

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.111: Applicant's Response to Socio-economic, Tourism and Recreation and Health and Wellbeing Submissions

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1. Applicant's Response to Socio-economic, Tourism and Recreation, and Health and Wellbeing Submissions from previous deadlines

1.1 Introduction

1.1.1 Table 1.1 to 1.5 summarise the Applicant's responses to Socio-economics, Recreation and Tourism, and Health and Wellbeing matters raised by Interested Parties (IP) at previous submissions during examination.

1.1.2 This includes comments received by:

- **Application Document Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-104]** from Saxmundham Against Needless Destruction;
- **Application Document Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-103]** from Save Minster Marshes;
- **Application Document Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-068]** from Benhall and Sternfield Parish Council;
- **Application Document 10. SEAS Rebuttal of NGET's Socio-economic, Tourism and Recreation Responses [REP2-123]** from Suffolk Energy Action Solutions; and
- **Application Document 11. SEAS Rebuttal of NGET Health and Wellbeing [REP2-124]** Suffolk Energy Action Solutions.

1.1.3 This response has been provided at Deadline 4 to reflect further consideration of matters raised by IPs in their representations where it is felt this would be helpful to the Examination Authority (ExA), and to take account of points discussed during the Issue Specific Hearing held between 26 and 30 January 2026 (ISH2), ensuring that the Applicant's responses are informed by the examination process and address matters raised in a coordinated and up to date manner.

1.1.4 In addition, the Applicant has provided further consideration following initial response to REP1-279 within Table 2.40 of **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** regarding the Mind/ESC Survey Report cited by SEAs. This is submitted as Appendix A of **Application Document 9.111 Appendix Applicant's Response to MIND ESC Survey Report** submitted at Deadline 4.

Table 1.1 Applicant’s Comments on the Saxmundham Against Needless Destruction Deadline 2 Submission [REP2-104]

Reference Matter	Point Raised	Applicant’s Comments
6.7.7 Noise, Air Quality and Water Management	<p data-bbox="577 395 1144 421"><i>22 Noise and Health Impacts Minimised</i></p> <p data-bbox="577 485 1308 916">The Applicant acknowledges potential mental health impacts but claims mitigation will “reduce or avoid” them. This is speculative. Noise from reversing alarms, heavy machinery, and construction traffic is unavoidable and will cause stress, sleep disturbance, and reduced quality of life. Public health literature confirms that prolonged exposure to construction noise and dust contributes to respiratory illness, cardiovascular risk, and mental health decline. The Applicant’s reliance on embedded mitigation does not eliminate these risks.</p>	<p data-bbox="1323 395 2074 676">A response to this comment regarding adverse effects on community health and wellbeing can be found in Table 6.7 (against Reference 6.7.7) of Application Document 9.34.5 (B) Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-022]. This response addresses the matters raised in full.</p> <p data-bbox="1323 740 2074 1107">This response does not rely solely on embedded mitigation. It confirms that in light of the topic specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. This includes no significant effects arising from construction in relation to construction noise and dust that would materially affect health and wellbeing outcomes.</p> <p data-bbox="1323 1171 2074 1342">Cumulative effects are also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], which reaches the same conclusion.</p>

29. Cumulative and Temporal Effects Overlooked

The Applicant's modelling does not account for cumulative impacts from overlapping energy projects or peak construction traffic. Nor does it adequately consider temporal spikes, such as convoy movements or concentrated deliveries, which can cause short-term exceedances harmful to health. These omissions undermine the credibility of the "negligible" conclusion.

A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink based on the worst-case assumption that construction peaks of these different schemes would fully overlap. The assessment concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other developments.

30. Public Health Risks Understated

Particulate matter (PM10 and PM2.5) is linked to respiratory illness, cardiovascular disease, and childhood asthma. Even small increases in concentrations at sensitive receptors are significant for public health. The Applicant's dismissal of impacts as "not significant" ignores the precautionary principle and the duty under NPS EN-1 5.2 to protect human health.

The Applicant recognises that particulate matter can be associated with adverse respiratory and cardiovascular health outcomes and that protecting human health. These potential effects have been fully and appropriately considered within the **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** assessments.

A response to this comment regarding particulate levels and assessment of air quality is provided in Table 6.7 (against Reference 6.7.8) of **Application Document 9.34.5 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-022]**. This response addresses the matters raised in full and concluded particulate matter less than 10 microns in diameter

(PM10) and particulate matter less than 2.5 microns in diameter (PM2.5) concentrations were predicted to be negligible as a result of the Proposed Project. Construction vehicle emissions as a result of the Proposed Project were also determined as negligible (not significant). Vehicle emissions associated with the operation and maintenance and decommissioning phases were also determined to be not significant.

