SEAS WRITTEN REPRESENTATION OF THEIR
ISH2 ORAL REPRESENTATION on

NOISE and VIBRATION

SEA LINK: EN020026 **SEAS IP:** [redacted]
DEADLINE: 4 – 10 February 2026 **Date: 10 Feb 2026**

This document constitutes SEAS oral representation at ISH2 on Sea Link Noise and Vibration

Introduction

SEAS Council Mr. James Burton attended the Issue Specific Hearings (ISH2) on January 28, 29 and 30 January and introduced acoustic expert Ruper Thornley-Taylor to speak on behalf of SEAS.

Mr Ellam cautioned on various principles which were noted by the ExA.

We herewith, as requested, present his full written evidence as follows:

We trust that this submission will assist the ExA in its ongoing consideration of the application.

RUPERT TAYLOR
ACOUSTICS - NOISE - VIBRATION

RUPERT TAYLOR LTD
SAXTEAD HALL
SAXTEAD
WOODBRIDGE
SUFFOLK
IP13 9QT
UK

Sea Link DCO EN020026 - ISH2 29 January 2026

Noise evidence of Rupert Thornely-Taylor, Fellow of the Institute of Acoustics on behalf of Suffolk Energy Action Solutions (SEAS)

Agenda Item 14 - Noise and vibration

14.1 Construction noise assessment (including assessment assumptions, noise contour figures, s61 consents, mitigation and monitoring)

The applicant's conclusions in the Construction Noise and Vibration Assessment rely on a blanket mitigation effect of 10 dB applied in every case without any specific calculation to demonstrate that such a reduction is practicable. Should it in any case be found to be impracticable, the prediction of no more than minor significant effects will not be achieved. The Construction Noise and Vibration Management plan relies on a requirement to achieve "Best Practicable Means" and therefore if a mitigation measure capable of achieving a 10dB reduction proves impracticable, the stated results will not be achieved. The concept of Best Practicable Means comes from statutory provisions relating to mitigation of noise from sources in developments which either exist or have already undergone detailed design. When a development is at the application stage and has not been subject to detailed design, the definition of what is practicable is quite different as more fundamental design changes are possible. Explicit noise limits, including noise from construction, should be included as requirements in the DCO.

14.2 The need for operational noise limits at all operational sites

The Overarching National Policy Statement for Energy (EN-1) includes at section 15.12 16 paragraphs regarding Noise and Vibration. These include at 5.12.6 a requirement for "a prediction of how the noise environment will change with the proposed development". This is for operation and construction.

Paragraph 2.7.98 of EN-3 states "The Secretary of State should consider the noise and vibration impacts according to Section 5.12 in EN-1 and be satisfied that noise and vibration will be adequately mitigated through requirements attached to the consent."

Paragraph 5.12.12 of EN-1 states "Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation."

RUPERT TAYLOR
ACOUSTICS - NOISE - VIBRATION

RUPERT TAYLOR LTD
SAXTEAD HALL
SAXTEAD
WOODBRIDGE
SUFFOLK
IP13 9QT
UK

No noise or vibration prediction has been made by the applicant for the operation of this development. The ES (Appendix 2.9.D 1.1.1.) states in its introduction that it "does not provide a definitive indication of noise impacts from the proposed Saxmundham Converter Station" and instead presents "an assessment of noise from a 'generic' converter station with standard noise mitigation measures applied". Noise contours have been provided in "Document 9.82: Operational Noise Contour Plan for Saxmundham Converter Station" REP3-075, but these are labelled "indicative" and are therefore do not present the results of a prediction exercise specific to this proposal taking account of the actual noise sources and their engineering specifications which are to be installed if consent is granted.

At paragraph 5.12.17 EN-1 states "The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:

• avoid significant adverse impacts on health and quality of life from noise

• mitigate and minimise other adverse impacts on health and quality of life from noise

• where possible, contribute to improvements to health and quality of life through the effective management and control of noise.

The Secretary of State cannot be satisfied that those aims will be met, firstly because a prediction specific to this application has not been made in accordance with 5.12.12 of EN-1, and secondly the draft DCO contains no requirement specifying numerical limits on operational noise or in any other way giving effect to 2.7.98 of EN-3. The applicant is relying on future unspecified design effort to avoid significant effects and this could only be acceptable if it is demonstrated that the mitigation measures to be applied are feasible from an engineering point of view, and that achievement of the outcome relied on can be enforced through explicit Requirements contained within the DCO. The particular characteristics of the major potential noise sources involved in a development of this kind, including the fact that electrical transformers emit tonal noise which can result in both higher sound levels at receptors than general approaches to noise assessment predict, and cause more significant noise impacts than noise sources without these characteristics.

The requirements in the DCO for the current proposals are in strong contrast to those in the DCO for East Anglia One North and East Anglia Two which included explicit requirements for the control of cumulative noise at representative noise sensitive locations.

14.3 Operational noise impacts including low frequency noise

The Proposal here has characteristics which set it apart from most developments where noise effects are a potential issue. These include very low background noise levels, noise

RUPERT TAYLOR
ACOUSTICS - NOISE - VIBRATION

RUPERT TAYLOR LTD
SAXTEAD HALL
SAXTEAD
WOODBRIDGE
SUFFOLK
IP13 9QT
UK

with characteristics that can cause higher noise levels than predicted by simple models, and greater effects on human beings. In particular the main noise sources have tonal characteristics which necessitate special attention in the prediction and assessment process. The fact that the distances between sources and receptors are larger than normal means that predictions are subject to uncertainties in noise propagation effects.

An important issue is the potential for constructive interference between tonal noise from more than one transformer. The consequence of adding two tones constructively is an increase of 6 dB.

With regard to low frequency noise, a method of assessing its significance is to use dBC as well as dBA and if dBC-dBA is more than 10 dB then further consideration is necessary.

Conclusions

My expert view is, firstly, that the Examining Authority should, prior to reporting to the Secretary of State, require the applicants to carry out a full set of operational and construction noise predictions, taking into account the actual equipment, machinery and plant that it is intended to install, and applying site-specific mitigation measures based on the performance of actual noise reduction measures and not generic assumptions. The predictions should of course take fully into account corresponding predictions from other developments in the are which are capable of contributing to a cumulative effects. Secondly, the DCO should be amended to include requirements stating numerical noise limits for both operational and construction noise in the manner of other comparable Orders.

end