

SEAS WRITTEN REPRESENTATION OF ISH2
CUMULATIVE EFFECTS

SEA LINK: EN020026

DEADLINE: 4 – 10 February 2026

SEAS IP: [REDACTED]

Date: 10 Feb 2026

PLANNING ACT 2008

EXAMINATION OF THE SEA LINK DEVELOPMENT CONSENT ORDER APPLICATION
SUFFOLK ENERGY ACTION SOLUTIONS' ISSUE SPECIFIC HEARING 2
MINUTE REGARDING: INTRA AND INTER PROJECT CUMULATIVE EFFECTS

1. Suffolk Energy Action Solutions (“SEAS”) has already set out extensive submissions and written evidence regarding cumulative effects, at relevant representation stage (see **AS-038**), written representation stage (see **REP1-278**, and the ExA is please asked to note that this written representation has been mislabelled in the Examination Library index, as relating to socio-economics, recreation and tourism), and SEAS’ comments on ExQ1 (**REP3-102**). Amongst others.
2. As explained at ISH2, Day 3, it is beyond dispute that the people of Suffolk SEAS represents and the land they cherish are facing a tsunami of major infrastructure projects without precedent nationwide.
3. The sensitivity of the context to what it is being asked to bear is clear, and the ExA already has ample confirmation of that from its colleagues’ report into the EA1N/EA2 DCO examination.
4. That there will be wide-ranging significant adverse cumulative effects, both intra-project and inter project, and as regards inter-project that even the construction effects alone (let alone operational) will occur over a period that can fairly be described as generational, is obvious.
5. Both law (the EIA Regulations), policy (see e.g. EN-1 at para. 4.15) and ultimately s.104 itself require these effects to be: (a) properly assessed; and (b) taken into account, including in the benefits/disbenefits balance.
6. However, the Applicant has signally failed to properly assess cumulative effects.
7. This places the ExA in an unenviable position in terms of reporting to the Secretary of State.

8. Consider, that whilst the DCO regime that this DCO Application is subject to is meant to be a front-loaded process, with the hard work of assessment done up front, including in response to pre-application consultation, this DCO Application is nothing but a stream of glaring deficiencies of assessment, either wholesale absences or what might as well be, that fail to provide any realistic sense of the cumulative impact.
9. Thus, across the piece the Appellant's work reflects a lack of necessary quantitative assessment, failure to assess substantively, repeated reliance on meaningless and uninformative qualitative assessment, denial of the long-term drawn out effects on people, flora and fauna, of construction year upon construction year of cumulative energy projects, then the essentially permanent operational phase, and a stubborn insistence that unless impacts overlap exactly temporally or spatially they are not to be counted. This, though, is not how people live and not how they experience, nor how wildlife and the landscape will be affected.
10. Equally, deficiencies in individual topic-area assessments, both as to the effects of this Proposal in isolation and the topic-area-specific assessment of cumulative effects, then knock on to multi-topic-area assessments.
11. By way of example:
 - (1) Traffic/transport: It is inexplicable that it is only now, after what is well over a year of denial on the Applicant's part (as the warnings date back before the Application was made), that the Application has finally promised some junction modelling. It is far too late, but better late than never. However, we can only guess at what data will be fed into that: the Applicant still refuses to accept that it is inappropriate it has used non-neutral month traffic data. Yet its approach flies in the face of the relevant guidance and good practice, as SEAS and PJA's Richard Ellam have already explained at length.
 - (2) Noise: Mr Thornley-Taylor has not only had to point the Applicant to the policy requirement for prediction of noise, he has also had to point out and explain some genuinely fundamental matters, even as to how to correctly approach assessment of the significance of low frequency noise, and to explain the noise effect of adding the noise of one transformer to another. We hope that a proper predictive noise assessment of the actual noise-generating equipment proposed here will emerge, but have limited confidence that it will.
 - (3) Tourism and the local economy: Once again, the Applicant is still in the starting blocks, if that, with no assessment worth the name. It has ignored the fundamental of cost in its assessment of available accommodation, has "assessed" (if it can be called that) blind to type of accommodation, has had no regard for the knock-on effect on the local rental market of workers taking accommodation out of that market,

and it has carried out no quantitative attitudinal survey and done nothing to establish a baseline, leaving it to East Suffolk Council to, belatedly, attempt to do so.

- (4) Landscape, visual impact, and heritage impact: the Applicant has wrongly dismissed any number of impacts for lack of spatial overlap, or simply because it has decided, rather arbitrarily, they are outside an area it considers affected.
- (5) The Applicant's repeated drumroll of "no significant effect" does not bear any kind of scrutiny, and instead destroys public faith in its work. The notion that the person whose tourism-dependent business is suffering due to removal of tourist discretionary spend replaced by salary-hoarding construction workers, who then experiences traffic problems every which way, and has to see the fruits of these projects imposed in harmful juxtaposition with the landscape, will not experience a significant adverse effect, is for the birds. And that is before we add on the years and years they will experience it over the construction phase alone.
12. In the context of people's lives being impacted for a generation by construction, and this beautiful, fragile, tranquil landscape changed for what will feel like perpetuity to those experiencing it, the Applicant's failures of assessment are inexcusable.
13. It is imperative that the ExA is provided with the right evidence against which to apply the policy tests, and to put into the balance. The Applicant has failed to do so. Whether it will make any progress in that regard in the lifetime of this examination is moot.
14. In terms of how the ExA should approach matters in reporting, SEAS suggests that the only appropriate approach, given the precautionary principle on which EIA is founded, is that the Applicant should be given no benefit of the doubt, and the Application should be assessed on the basis the Proposals impacts will be worst case.

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