Considering these conclusions, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** concludes that the potential risk to human health is low and that, with mitigation in place, effects from dust and particulate matter during construction would be negligible (not significant), with at most a temporary minor adverse (not significant) effect for more sensitive sub-populations.

In reaching these conclusions, the Applicant has applied the requirements of NPS EN-1 paragraph 5.2, which seeks to avoid, mitigate and minimise risks to human health. Both **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** have been undertaken using recognised methodologies, including consideration of worst-case scenarios at sensitive receptors and more vulnerable sub-populations. The conclusion that effects are “not significant” is the outcome of a robust and precautionary assessment which demonstrates that, with appropriate mitigation in place, predicted

			<p>particulate matter concentrations would remain well below relevant health-based thresholds. Accordingly, the Applicant considers that the Proposed Project complies with NPS EN-1 paragraph 5.2 and that no significant residual risks to human health are anticipated.</p>
6.7.13	Working Hours and Community Disruption	<p><i>37. Programme Flexibility vs. Community Wellbeing</i></p> <p>The Applicant justifies extended hours as necessary to meet Government Clean Energy Action Plan targets. National policy does not permit community wellbeing to be sacrificed for programme convenience. EN-1 4.2.11 requires applicants to minimise disruption to local communities.</p> <p>Seven-day working prioritises project scheduling over residents' health, amenity, and quality of life.</p>	<p>A response to this comment regarding working hours is provided Table 6.7 (against Reference 6.7.13) of Application Document 9.34.5 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-022]. This response addresses the matters raised in full.</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses health and wellbeing effects based on the current assumption of working hours as set out in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. No significant adverse effects are identified with regards to human health.</p>
6.7.18	Cumulative Impact Assessment	<p><i>60. Community Capacity Exceeded</i></p> <p>The Applicant dismisses impacts on housing and public services, claiming sufficient accommodation capacity. This ignores cumulative demand from multiple NSIPs. Local housing markets, emergency services, and health provision are already under strain. The influx of construction workers, combined</p>	<p>The Applicant recognises that the Proposed Project could impact on the capacity of public services. Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] assesses the impact of the Suffolk Onshore Scheme on primary health care and social infrastructure. The assessment concludes that the Suffolk Onshore Scheme would have a negligible (not significant) effect on social infrastructure and primary health care provision locally.</p>

with traffic congestion and noise, will exceed local capacity and erode community wellbeing.

Additionally, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects Assessment [APP-060]** assesses the cumulative impact of the Suffolk Onshore Scheme in combination with other major Nationally Significant Infrastructure Projects (NSIPs) on social infrastructure. As set out in Table 13.43, this considers a worst-case scenario, whereby the peak construction workforce for the Suffolk Onshore Scheme and the construction of each of the other developments coincide, and each worker demands primary healthcare, there is likely to be additional demand on local facilities. The additional demand has the potential to increase the GP: Patient Ratio, however, even in the worst-case the ratio is predicted to remain broadly in line with the recommended provision. Therefore, no significant cumulative effects are anticipated. The Applicant is engaging and continues to engage with landowners, as set out in **Application Document 4.2.2 (D) Statement of Reasons Appendix B Schedule of Negotiations with Land Interests [REP3-016]**. This document will continue to be updated throughout the Examination. Further response to this comment regarding impacts on housing prices is provided in Table 7.13 (against Reference 7.13.4) of **Application Document 9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024]**.

The Applicant notes there are concerns regarding the potential for adverse impacts on local accommodation. **Application Document 6.2.2.10**

(B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] concludes that there are no significant effects anticipated on local accommodation capacity arising from the Suffolk Onshore Scheme, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required.

The Applicant is working closely with Sizewell C and SPR to explore ways that the impacts of construction workers traveling to site and staying in the local area could be minimised. The Applicant has had several meetings with Sizewell C, discussing the shared use of the Park and Ride Facilities being built by Sizewell C, the buses that they are providing for workers from Ipswich Train Station and any future initiatives they are planning. The types of construction workers used for the Proposed Project are more likely to stay in hotels within cities and large towns where they have access to other facilities based on experience from other National Grid projects.

