

Submitted by the Sea Link Project 'Have Your Say' portal

The Sea Link Examining Authority
The Planning Inspectorate
Temple Quay House, Temple Quay
Bristol, BS1 6PN

9 January 2026

Dear Sarah Holmes and Inspectorate Team,

RE: SEAS Comments on ExQ1 Issued on 17 December 2025 - [REDACTED]

SEAS thank you for the extensive list of questions to the Applicant in the hope of clarifying the many outstanding issues regarding the SEA LINK DCO Application.

While many of the ExA's ExQ1 questions are addressed to the Applicant or other bodies, SEAS has chosen to provide brief comments on a limited number of questions where it has previously submitted relevant evidence and where the issues raised are material to SEAS representations.

1. General – AI
2. Landscape and Visual
4. Cultural Heritage
8. Traffic
11. Socio-Economics, Recreation and Tourism
- 13/14. Cumulative Effect Intra & Inter

The following comments are intended to assist the ExA and are not intended to duplicate the questions asked or to respond on behalf of other parties.

Thank you for your consideration.

Yours sincerely

The SEAS Team
Info@SuffolkEnergyActionSolutions.co.uk

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

ExQ1 to:	Question	SEAS Comments
1. General and Cross-topic Questions (GEN)		
General		
1GEN1. All Parties	<p>Artificial Intelligence</p> <p>The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information or data? This does not include basic spell-check or grammar tools.</p> <p>If yes;</p> <ul style="list-style-type: none"> • detail what material you have submitted which has been created using AI; • what systems or tools you used; • what the source of the information the AI based its content on was; and • what information or material the AI has been used to create or alter. <p>In addition, if you have used AI, you should do the following:</p> <ul style="list-style-type: none"> • clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation • tell us whether any images or video of people, property, objects or places have been created or altered using AI • tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image) • tell us the date that you used the AI • declare your responsibility for the factual accuracy of the content • declare your use of AI is responsible and lawful • declare that you have appropriate permissions to disclose and share any personal information and that its use complies with data protection and copyright legislation <p>If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.</p>	<p>Consolidated AI Disclosure and Declaration of Responsibility:</p> <p>In response to ExQ1 1GEN1, SEAS has in some instances used AI (ChatGPT, Google Gemini, Microsoft CoPilot) as secondary supporting tools to assist in the summarisation of the extensive Examination Library documents and the structural organisation of our submissions. This applies to a varying extent to all SEAS submissions provided to date, including RRs (RR-5210 and AS-038), WRs (REP1-271 to 282), and Rebuttals (REP2-111 to 125).</p> <p>All submissions have been authored, reviewed, and fact-checked by human members of the SEAS team, and should therefore be viewed as expert/informed representations and judged on their substantive merits. In accordance with the 6 September 2024 PINS guidance, SEAS takes full responsibility for the factual accuracy of these submissions.</p> <p>In the interest of procedural fairness and ensuring the fair and impartial decision-making mentioned in the September 2024 PINS Guidance, SEAS respectfully requests that the ExA requires the Applicant to provide an equivalent Rule 1GEN1 disclosure for all technical and environmental submissions to date.</p>

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

<p>1GEN5 Applicant</p>	<p>Need</p> <p>The ExA acknowledges that there would be no requirement to apply the National Energy System Operator (NESO) energy transmission design principles to this scheme. However, if they did apply, would the proposed scheme be in accordance with them? If yes, explain how. If the proposed development is not in accordance with the NESO energy transmission design principles explain why this is considered acceptable.</p>	<p>In Question 1GEN5 the Examining Authority asks the Applicant whether or not the Proposed Project would comply with NESO’s forthcoming Energy Transmission Design Principles, and if not, how it would be acceptable <i>not</i> to comply.</p> <p>1.1 SEAS considers that the Sea Link project has ignored strategic principles in the development of this unnecessary infrastructure, and we welcome the opportunity to revisit this fundamental element of the DCO Application given by this question – in the hope that it will be helpful to the ExA. We set out briefly below a range of issues at all three levels of the ETDP where Sea Link would fail to meet the criteria.¹</p> <p>2 ETDP Strategic Principles</p> <p>2.1 Tables SP3 and SP2 include the following overarching strategic requirements:</p> <p>2.1.1 (SP3) <i>Promote economic, efficient and co-ordinated infrastructure designs and technologies, and support effective project delivery, improving lifetime efficiencies wherever feasible.</i></p> <p>2.1.2 (SP3) <i>Use innovative technology and approaches, where appropriate, to further efficiency and co-ordination, and to hasten the achievement of the Government’s decarbonisation targets.</i></p> <p>2.1.3 (SP2) <i>Protect or seek to avoid landscapes, environments and amenities of cultural and community importance, and actively reflect the views of communities and stakeholders wherever practicable</i></p> <p>2.2 SEAS have shown throughout the examination and in consultation that on the one hand, the current reinforcement proposal is not needed on the evidence provided for it, and on the other, that if there were such a need there are more innovative and economic means to achieve it. The current proposal fails to show any evidence of real innovation, such as a more radical, offshore, <i>co-ordinated</i> solution; and the actual need that exists at present and for the next five years at least can be more simply met by upgrading existing lines to more modern, innovative and <i>cheaper</i> technology - see section 3 below.</p> <p>3 ETDP Network Design Principles</p>
------------------------	--	---

