shortfalls. In Kent, it provides an additional route to export power during high interconnector imports and low wind, mitigating vulnerability if the Canterbury-Kemsley line fails. In East Anglia, it enables power evacuation from the Sizewell Generation Group during faults, while bypassing heavily constrained corridors around London and the Thames Estuary. Its HVDC design allows transfer of power in both direction, offering flexibility and relieving pressure across multiple regions. This is not an isolated fix but a coordinated solution aligned with the Holistic Network Design (HND), ensuring the UK can meet carbon reduction commitments and maintain energy security.	
	Sea Link is integral to a strategic, system-wide approach. It complements other reinforcement projects, addresses specific bottlenecks, and supports the connection of low-carbon generation essential for net-zero goals. The Secretary of State's Section 35 Direction explicitly recognized its "important role" in delivering a reliable, affordable, and sustainable energy system. In short, Sea Link is solving real, documented problems—capacity constraints, fault resilience, and system flexibility—while underpinning national energy objectives.	
	A further summary of the needs case is set out in response to Action Point 1 in 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].	
Noise impacts		
Speakers raised comments on noise impacts and disturbance on tranquillity and peace.	An assessment of noise and vibration has been undertaken as reported in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056]). Mitigation measures are embedded, and the assessment concludes that, with these measures, significant adverse noise and vibration effects are unlikely. Consideration of noise and vibration has also informed landscape value judgements relating to tranquillity in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. The effects on landscape character, including tranquillity, are detailed in Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment.	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 [APP-056] Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 [APP-048]
Public Rights of Way		
Concerns were raised about impacts on walking routes (including King Charles III Coastal Path). Effects on mental health and wellbeing from recreation and spending time outside were also mentioned.	The assessment of impacts on Public Rights of Way (Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 [APP-054]) considers effects on access, recreation, and amenity. Mitigation measures, including diversions and management plans, are embedded to maintain connectivity and minimise disruption. The assessment concludes that, with these measures, significant adverse effects on public rights of way are unlikely.	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 [APP-054])
River Fromus Bridge		
Speakers made representations in regards to the proposed Bridge over the River Fromus and Saxmundham Converter Station access road. The concerns raised were in regard to the visual impact of the proposed bridge, including on heritage receptors.	Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209] acknowledges that the operational infrastructure, including a 6 m high River Fromus bridge, would have a significant adverse effect on Landscape Character Area B4 at year 1 operation. Native woodland planting will largely screen and integrate the bridge into the landscape over time. Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] considers that the approach from the south to Saxmundham Conservation Area, Hurts Hall Grade II Listed Building and Associated Parkland would experience Minor Adverse (and	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209] Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	therefore not significant) effects during operation. The residual long-term effects on the landscape and the setting of Hurts Hall are not therefore significant and the extensive native woodland mitigation planting within the Fromus valley cannot be considered as resulting in unmitigable harm.	Assessment and Photomontage Methodology [APP-095]
	The photomontages for Viewpoint 2 and 20 (Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]) reflect the bridge, access road, vegetation removal, and mitigation planting, with plant heights and growth rates agreed with Suffolk County Council and East Suffolk Council.	
Sea Link Project		
Some Speakers questioned the motivation of National Grid. Queries around the funding of the project were raised with some speakers alleging that the Project was being promoted only for the profit of shareholders and private investors. Requests were made for the detail of cost analysis	The Proposed Project is promoted to meet statutory duties and national policy objectives for electricity transmission. As outlined in the Applicant's response to comments about the need case, there is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in Application Document 7.2 Strategic Options Back Check Report [APP-320] and a further summary of the needs case is set out in response to Action Point 1 in 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].	Application Document 7.2 Strategic Options Back Check Report [APP-320] 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124] Application Document 4.1 Funding Statement [APP-011]
	Funding and cost assessments are set out in Application Document 4.1 Funding Statement [APP-011] and Application Document 7.2 Strategic Options Back Check Report [APP-320]. The Proposed Project is subject to regulatory oversight and funding is secured via Ofgem's framework.	Application Document 7.2 Strategic Options Back Check Report [APP-320] Application document 7.3 Design Development Report [App-321].
	The process of selecting sites to accommodate new infrastructure was undertaken in accordance with the National Grid's approach to project development, as set out in Application document 7.3 Design Development Report [App-321] . This involves a balanced consideration of various environmental, socio-economic, engineering, and cost factors, which (alongside consultation, ongoing survey work, and back checking) inform reasoned judgements as to what the most appropriate project design to take forward.	
Some speakers stated that the Sea Link application is not ready for submission. They considered that it has not been submitted at the right time, and there needs to be a pause for a more appropriate time	The timing of the submission of the DCO Application has been actioned in accordance with the national need for network reinforcement and the requirements of the Planning Act 2008. The Proposed Project has been developed in coordination with other infrastructure proposals and is subject to a robust examination process.	
(indicated as after completion of Sizewell C, and following holistic consideration of options for energy projects)	The DCO application has been deemed acceptable by the Planning Inspectorate in accordance with the requirements of Section 55 of the Planning Act 2008. These requirements include a provision that the Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory' standard to the Secretary of State. The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the Notification of Decision to Accept Application [PD-001] issued on behalf of the Secretary of State on 23 April 2025.	
Security		
Some speakers raised concerns about safety risks and security from so much critical infrastructure within a small area.	The Applicant is required to comply with all relevant safety and security regulations for critical infrastructure. The design and operation of the Proposed Project incorporate measures to ensure the safety and security of assets, in line with national standards and regulatory requirements.	
	As an operator of national infrastructure, the Applicant commits significant resources and investment into maintaining the security of its sites and assets.	
	The Applicant liaises with the Department for Energy Security and Net Zero, other government departments and agencies, and law enforcement on security matters including the threat from	