Cumulative
Impact
Assessment

6.7 Cumulative Strain on Emergency Services

The Applicant fails to consider cumulative impacts. With Sea Link, Lion Link, EA1N/EA2, and Sizewell

A response to this comment regarding strain on emergency services provided Table 6.7 (against Reference 6.7.12 and 6.7.18) of **Application Document 9.34.5 (B) Applicant’s Detailed Responses to the Relevant Representations**

C overlapping, emergency services will face increased demand from construction incidents, traffic accidents, and community health impacts. Ignoring this cumulative strain undermines the credibility of the assessment.

identified by the ExA [REP2-022]. This response addresses the matters raised in full.

Table 1.2 Applicant’s Comments on the Save Minster Marshes Deadline 2 Submission [REP2-103]

Reference Matter	Point Raised	Applicant’s Comments
6 Economic and Social Impacts	The applicant has again reiterated this point that the local area will benefit by £1.1million. But there are no employment opportunities and no quantifiable benefits at all presented in any of their documentation. What is this figure based on?	<p>Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1-007] assesses the impact of the Kent Onshore Scheme on employment generation (locally and within the supply chain) and gross value added (GVA). Applying the average gross direct value added per construction worker in the South East of England to the total number of construction workers generated from the Kent Onshore Scheme gives the total GVA arising from the construction period. Based on ONS data (Office for National Statistics, 2024) on regional gross value added by industry, in 2024 in the South East, GVA per worker in the construction sector is estimated to be £72,671 per head. By applying this figure to the average net employment generated by the Kent Onshore Scheme (15 Full-Time Equivalent (FTE)), it is estimated that construction will contribute approximately £1.1 million within the 60-minute drive time Study Area.</p> <p>As set out in Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation</p>

and Tourism [REP1A-007], the number of jobs supported by the Proposed Project is relatively low and short-term, when considered in isolation. The average construction workforce required for the Kent Onshore Scheme is 67 FTE per annum respectively. However, the Applicant recognises the importance of realising local skills and employment opportunities and is looking to discuss the terms and develop Skills and Employment Plans in liaison with the local planning authorities. The Applicant intends to submit outline Skills and Employment Plans at Deadline 6. The Applicant will arrange meetings to progress and discuss suitable opportunities that will form the outline plans with the local authorities.

In addition, NG states there are “four visitor attractions within 500m of the Onshore Scheme Order Limits” but then has only assessed the impact of Sea Link on just one of those - Richborough Roman Fort. One of the four is the Viking Ship Hugin which will be severely impacted not only by the original plans but by NG’s proposed use of the hoverport. No impact assessment has been provided.

A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1-007]**. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.

The are four visitor attractions, including Viking Ship Hugin, within the 500 m of the Kent Onshore Scheme. As set out in Section 10.9, no significant effects on any receptors are anticipated. Additionally, **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** concludes there are no roads assessed that would experience significant severance effects during construction. Therefore, there are no significant severance effects identified between residents and local assets.

Amenity impacts on receptors are assessed in **Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on local businesses arising from construction of the Kent Onshore Scheme.

The Applicant notes that Footpath TR33 is used to access the Old Hoverport and Viking Ship Hugin. Heavy Goods Vehicle (HGV) movements on the access track will interact with this PRow and has the potential to compromise user experience on the footpath. However, movements are only expected for 6 months of the construction phase and the mitigation measures proposed are appropriate and allow the routes to remain open and usable for the duration of the construction period. For example, site fencing and crossing gates will be installed to separate construction vehicles and Public Rights of Way (PRow) users, which will be monitored when in use. Further details of this management are set out within **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**. Therefore, no significant effects are anticipated on this route or tourist attraction as a result of the Kent Onshore Scheme.

The Applicant is setting up meetings with the local planning authorities to discuss the potential for monitoring impacts on visitors and tourism following the grant of development consent (if granted). The Applicant is also reviewing potential opportunities to liaise with tourism related businesses to seek their views on how tourism impacts cannot be minimised.