¹ All references to the ETDP are to *ETDP Consultation Document NESO template 10 sept.pdf*, available at: <https://www.neso.energy/document/368061/download>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

		<p>3.1 The overarching principle S1 of Network Development is: <i>'Proposals for new substations, substations extensions and converter stations should meet the technical needs in a cost-effective way whilst considering environmental and community effects,'</i> in line with s9.1 of the Electricity Act 1989's duty to <i>'...develop and maintain an efficient, co-ordinated and economical system of electricity distribution...'</i> SEAS has shown in earlier Representations (for example REP1-281, paras 46-51) that there is no needs case for the Proposed Project that would not be met more efficiently and economically by a reconductoring & upgrade of the Sizewell to Bramford Double Circuit OHL - at a vastly lower cost. The present cost estimate for Sealink is £1.18bn², which would likely rise to around £2bn by completion; and the cost of the OHL upgrade being a maximum of £100m, there can be no doubt that the proposed project would fail this criterion. The vastly greater environmental and community impacts compared to those of the line upgrade would add to the failure to comply.</p> <p>3.2 Table O1 of the ETDP (offshore design) suggests that design should include consideration of <i>'..shared primary and auxiliary infrastructure onshore and offshore..'</i>, and has a number of 'Landfall considerations' that would not be met by the proposed project. We consider three of them that Sea Link's submission fails to meet.</p> <p>3.2.1 <i>Environmentally sensitive or protected areas, both on- and off-shore:</i> the physical characteristics of the coastline and area in the direct vicinity of the proposed landfall include for example an SSSI, an RSPB Reserve, and current evidence of coastline receding several metres each year due to climate change and tidal impacts;</p> <p>3.2.2 <i>The design process must also account for potential impacts on communities, environment and economic efficiency:</i> In this case the proposed landfall site ignores or trivialises the presence of communities and/or sensitive environment in the vicinity which will undoubtedly be badly affected during construction and maintenance. The settlements of Saxmundham, Benhall, Sternfield and Aldeburgh will all face impacts that have not been properly accounted for.</p> <p>3.2.3 <i>Offshore coordination (both spatial and electrical) should be considered as a potential way of achieving further efficiencies..[...].and where no risks arise..[...].it should be taken forward:</i> the cumulative impacts foisted onto the communities and environment of East Suffolk by the proposed project, and the overwhelming presence</p>
--	--	---

² At 2018 prices

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

		<p>of other infrastructure (eg Sizewell C, SPR's East Anglia 1N and East Anglia 2) are a clear demonstration that the economic and environmental efficiencies of offshore coordination have not been properly considered.</p> <p>4 ETDP Project Development Principles</p> <p>4.1 These detailed principles give clear examples that the ETDP criteria would not be met, and it can be shown that other sites potentially available to developers would have been closer to compliance. Our principal areas for criticism are within the issues of <i>landfall impact</i>, <i>access</i>, and <i>landscape</i>, all sensitive to the choice of site. We make only brief reference to each issue, but would expand on these points in an ISH.</p> <p>4.2 Table U1 of the project development principles raises significant considerations that have been ignored in the landfall selection of the proposed project, for example:</p> <p>4.2.1 '<i>Disturbances during construction and repair (noise, visual, air quality, environmental, soil, drainage, archaeology); Opportunities to route along existing disturbed corridors such as roads or existing infrastructure to reduce new impacts, being mindful of physical resilience implications and access requirements during construction and operation</i>'; The selection of landfall actually <i>underneath</i> North Warren RSPB Reserve, with all the potential impact on migratory birdlife, is clear evidence that the proposed project would not meet the balance required in the design parameters.</p> <p>4.2.2 '<i>Ground conditions including risk of contamination and ground stability.</i>' RSPB North Warren is relatively recently silted marshland with uncertain geological stability, and quite unsuitable.</p> <p>4.3 Table S4 of the project development principles sets out a number of criteria which the proposed project would not meet, and for simplicity we set these out in tabular form, showing the reference, the design consideration, the failed areas, and a potential alternative site at the former RAF Leiston that would be more likely to pass the ETDP tests. The table is set out below.</p> <p>5 Conclusion</p> <p>The ExA's question 1GEN5 is purely hypothetical, but we hope that our comments on the potential failure of the NGET submission to meet the criteria that will soon govern future NSIP developments will assist the ExA to review actual flaws in the Applicant's submission. Our case remains that:</p>
--	--	--