Topic/Theme raised by Speakers	Applicant's Response	Relevant DCO Application documents
	hostile nation states, terrorism, and other security threats. Through these partnerships, appropriate protective security controls are identified and put in place to mitigate threats across their network.	
	The Applicant follows government advice, industry standards and best practice, and the network is designed to allow for potential equipment failure or disruption and be able to continue to deliver safe, secure and reliable electricity.	
	As new assets are built, significant changes are made to any site, or the threat landscape changes, security is considered/reviewed.	
Strategic planning for energy infrastructure		
Speakers raised the need for strategic planning for energy infrastructure, including an offshore strategy.	While an overarching strategy for energy infrastructure may primarily be regarded as being a matter for government policy, a strategic approach to energy infrastructure delivery is reflected in the Clean Power 2030 'Advice on achieving clean power for Great Britain by 2030' Report (November 2024) is the National Energy System Operator (NESO) analysis of what it considers to be the pathway to a clean power system by 2030.	Application Document 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]
	This report states that a major network expansion is needed to achieve this, and specifically that Sea Link is critical for the achievement of the Clean Power 2030 target. It also states that the delivery date for Sea Link required acceleration (from its licenced connection date in 2031 to its earliest in-service date of 2030). The report states that without Sea Link, consumers could face an extra £1.4b in constraints costs in 2030.	
	The Clean Power 2030 has not changed the plans for Sea Link, it only highlights the importance of its delivery.	
	The process for making connection offers is overseen by the NESO. Generators apply to the NESO for connections to the transmission system, and the NESO makes a connection offer to the generator. The NESO has its own processes for assessing connection applications and the location and timing of connection offers, but this includes consideration of the location of generation, capacity of the existing transmission network, and the costs of investing in reinforcement projects considered against the costs of constraining generation using constraints payments. Similarly, an offshore strategy would be a matter for government policy and informed by what is technically feasible, based on available technology. Regardless of the technical constraints, there are also significant environmental, shipping, and other constraints in the offshore environment which need to be considered when considering whether additional offshore infrastructure may be beneficial.	
	In the context of the Proposed Project, the Applicant provided detail on this matter in response to AP1 from Issue Specific Hearing 1 (Application Document 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]).	
Tourism impacts		
Speakers raised the potential for impacts on the tourism economy, including: - Shops - Accommodation - Restaurants, cafes	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, such that any likely significant effects of the Scheme have been identified and mitigated.	• •
 Recreation facilities and visitor attractions Employment 	The socio-economic assessment (Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 [APP-057]) concludes that, with embedded mitigation, there will be no significant adverse effects on tourism, local businesses, or visitor attractions. The assessment considers both direct and indirect impacts, including perception and amenity.	

This issue also included impacts on the perception of the area (linking to traffic and construction impacts).

Impacts on nature tourism were also raised.

Traffic surveys and assessment

Speakers raised that insufficient traffic surveys had been completed and that they had been undertaken in January/February, with no consideration of seasonal peaks in July/August from tourists.

Although the traffic surveys within Suffolk were carried out in January and February, the baseline Application Document 6.2.2.7 Part 2 Suffolk traffic flows which have informed **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7** Traffic and Transport [APP-054] are based on an agreed survey methodology with Suffolk County Council Highways and are considered appropriate and robust. Had higher baseline traffic flows been adopted to account for seasonal fluctuations during the Summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported for the majority of the assessment criteria in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This would have resulted in lower levels of impact being identified and reported (except for the assessment of driver delay). Therefore, no seasonal adjustments were made, as higher baseline traffic numbers would have generally been a less robust assessment scenario than lower baseline traffic numbers.

Chapter 7 Traffic and Transport [APP-054]

Other

Consideration of spiritual / cultural aspects important to the area

Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation [APP-047] defined the scope of what the Proposed Project should consider in its assessment of cultural heritage. Accordingly, Application Documents 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] and Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] have informed the Proposed Project's understanding of the cultural context of the area in which it is to be located. This includes assessment of features of religious or spiritual significance within the landscape and the built environment—defining both the significance of receptors and the magnitude of impacts associated with the Proposed Project in both construction and operational phases. Where specific impacts are identified, mitigation measures are set out in **Application Document** 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation [APP-343] and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan -Suffolk [AS-059].

Following the implementation of mitigation measures the assessment considers that the effects of the Proposed Project are not significant.

Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and **EIA Consultation [APP-047]**

6.3.2.3.A ES Appendix 2.3.A Cultural Heritage **Baseline Report [APP-109]**

Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]

Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation [APP-343]

Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059].

2.2 Applicant's Responses to Oral and Written Submissions – Factual Errors

Table 2.2 Applicant's response to what are considered to be factual errors that it is necessary to rebut.

Themes	Applicant's Response	Relevant DCO Application documents
Speakers raised concerns about the destruction of the beach at the landfall and the impacts of this on the enjoyment for local residents and visitors.	A trenchless construction method would be used to install cables beneath the surface of the landfall point at Leiston, therefore minimising disturbance to the natural environment at this and reducing effects upon resident and visitor enjoyment of the beach and the surrounding area. This is secured by Commitment W12 within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].	Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]

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