7 - Health	Traffic, Pollution and Health	<p>NG dismisses disruptions to PRowS like the King Charles III Coastal Path (up to eight hourly closures for HGVs) as “negligible” yet this fragments active travel routes, deterring users and compromising physical and mental health benefits contrary to IEMA 2022 guidance emphasised in ES Chapter 11 (APP-071). The permanent rerouting of the Way of St Augustine (an important pilgrimage route) is undervalued, with sensitivity classifications (very high/medium) not translating to adequate protection and dismissed as ‘not significant’. The embedded mitigation in the Outline PRow Management Plan (APP-353) offers no specifics on diversion quality or accessibility. For example, It would be mortally dangerous to have footpath TE26 which runs along the banks of the River Stour open alongside construction vehicles, yet nets are suggested. This protection is wholly inadequate.</p> <p>Critically, impacts on Great Oaks Small School (SEN-focused) are ignored entirely; there is no assessment of noise, vibration, dust, or traffic encircling the site, which could severely disrupt vulnerable pupils' education and wellbeing, violating equality duties under the Equality Act 2010. NG has said that the impact of their construction on the pupils at Great Oaks will be ‘negligible’ in their ‘professional judgement’. What is their expertise in neurodiversity? NG has also stated they will only work in school holidays (AS-030) and that they will also avoid working in breeding season (APP-341) and on wet soil (APP-355). The ExA must ask to see a complete timetable which addresses each of these commitments as in our view this timetable is</p>	<p>A response to this comment regarding the disruptions to PRowS can be found in Table 6.7 (against Reference 2.9.12) of Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]. Specifically, the Environmental Statement (ES) does not dismiss PRow disruption as negligible. Temporary, managed closures affecting routes such as the King Charles III Coastal Path and the Way of St Augustine (Viking Trail/NCN 15) are assessed in Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. With embedded mitigation secured in the Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], routes remain open and usable, and there is no sustained loss of access or user experience. Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] considers these conclusions to assess effects on health and wellbeing in line with IEMA (2022) and concludes that, with embedded mitigation in place, the likely effects of the Proposed Project on access to open space and PRow, (including the King Charles III Coastal Path and the Viking Trail (NCN 15)) will not be significant during either construction or operation.</p> <p>Regarding Great Oaks Small School, the Applicant recognises the concerns raised regarding the potential effects of the Proposed Project on vulnerable pupils' education and wellbeing. The facility is located</p>
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impossible to implement within proposed construction timescales.

approximately 620 m to the west of the proposed Minster Substation and Minster Converter Station.

Potential effects arising from the construction of the Kent Onshore Scheme that can impact on the amenity and wellbeing of residents within 500 m of the Order Limits have been comprehensively assessed in **Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**. This chapter adopts a systematic, evidence-led approach in line with best practice guidance, including the IEMA (2022) Health Impact Assessment guidance, and draws on a wide range of public health, socio-economic and environmental data, including indicators relevant to mental health and wellbeing.

The assessment considers vulnerable groups, including children, older people, those receiving care, and individuals with pre-existing physical or mental health conditions, through the application of sensitivity classifications. This approach ensures that differential health outcomes and the potential for disproportionate effects on more sensitive populations are appropriately identified and assessed. The assessment considers a range of potential health and wellbeing pathways associated with construction activities, including noise disturbance, visual amenity, air quality, community severance, and physical health outcomes such as physical activity and respiratory health.

Specifically, the potential effects associated with construction traffic on Jutes Lane (where Great Oaks Small School is located) have been assessed within **Application Document 6.2.3.7 Part 3 Kent Chapter 7**

Traffic and Transport [APP-067]. This states that Jutes Lane will be used only as a secondary access route, with a very small proportion of construction vehicles (circa 1% in total, and less than 1% HGVs), limited to LGVs where possible, in line with the Traffic and Transport assessment and CTMP in **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent [APP-338]**. This assessment identifies Jutes Lane as having negligible significance in relation to severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay, road safety, and hazardous loads. A number of mitigation measures have been developed by the traffic and transport topic which will help to minimise adverse effects. Section 7 of **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts during the construction phase. Monitoring and enforcement are also embedded through **Application Document 9.83 Outline Code of Construction Practice [REP3-076]**, **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]**, and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]**, which outlines all mitigation measures and assigns responsibility for implementation and monitoring.

Noise and vibration effects during construction are assessed in **Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration [AS-111]**, which

identifies Great Oaks Small School as a noise sensitive receptor. A threshold of 5 dB below the Significant observed adverse effect level (SOAEL) has been applied to this receptor following discussions with the local authority. Construction noise levels are predicted to not exceed 5 dB below the SOAEL, without mitigation, and as such the effects of construction noise would be not significant. However, Best Practicable Means (BPM) will still be applied to works in the vicinity of this receptor to further reduce the potential effects of construction noise. **Application Document 7.5.8. 2 Outline Construction Noise and Vibration Management Plan - Kent [AS-133]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** includes a requirement for the contractor(s) to undertake detailed construction noise assessments based on their specific construction methodologies. Specifically, in the latter document, additional mitigation is proposed at noise sensitive receptors, to apply site -specific BPM (e.g. screening) to reduce levels of noise and vibration from potentially significant construction activities

The construction dust risk assessment within **Application Document 6.2.3.11 Part 3 Kent Chapter 8 Air Quality [APP-068]** has identified high sensitivity human receptors within the study area, including Great Oaks Small School. Effects on air quality have been assessed which concludes that effects on such human receptors would be negligible, with annual mean PM10 and PM2.5 concentrations at all assessed receptors not significant. Mitigation measures presented in **Application Document 9.83 Outline Code of Construction Practice [REP3-076]**, **Application**

Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] and **Application Document 7.5.6.2 (B) Outline Air Quality Management Plan - Kent [REP3-054]**, outline the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively.