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

		<ul style="list-style-type: none"> - There is no current needs case to support a development at this scale or at this time, since the required reinforcement in Suffolk can be more simply and economically achieved with an OHL upgrade; - If there were a need, the case for the proposed site is flawed and incomplete, as the current Change Request for works to Benhall Bridge amply demonstrates; - If there were a need, it could be met with less environmental, ecological, socioeconomic and community damage on a different site and with greater co-ordination with other active or proposed NSIPs.
--	--	--

ETDP Project development tables S4, S5, S7, S9, – comments and alternatives

Table:	Design Consideration	Criteria unlikely to be met	Alternative possibility/ies
S4, BP 3	Land Availability and ground Conditions	Flood risk; good agricultural land rather than brownfield or previously developed land; significant environmental/heritage impacts	Alternative and adequate site at former RAF Leiston site, previously developed land
S4, BP 4	Access requirements for construction and maintenance	No full traffic assessment or junction modelling carried out; poor access from B1121 (Benhall Bridge) for construction <i>and</i> maintenance; interaction with SZC construction traffic and A12 improvement works.	Better access via B1122/SZC Link road for site at former RAF Leiston, fewer community/socioeconomic/environmental issues in construction haul roads.
S5 BP 5	Flood Prevention	Flood risks identified at Saxmundham site	Insignificant at former RAF Leiston Site
S5 BP 6	Ease of operational and maintenance access	As above for S4 BP4 Access requirements	Better access via B1122/SZC Link road for site at former RAF Leiston
S7 ALL	Optimisation of space utilised	Access issues across the board, all of which NGET have underestimated, especially access and egress for abnormal indivisible loads	Better separation from cumulative issues at former RAF Leiston site, adequate land available for optimisation of future development/access
S9 BP ALL	Local Environment – impact issues	All of the areas noted (ecology, hydrology/flood risk, LVIA) are exacerbated by proximity of proposed converter station site to Saxmundham settlement and proposed new housing.	

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

2. Landscape and Visual (LVIA)		
ExQ1 to:	Question	SEAS Comments:
1LVIA2. Applicant	<p>Good design</p> <p>In terms of good design, NPS EN-1, for example paragraphs 4.7.11 and 4.7.12, identifies that the wider impacts of a development, including landscape impacts, are important factors in the design process. In terms of landscape and visual effects, paragraph 5.10.28 identifies that it may be appropriate to undertake landscaping off site, for example filling in gaps in existing tree and hedge lines. Paragraph 5.10.37 states that the Secretary of State should consider whether the development has been designed carefully, to minimise harm to the landscape, including by appropriate mitigation.</p> <p>Provide an explanation as to whether additional landscape planting could result in the mitigation of likely significant landscape and visual effects as identified in table 1.12 of [APP-048] and table 1.13 of [APP-061]. Provide an explanation as to why opportunities for mitigation of residual effects have not been pursued.</p> <p>Although significant adverse cumulative effects are identified in [APP-073] and [APP-060] for landscape and visual, no additional</p>	<p><i>The Question is not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.</i></p> <p>SEAS would like to note the Applicant's own cumulative assessment in APP-060 (Chapter 13) identifies Moderate Adverse (Significant) cumulative landscape and visual effects, and records that total cumulative effects on certain landscapes and viewpoints have the potential to be significant (APP-060, section 13.4) during construction and decommissioning, particularly when Sea Link is considered in combination with Sizewell C, EA1N/EA2, LionLink and other major projects in East Suffolk. In several cases the Applicant concludes that no further cumulative mitigation is available, and that significant cumulative effects therefore remain.</p> <p>SEAS submits that this is not consistent with EN-1 policy on good design or with the mitigation hierarchy. EN-1 requires the Applicant to:</p> <ul style="list-style-type: none"> • take opportunities to mitigate cumulative effects, not just project-only effects • apply the full mitigation hierarchy, including compensatory measures where residual significant impacts remain • give particular weight to nationally important landscapes, such as the Suffolk Coast & Heaths National Landscape (AONB) <p>However, the Applicant:</p> <ul style="list-style-type: none"> • proposes no additional landscape mitigation or compensation specifically addressing cumulative harm

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	<p>mitigation is identified. Provide an explanation of whether additional landscape planting could result in the mitigation of significant adverse landscape and visual effects. Provide an explanation as to why opportunities for mitigation of cumulative residual effects have not been pursued.</p>	<ul style="list-style-type: none"> • provides no cumulative landscape master planning at Saxmundham/Friston despite multiple strategic energy projects being focussed there • relies almost entirely on project-specific planting, which does not address the combined footprint of multiple energy schemes <p>SEAS also notes Natural England's concern that the cumulative conclusions in the ES indicate potentially significant harm to the National Landscape, and that compensation should be explored if such harm cannot be mitigated. In our submission, the Applicant's statement that no additional mitigation is available is not an acceptable endpoint under EN-1 and should not be accepted unless the Applicant has first demonstrated:</p> <ul style="list-style-type: none"> • why coordinated mitigation with other NSIPs has not been pursued • why off-site compensatory measures have not been considered • why a strategic landscape/visual mitigation plan for Saxmundham/Friston has not been produced
1LVIA12. Applicant	<p>Visualisations</p> <p>The ExA notes that type 1 and type 3 visualisations have been provided in the application documents. In view of the nature and scale of the proposed development, the sensitivity of the context and the magnitude of the effects that have been identified, provide an explanation as to why type 4 visualisations have not been provided, with reference to the guidance in the Landscape Institute Technical Guidance Note 06/19.</p>	<p><i>The Question is not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.</i></p> <p>SEAS would like to highlight the proposed development includes very large-scale infrastructure within a sensitive rural landscape, in close proximity to residential receptors and valued countryside. The Environmental Statement itself identifies significant and adverse visual effects, particularly at closer viewpoints and settlement edges. In these circumstances, the Landscape Institute Technical Guidance Note 06/19 anticipates that Type 4 visualisations would normally be required to enable decision-makers to properly understand likely effects.</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	<p>Provide an explanation of how type 4 visualisations would differ from the type 3 visualisations that have been provided, in terms of the photographic equipment, presentation of the information, locational accuracy and whether the data used is verifiable.</p> <p>Summarise the purpose and use of the type 3 visualisations and the extent to which they have been supplemented by other evidence such as site visits, professional judgement in undertaking the overall assessment?</p> <p>Furthermore, the ExA notes that the winter year 15 visualisations at the following viewpoints do not allow a proper assessment as there are significant obstructions in the foreground due to crops. Therefore, for Suffolk viewpoint 8a provide a year 15 winter visualisation.</p>	<p>SEAS supports that no clear or robust justification has been provided by the Applicant as to why Type 4 visualisations were not prepared. The absence therefore represents a methodological shortfall, rather than a reasoned professional choice, and materially limits the ExA's ability to independently verify the conclusions drawn in the LVIA.</p> <p>The ExA is correct to note that the submitted winter year 15 visualisations at several viewpoints are compromised by foreground obstructions, including standing crops. This is inconsistent with the purpose of winter visualisations, which are intended to represent minimum screening conditions.</p> <p>For Suffolk Viewpoint 8a, the existing material does not allow a proper assessment of the development's long-term visual presence. A replacement year 15 winter visualisation should therefore be provided, prepared in accordance with LI TGN 06/19, and free from avoidable foreground obstruction.</p> <p>Without this, the assessment understates the likely visibility of the development in winter conditions and further weakens the robustness of the LVIA conclusions.</p>
1LVIA13. Applicant	<p>Coordination</p> <p>Applicant - The ExA notes that the Coordination Document [APP-363] sets out opportunities for coordination in terms of project development and project delivery. Several opportunities for coordination in terms of landscape planting and mitigation are identified, particularly in relation to Friston substation and Saxmundham</p>	<p><i>The Question is not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.</i></p> <p>The Examining Authority's request for an updated Coordination Document is necessary and justified.</p> <p>While APP-363 identifies a number of potential opportunities for coordination, particularly in relation to landscape planting, mitigation and phasing at Friston substation, Saxmundham converter station and the Suffolk landfall, it does not</p>