In addition, this property is unlikely to experience views of the permanent infrastructure (converter and substation). As such, these are not considered to give rise to potentially significant visual effects.

In light of the topic-specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, noise, or landscape & visual that would materially affect health and wellbeing outcomes. The Applicant therefore considers that the conclusions presented in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**, whereby Great Oaks Small School is specifically assessed under the determinant *access to social infrastructure*, that no significant effects are identified, remain valid, proportionate, and evidence -based.

To clarify, the works are limited to short-duration utility trenching near the School, expected to last around one week, with access maintained and works programmed during school holidays or as agreed with the School. The Applicant has engaged with Great Oaks Small School and will continue engagement through

examination and construction, if consent is granted. The embedded mitigation included in Section 10.8 of **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism [REP1A-007]** includes: “*Utility trenching works to be programmed to occur in school holidays or as agreed with Great Oaks Small School to avoid impacts on users of the community facility receptor.*”

Table 1.3 Applicant’s Comments on the Benhall and Sternfield Parish Council Deadline 2 Submission [REP2-068]

Reference	Matter	Point Raised	Applicant’s Comments
n/a	Cumulatives	Now that Nautilus is going to Grain however, Sea Link’s needs case has changed significantly, but despite the ExA’s warnings regarding the cumulative impacts of connecting further projects at Friston, National Grid seems to be ploughing on nonetheless and is seeking to create a new and different needs case to the one that the original Sea Link application was based on. This is a disingenuous retrospective planning approach that seems to be proceeding without taking the considerable cumulative impacts, the socioeconomic	The Applicant acknowledges the concern raised regarding potential cumulative effects and community wellbeing. These matters have been fully considered through a comprehensive Health and Wellbeing assessment, including an assessment of inter-project cumulative effects. The cumulative impact is assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] . No significant adverse effects are identified with regards to human health and wellbeing due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as ‘not significant’.

and environmental costs or the wellbeing of the local community into account at all.

The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are three relevant developments that have potential to result in cumulative effects upon shared residential properties, business premises, visitor attractions, community facilities and open space receptors. However, following further analysis, no significant cumulative effects on socio-economics, recreation and tourism are expected as a result of the Suffolk Onshore Scheme. Further information is provided in **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.

Additionally, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** also assesses the cumulative impact of the Proposed Project alongside five other NSIPs, on construction workforce generation, construction workforce labour supply, GVA, social infrastructure and local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required.

The Applicant is setting up meetings with the local planning authorities to discuss the potential for monitoring impacts on visitors and tourism following the grant of development consent (if granted). The Applicant is also reviewing potential opportunities to liaise with tourism related businesses to seek their views on how tourism impacts can be minimised.

The Applicant is also working closely with Sizewell C and SPR to explore ways that the impacts of construction workers traveling to site and staying in the local area could be minimised. The Applicant has had several meetings with Sizewell C, discussing the shared use of the Park and Ride Facilities being built by Sizewell C, the buses that they are providing for workers from Ipswich Train Station and any future initiatives they are planning. The types of construction workers used for the Proposed Project are more likely to stay in hotels within cities and large towns where they have access to other facilities based on experience from other National Grid projects.

Table 1.4 Applicant’s Comments on the SEAS Socio-economics, Recreation and Tourism Deadline 2 Submission [REP2-123]

Reference	Matter	Point Raised	Applicant’s Comments
1	Introduction / New Material	<p>This written representation responds directly to the Applicant’s replies to SEAS’s Relevant Representation on socio-economics, tourism, and recreational amenity. While the Applicant introduces a limited amount of “new evidence”, none of it meaningfully addresses the substantive points raised, nor does it satisfy the requirements of National Policy Statement EN-1 or local plan policy.</p> <p>Much of the Applicant’s new material relies on inappropriate comparisons, selective use of external case studies, assumptions contrary to observed tourism behaviour, and assessments driven by arbitrary methodological constraints. At no point does</p>	<p>The Applicant prepared an Environmental Statement in accordance with relevant national, regional and local planning policy, EIA regulations and guidance and methodology and approaches used by other comparable NSIPs. Section 10.2 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] sets out how the socio-economic, recreation and tourism assessment meets the requirements of regulatory and planning policy, including the NPS EN-1, National Planning Policy Framework and Suffolk Coastal Local Plan.</p>