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	<p>converter station and the phasing of development. The ExA notes that there are also opportunities for coordination in relation to the landfall in Suffolk, that could help to mitigate effects on the NL.</p> <p>Provide an updated version of [APP-363] which explains how coordination would be secured.</p>	<p>explain how such coordination would be secured in practice. As drafted, the document is aspirational rather than operational.</p> <p>APP-363 does not identify:</p> <ul style="list-style-type: none"> • Any binding governance or delivery framework, • Any legal or procedural mechanism to require coordinated outcomes, • Any DCO Requirements or obligations to secure aligned phasing or mitigation, • Any clear responsibility for decision-making or conflict resolution. <p>In the absence of secured coordination, there is no certainty that the landscape mitigation relied upon in the assessment would be delivered in a timely, consistent or effective manner. This is particularly critical in sensitive locations, including the National Landscape at the Suffolk landfall, where uncoordinated or sequential construction risks prolonged and compounded harm.</p> <p>Where mitigation depends on coordination between projects, that coordination must be clearly defined, enforceable and transparent. An updated version of APP-363 is therefore essential to demonstrate that the mitigation proposed is deliverable and can properly be relied upon in the assessment of effects.</p>
--	---	---

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

4. Cultural Heritage		
ExQ1 to:	Question	SEAS Comments:
CH2. Applicant	<p>Heritage asset assessment</p> <p>A number of heritage assets, such as listed buildings, have been scoped out of the ES for further assessment. Provide a list of all heritage assets (designated and non-designated) that are within the study areas, with an explanation as to why they were individually scoped out for further assessment and what level of impacts the proposed development would have on them, if any.</p>	<p><i>The Question is not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.</i></p> <p>The Examining Authority's request for a comprehensive list of heritage assets scoped out of further assessment is strongly supported by the matters set out in the SEAS Rebuttal of NGET's Cultural Heritage Responses (REP2-116)</p> <p>As demonstrated in that rebuttal, the Applicant has repeatedly relied on distance, assumed screening, selective viewpoints and speculative future planting to justify scoping out both designated and non-designated heritage assets, without providing a transparent, asset-by-asset explanation of how those conclusions were reached.</p> <p>The SEAS Rebuttal identifies a consistent pattern of methodological failure, including:</p> <ul style="list-style-type: none"> • The reduction of "setting" to narrow questions of visibility, contrary to national policy and Historic England guidance; • Reliance on summer-only photography that misrepresents year-round and winter conditions; • Failure to assess experiential, sequential and gateway views where multiple assets are perceived together; • Scoping out of assets that are demonstrably experienced in conjunction with the proposed converter station, access road and River Fromus bridge;

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

- Failure to consider foreseeable cumulative impacts, including the acknowledged intention to co-locate Sea Link and LionLink at Saxmundham.

In several cases highlighted in the SEAS Rebuttal, assets scoped out of full assessment are subsequently shown through site evidence and expert analysis to experience **low to moderate adverse effects** on their settings. This calls into question the robustness and consistency of the Applicant's scoping decisions.

Without a clear schedule identifying:

- all heritage assets within the study areas,
- the specific justification for scoping out each asset, and
- the level of impact that would nevertheless arise (including changes to setting).

The ExA cannot independently verify that scoping decisions were lawful, proportionate, or policy-compliant.

In this context, the Examiner's question is necessary to address deficiencies already evidenced in the Applicant's submissions. It seeks essential clarification, not new assessment, and is required to ensure that heritage impacts, particularly those arising from cumulative change and setting, have not been understated or omitted.

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

8. Transport and Traffic		
ExQ1 to:	Question	SEAS Comments:
1TT1. Applicant	<p>Peak construction times</p> <p>Within the Suffolk Onshore Scheme Inter-Project Cumulative Effects documents [APP-060] it states that no significant cumulative effects are expected when considering construction/operational traffic associated with all committed developments combined, given that the peak construction phases for each scheme are unlikely to fully overlap. What certainty does the applicant have that the peak construction times are unlikely to overlap, given the number of variables typical in large scale construction programmes? Having identified that a full overlap is unlikely, is it therefore likely that there would be a partial overlap of peak construction times. If so, what would be the implication of this?</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS does not consider that the Applicant has demonstrated that peak construction activity for Sea Link will not coincide with peak activity from other NSIPs. No combined, evidence-based construction programme has been provided to substantiate this assumption.</p> <p>Baseline traffic flows are derived from unadjusted winter surveys and therefore do not represent peak summer conditions, when background and tourism-related traffic on the A12, A1094 and B1119/B1121 corridors is materially higher.</p> <p>Given the scale and duration of Sea Link alongside Sizewell C, EA1N/EA2, LionLink and associated highway works, there is a realistic prospect of overlapping construction peaks affecting the same highway links and communities.</p> <p>The assessment does not test a realistic worst-credible cumulative scenario in which construction peaks coincide with summer traffic; reliance on non-overlap assumptions does not provide a robust basis for assessing cumulative traffic effects.</p>
1TT5. Applicant	<p>Inter-project traffic cumulative methodology</p> <p>In both counties inter-project cumulative effect assessments [APP-060] [APP-073], the applicant states that "Specifically, in relation to traffic and transport in the Stage 4 assessment, where a scheme is expected to be approximately 50% built out, 50% operational trip generation has been adopted, and where the development is expected to be 75% built out, 75% operational trip generation has been</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>The Applicant's cumulative traffic assessment varies traffic from other schemes according to assumed percentages of construction completion. In SEAS's view, this approach does not reflect how construction traffic is typically generated in practice.</p> <p>Construction traffic commonly exhibits distinct peaks and troughs, with disproportionately high HGV movements during specific phases such as site establishment, earthworks,</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	<p>assumed, and so on.” Explain the basis for this assumption given that the proposed development and other development programmes appear to show peaks and troughs in construction traffic over their respective construction periods rather than a progressive decrease in traffic over time? Would it depend on the type of development?</p>	<p>concrete pours and delivery of abnormal indivisible loads, and can remain high during later commissioning stages.</p> <p>By assuming a smooth pro-rata relationship between construction progress and traffic volumes, the assessment risks underestimating coincident peak flows, masking short but severe impacts, and failing to identify critical periods of high HGV intensity on constrained rural roads.</p> <p>As a result, the cumulative traffic assessment does not provide a robust basis for evaluating worst-credible cumulative effects, and the extent of cumulative impacts may be materially understated.</p>
<p>1TT8. Applicant</p>	<p>Safety of cyclists</p> <p>The proposed traffic routes would use some more minor rural roads with narrow carriageways. What can be done to ensure the safety of cyclists on these routes, as they could be considered vulnerable in such circumstances where there is a notable increase in HGV traffic?</p>	<p><i>The question is not addressed to SEAS, but given SEAS’s previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS remains concerned that the transport assessment does not adequately reflect the safety risks to cyclists and pedestrians arising from increased HGV movements on narrow rural roads such as the A1094 and B1121/B1119.</p> <p>These routes are heavily used by cyclists, including recreational and tourism users, particularly during the summer months, yet traffic modelling is based on winter baseline data and does not assess peak seasonal conditions.</p> <p>The interaction between large construction vehicles and vulnerable road users on constrained road geometry has not been robustly evaluated, and mitigation measures appear largely generic rather than tailored to specific high-risk locations.</p> <p>SEAS considers that without a more realistic assessment of seasonal usage and conflict risk, the conclusions on cyclist and pedestrian safety are not sufficiently robust.</p>

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

<p>1TT11. Applicant</p>	<p>Junction modelling</p> <p>The applicant states that it has assessed driver delay at junctions as a result of the proposed development in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement (IEMA, 2023). However, to supplement this assessment the ExA requires detailed junction modelling of all critical junctions, which should be identified and agreed in advance by the Local Highway Authorities (KCC and SCC), that are to be used by construction phase traffic.</p> <p>This junction modelling should provide key junction performance indicators (including ratio of flow to capacity (RFC)/degree of saturation and corresponding average delay per vehicle durations). This should be produced for appropriate scenarios (also agreed in advance with the Local Highway Authorities) to enable identification of specific proposed development impacts compared to a base scenario, which includes all appropriate cumulative traffic associated with approved developments.</p> <p>This is considered to be necessary so that proposed development traffic impacts can be clearly understood, particularly in junctions/locations which are already predicted to be operating at or above capacity, possibly due to the construction activity of Sizewell C for example, and as indicated in the transport</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS remains concerned that the transport assessment relies on very limited junction capacity modelling, with detailed analysis confined to a small number of locations, while many affected junctions on the A12, A1094 and B1119/B1121 corridors are not modelled at all.</p> <p>Where modelling has been undertaken, it is generally based on winter baseline traffic data and does not test peak seasonal conditions or realistic construction traffic scenarios.</p> <p>In the absence of comprehensive and transparent junction modelling, particularly at known constraints and community access points, the assessment does not provide a robust basis for concluding that construction traffic impacts would be acceptable in terms of congestion, delay or safety.</p> <p>SEAS considers that these limitations materially weaken the reliability of the Applicant's conclusions on traffic impacts.</p>
-----------------------------	--	--