		the Applicant provide the evidence that SEAS identifies as missing: robust local visitor perception data, tourism vulnerability analysis, displacement modelling, or economic impact quantification.	
2.1	Misuse of Comparison with Other NSIPs	<p>2.1 The Applicant relies heavily on evidence from Sizewell B, Sizewell C, Hinkley Point C, EA1N and EA2.</p> <p>These projects are:</p> <ul style="list-style-type: none"> • larger in scale, • differently located, • not clustered around fragile tourism-reliant coastal villages, and <p>not operating concurrently with up to three other NSIPs, as Sea Link would.</p>	<p>The assessment of private, community and recreation assets are assessed within 500 m of the Suffolk Onshore Scheme Order Limits, in terms of any temporary or permanent land take impacts and severance of access. The study area of 500 m was determined based on experience from other NSIPs and Design Manual for Roads and Bridges (DMRB) LA 112: Population and human health guidance, as this is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. However, as noted by SEAS, where deemed appropriate, receptors that lie outside of the study area have also been identified and assessed. This approach has been adopted to allow for flexibility within the assessment.</p>
2.2	Misuse of Comparison with Other NSIPs	<p>2.2 The Applicant admits negative visitor perceptions were recorded, yet argues these were not realised in practice.</p> <p>This overlooks the central point: Sizewell C is not yet built, and Sizewell B was constructed in the 1980s under entirely different tourism, transport, and population conditions. Moreover:</p> <ul style="list-style-type: none"> • Hinkley Point C is located in an area without a high-value tourism brand comparable to Aldeburgh, Thorpeness or Snape Maltings. • None of these comparator NSIPs were concurrent with as many overlapping projects as the Suffolk coast now faces. 	<p>Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] concludes that no significant effects on socioeconomic, recreation and tourism are anticipated as a result of the Suffolk Onshore Scheme. Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065] has been produced to support the assessment of visitor and tourism impacts associated with the Proposed Project in</p>

		Therefore, the Applicant’s reliance on unrelated NSIPs is not evidence-based mitigation. It is a methodological deflection.	Suffolk and respond to concerns regarding potential adverse effects on visitor numbers, spending, and perception. This technical note reviews observed impacts from Sizewell B and monitoring reports for Hinkley Point C. The Applicant’s review found that initial concerns observed in surveys have not translated into measurable reductions on visitor numbers of tourism related employment. On that basis there is limited robust evidence to suggest that negative visitor perception identified/observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] .
3	Failure to Provide Local Tourism Evidence Despite Admitting Visitor Perception is Relevant	<p>The Applicant concedes:</p> <ul style="list-style-type: none"> • Visitor perception can influence behaviour. • SEAS raises legitimate concerns about perception-based impacts. <p>Yet the Applicant:</p> <ul style="list-style-type: none"> • Conducted no visitor survey, • Conducted no business impact survey, • Conducted no visitor spend or displacement modelling, • Conducted no assessment of tourism brand vulnerability, • Declined to engage with major cultural organisations such as Britten Pears Arts, despite their clear relevance. <p>The Applicant’s justification—that surveys are “hypothetical”—is contradicted by:</p> <ul style="list-style-type: none"> • Standard EIA practice, • The Energy Coast BVA-BDRC survey (ISO 20252 certified), • National Policy Statement EN-1, which explicitly requires assessment of likely significant effects. <p>A hypothetical effect is still a likely effect when the brand is fragile, local concerns are strong, and the destination is known for tranquillity.</p>	<p>The Applicant considers these NSIPs to be appropriate comparators for the Proposed Project. Each of the cited projects are energy infrastructure developments located in sensitive coastal environments, including areas with high landscape, or environmental value such as National Landscapes, and are therefore relevant when considering potential effects on tourism and visitor assets.</p> <p>Sizewell C, Sizewell B and Hinkley Point C are substantially larger in scale than the</p>

Proposed Project and consequently represent a worst-case scenario, with a greater potential for construction and operational effects. In contrast, the Proposed Project is a much smaller scheme with a more limited construction workforce and duration and therefore has the potential for significantly fewer and more localised effects. Given the scale and location of these comparator schemes, their inclusion provides a conservative and appropriate benchmark for assessing the likely effects of the Proposed Project, which is expected to result in more limited impacts by comparison.