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	model output tables included in the SCC LIR [REP1-130] starting at paragraph 11.106.	
1TT12. Applicant Suffolk County Council Kent County Council	<p>Overlapping construction programmes</p> <p>Applicant - In the applicant's response to RR [REP2-014] (specifically responding to SCC comments) it is stated that there could be a minor/moderate cumulative effect which could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the proposed development and other projects (such as Sizewell C and LionLink) overlapped precisely. A possible moderate cumulative impact would potentially be disruptive for people who live in the area, especially if it lasts for nine months. What more can the applicant provide and secure to ensure that this level of cumulative effect is avoided or further mitigated?</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS remains concerned that the transport assessment does not robustly evaluate the traffic implications of programme overlap between Sea Link and other major projects, including LionLink, Scottish Power EA1N & EA2, Sizewell C and the extensive Suffolk Water Recycling Project.</p> <p>While the Applicant acknowledges the potential for overlapping construction activity, the assessment relies on assumptions about sequencing and non-coincidence rather than evidence-based combined programme analysis.</p> <p>The absence of a realistic assessment of overlapping construction traffic undermines confidence that cumulative HGV flows, congestion and safety impacts on shared routes have been fully identified.</p> <p>SEAS considers that without explicit testing of overlapping construction scenarios, the cumulative traffic effects on local communities and constrained rural roads may be materially understated.</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

11. Socio-Economic, Recreation & Tourism

ExQ1 to:	Question	SEAS Comments:
1SERT1. Applicant	<p>Long term impacts to the tourism brand</p> <p>The rural landscape and tranquility are noted as attractive aspects for tourism, particularly for rural areas like East Suffolk. The change to the landscape from the proposed buildings and pylons would be long-term. What impact would this have on the long-term tourism attraction for these areas of Kent and Suffolk, especially when considered cumulatively with other planned developments?</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS remains concerned that the assessment does not adequately evaluate the cumulative effects on tourism and recreation arising from prolonged and overlapping construction activity in East Suffolk.</p> <p>A succession of major energy projects has the potential to generate long-term negative effects on visitor perception, including re-branding of the Suffolk Coast as an “energy coast”, loss of tranquillity due to sustained construction activity, erosion of landscape character and visual amenity, PRow closures affecting walking and nature-based tourism, and cumulative traffic congestion on local roads.</p> <p>These impacts are experienced by visitors as a combined effect, yet the assessment considers tourism, landscape, access and traffic largely in isolation rather than as part of an integrated visitor experience.</p> <p>The assessment does not sufficiently consider the duration and seasonality of impacts, particularly the effect of repeated construction activity, traffic disruption and access constraints during peak visitor periods over multiple years.</p> <p>SEAS notes that the Applicant has provided no meaningful cumulative tourism or brand assessment, with no visitor perception research, no quantitative assessment of visitor spend or business impacts, and no evaluation of how prolonged cumulative disturbance may affect the Suffolk Coast's attractiveness as a destination.</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

		As a result, SEAS considers that the cumulative implications for tourism, recreation and the visitor economy are likely to be significantly understated where impacts are assessed project-by-project rather than in combination.
--	--	---

13/14. Cumulative Effect inter and intra

ExQ1 to:	Question	SEAS Comments:
1CEIntra1. Applicant	<p>Significant cumulative intra-project impacts to public rights of way and transport</p> <p>The submitted Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] states that there is potential for a significant intra-project cumulative effect to occur on PRow users (in the construction and decommissioning phase). Similarly, there is stated to be a significant cumulative effect for some transport routes for all phases of the proposed development, such as to the B1119 and the Suffolk Coastal Cycle Way. However, it is also stated that no mitigation has been confirmed at this stage. The ExA requests the applicant to submit mitigation proposals to address these significant effects, or to explain why further mitigation cannot be achieved.</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS considers that the Applicant's intra-project cumulative assessment (APP-059) focuses largely on identifying where different effects co-occur, rather than evaluating the combined experience of multiple effects on the same receptors over time (e.g. noise, HGV movements, severance, visual intrusion, dust, night-time lighting).</p> <p>The assessment frequently records individual effects as significant, but then does not clearly explain how multiple significant effects interacting together affect the overall level of impact on affected communities.</p> <p>In particular, the duration and persistence of combined effects arising from concurrent traffic, noise, visual intrusion, land take and construction activity are not evaluated as part of an integrated cumulative experience.</p> <p>As a result, while the presence of overlapping effects is acknowledged, the assessment does not provide a clear or transparent basis for understanding the overall significance of intra-project cumulative impacts on those receptors most exposed to multiple sources of disturbance.</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

1CEIntra2.	<p>Significant intra-project cumulative impacts and mitigation (ISH1)</p> <p>Can the councils comment on the applicant's response to AP8 regarding identification of significant effects [REP1-124] and AP9 with respect to the applicant's approach to mitigation of identified cumulative intra-project significant effects [REP1A-037]?</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS notes that the Applicant's approach to mitigating intra-project cumulative effects (REP1A-037, AP9) relies on the assumption that individual topic effects have already been reduced as far as reasonably practicable, with limited consideration of whether additional mitigation is needed to address the combined effect of multiple impacts occurring together.</p> <p>In practice, the assessment often concludes that no further mitigation is available for cumulative effects, without clearly explaining how the intensity, duration and interaction of those effects on the same receptors have been addressed.</p> <p>SEAS is concerned that reliance on Best Practicable Means, outline management plans and later contractor refinement effectively defers control of cumulative impacts to post-consent stages, rather than demonstrating at examination how cumulative effects would be mitigated in reality.</p> <p>Where multiple sources of disturbance arise concurrently (for example traffic, noise, visual intrusion and temporary land take affecting the same communities), the absence of clearly secured, integrated mitigation means the residual cumulative impacts remain uncertain.</p>
1CEInter1.	<p>Coordinated consideration of network projects</p> <p>Having regard to NPS EN1, paragraph 3.3.79 and 3.3.80, can the applicant explain how all avoidable disruption, inefficiency, and visual impacts etc have been taken account in the strategic and detailed stages of the proposed development having regard to other planned and new energy projects in Suffolk? Include</p>	<p><i>The question is not addressed to SEAS, but given SEAS's previously submitted relevant evidence, SEAS offers brief comments intended to assist the ExA.</i></p> <p>SEAS remains concerned that the inter-project cumulative assessment does not adequately reflect the scale, concentration and duration of major infrastructure projects affecting the same communities in East Suffolk. While individual projects are identified, the assessment largely considers effects project-by-project, rather than evaluating how multiple NSIPs (including Sea Link, Sizewell C, EA1N/EA2 and LionLink) would be experienced together by receptors over extended periods.</p>

SEAS Comments on ExQ1: 9 January 2026

We note that these questions are not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.

	<p>both spatial and temporal considerations in your answer. In answering, ensure that the response has regard to the relevant submissions from Suffolk and Essex Coast & Heaths National Landscape Partnership [REP1-270].</p>	<p>The assessment does not clearly evaluate the duration burden arising from overlapping or sequential construction phases, nor how prolonged exposure to repeated traffic disruption, noise, visual intrusion and access constraints would affect the same communities over many years.</p> <p>In addition, the inter-project cumulative assessment relies on linear scaling of effects by percentage completion, an approach that does not reflect how impacts arise in practice, where disruptive effects often peak during particular construction phases rather than declining proportionately. As a result, the assessment does not adequately capture the combined lived experience of concurrent traffic, noise, dust, lighting, PRow severance and landscape change affecting the same receptors, nor does it provide robust scenario testing of realistic overlapping construction programmes.</p> <p>Reliance on assumptions about programme separation and limited interaction between projects means that realistic scenarios involving overlapping construction activity are not robustly assessed. As a result, the inter-project cumulative assessment does not provide a clear or transparent basis for understanding the overall significance of cumulative effects on affected communities, and the scale of cumulative impact may be significantly understated.</p> <p>SEAS notes that the current stage of LionLink has been relied upon to limit cumulative assessment, notwithstanding that Sea Link design decisions have already taken potential interaction into account, making cumulative effects with LionLink reasonably foreseeable and appropriate to assess on a precautionary basis.</p>
--	--	--

end