The socio-economic, recreation and tourism project's team has engaged through a series of thematic meetings with the local planning authorities (LPAs) in Suffolk, providing a structured forum for to raise questions, concerns and local context to inform the assessment.

While primary visitor perception surveys can offer qualitative insight, their use in impact prediction is subject to methodological limitations, including issues of sample representativeness and the interpretation of stated responses as actual behavioural change. The Applicant would like to clarify the point regarding surveys being described or interpreted as 'hypothetical'. As set out in **Application Document 9.40 Visitor and**

Tourism Assessment Technical Note – Suffolk [REP3-065], the limitations of surveys have been highlighted. These arise because they rely on respondents predicting future and ‘hypothetical’ behavioural changes which, as evidence shows, does not translate into material effects.

4.1	The Applicant’s Cumulative Assessment Is Not a Substitute for Evidence	<p>The Applicant claims ‘no significant ‘cumulative effects’ on:</p> <ul style="list-style-type: none">• Traffic,• Accommodation,• Tourism,• Landscape,• PRow users. <p>Yet the Applicant’s cumulative assessment:</p> <ul style="list-style-type: none">• Assumes full accommodation capacity is accessible to workers, ignoring seasonal tourism peaks;• Uses a 60-minute drive time catchment, which is unrealistic for shift workers and unrepresentative for tourism;• Relies on a 500m radius for receptor sensitivity, despite acknowledging that receptors beyond this may still be affected; <p>Does not account for multiple simultaneous NSIP traffic management regimes, each of which individually concedes significant county-wide pressures.</p>	<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] presents an assessment to evaluate whether existing tourism and private rental accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment accounts for seasonal variations in tourism demand, including peak visitor periods, through applying seasonal occupancy rates for hotels, bed and breakfasts and inns derived from Visit England. This ensures that the assessment reflects realistic worst-case conditions when accommodation availability is most constrained.</p> <p>The study area of 60-minutes has been determined in line with Research by the Chartered Institute of Personnel and Development (CIPD) which found that 90% of national employees commuted for 60 minutes or less each way. On that basis, 60 minutes was selected as the study area for home-based construction workers.</p>
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The assessment considers impacts on these receptors within a 500 m study area from the Proposed Project's order limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. Where appropriate, receptors located beyond 500 m of the Suffolk Onshore Scheme have been included in the assessment to allow for assessment flexibility.

A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other major projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects including Sizewell C, LionLink, and Scottish Power Renewables (SPR) projects and concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other schemes. The cumulative assessment is based on the worst-case assumption that the peak construction phases of the Proposed Project and other cumulative schemes would fully overlap which is not a scenario that is expected to arise (this was discussed during

Issue Specific Hearing 2, also see **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**). Therefore, the findings are robust. **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** includes defined construction routes and traffic control measures to reduce the potential impacts of construction traffic associated with the Proposed Project.

4.2	The Applicant's Cumulative Assessment Is Not a Substitute for Evidence	<p>The Applicant relies on a future document (9.26) to address cumulative traffic effects.</p> <p>This confirms that:</p> <ul style="list-style-type: none">• the original ES was inadequate,• cumulative traffic has not been robustly assessed, and• Sea Link anticipates meaningful cumulative pressures. <p>A cumulative assessment made post-application is not mitigation, it is an admission.</p>	<p>The Applicant stands by the original traffic and transport cumulative assessment contained within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] which provides a comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network, based on the worst-case assumption that construction peaks of different schemes would fully overlap.</p> <p>Since the submission of the DCO application, Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110] was produced following a meeting with Suffolk County Council (SCC) and East Suffolk Council (ESC) on 6 August 2026, to provide the Local Authorities with further details on the methodology and findings of the original cumulative assessment work, including with respect to the forecast construction programmes and potential</p>
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overlaps of different projects. This document supplements, and in no way replaces, the original traffic and transport cumulative assessment contained within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.

Following the preparation of the above, the conclusion remains that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in paragraph 1.27 of the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement).

5	New Routing Information Does Not Address Tourism Impacts	The Applicant provides previously unstated commitments: <ul style="list-style-type: none"><li data-bbox="739 1133 1332 1204">• HGVs will not pass through Snape or Thorpeness,<li data-bbox="739 1228 1332 1268">• Aldeburgh will see only 10 HGVs/day,<li data-bbox="739 1292 1332 1364">• A temporary haul road will carry most traffic	The Applicant considers that the majority of the points raised by SEAS have been raised before in their previous submissions. The Applicant has previously responded to these points raised by SEAS within Table 30.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 2.57 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the
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While these statements appear reassuring, they do not:

- Account for non-HGV traffic, which typically increases ten-fold on NSIP projects,
- Consider tourist-season peak conditions,
- Address severe congestion on the A1094 and B1122,
- Consider Light Goods Vehicles, staff vehicles, abnormal loads and construction plant transport,
- Mitigate up to six years of intermittent delay and disruption

Moreover the Applicant provides no modelling outputs demonstrating that visitor behaviour will not change due to congestion and loss of perceived tranquillity.

Relevant Representations identified by the ExA [REP2-014].

Nonetheless and to reiterate, 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, including HGVs, Light Goods Vehicles (LGVs) and staff vehicles. This concludes that, with the management and mitigation identified within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan - Suffolk [CR1-041]** that there is not expected to be the potential for any significant effects as a result of construction traffic associated with the Proposed Project, including in terms of Driver Delay along the A1094 and the B1122. Indeed, the routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston).

With respect to modelling, the Applicant has not previously carried out any junction modelling given that the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network at the busiest times (during the network peak hours) and

that peak construction traffic levels will be short-term and temporary in duration. Nonetheless, in response to the Examining Authority’s Written Question 1TT11 and following further discussion with Local Planning Authorities, junction modelling will be carried out at ‘critical junctions’ on key construction traffic routes utilising previously collected traffic data and cumulative traffic forecasts to allow this to be completed within the timescales of Examination. The proposed scope of the junction modelling will be reviewed and agreed with the Local Highway Authorities.

Given the conclusion presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** that there would be no significant driver delay effects on the surrounding highway network, including along routes used by visitors, there is no reasonable basis to assume a material change in visitor behaviour as a result of construction traffic. Any changes to traffic conditions would be short-term, temporary and managed through the mitigation measures secured via the Outline Construction Traffic Management and Travel Plan.

6	Landscape and Visual Impact Evidence is Selective	<p>The Applicant cites:</p> <ul style="list-style-type: none"> Two viewpoints (13 and 18) showing “minor” or “negligible” effects. <p>This is highly selective. It ignores:</p>	<p>The Applicant disagrees that its assessment is selective or that it understates the sensitivity of the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (SECHAONB). The Applicant’s response to SEAS, as set out</p>
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- The AONB’s sensitivity to industrialisation,
- The cumulative visual presence of Sea Link, LionLink, EA1N, EA2 and Sizewell C,
- The National Landscape’s statutory purpose,
- The importance of tranquillity (explicitly identified by DEFRA and the East Suffolk Tourism Strategy).

in **Application Document 9.34.1 Applicant’s Comments on Relevant Representations Identified by the ExA [REP2-014]**, was focused specifically on concerns raised in relation to Aldeburgh, Thorpeness and Snape. Viewpoints 13 and 18 were therefore selected as representative viewpoints for these locations rather than as an exhaustive summary of effects across the AONB.

The Applicant’s own cumulative assessment concedes:

- Temporary significant adverse effects on the AONB and Heritage Coast when considered with EAN1, EA2 LionLink, Essex and Suffolk Water recycling, and other NSIPs.

The Applicant’s response also references the LVIA in relation to tranquillity and the AONB. Effects on tranquillity have been considered where relevant to the landscape receptor, including the SECHAONB and Landscape Character Area B4 (Fromus Valley), within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**.

This point alone contradicts the Applicant’s narrative of “no significant socio-economic effects”.

The landscape and visual inter-cumulative assessment (**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**) set out in Table 13.35 identifies that there are likely to be residual significant cumulative effects on representative viewpoints.

The applicant does not believe the conclusions of the LVIA would materially impact the tourism industry in the long-term. As detailed in **Application Document 9.40 Visitor and Tourism Assessment Technical**

Note – Suffolk [REP3-065], the Applicant’s review of published monitoring reports of actual impacts on tourism observed from other NSIPs found there to be no material effects on visitor numbers or tourism-related employment.

7	PRoW and Recreation Impacts Remain Under-assessed	<p>The Applicant claims:</p> <ul style="list-style-type: none">● PRoW diversions will maintain equivalent quality. <p>However:</p> <ul style="list-style-type: none">● No user data was collected,● No seasonal variation in usage was assessed,● No landscape experiential analysis was conducted,● “Equivalent” is judged through internal criteria, not user consultation. <p>Popular coastal and inland walks are a core tourism attraction. Long-term disruption for up to six years cannot reasonably be considered “minor” or “negligible”.</p>
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Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes.

The assessment methodology adopted is comprehensive, proportionate and consistent with established guidance. A robust approach has been taken, using a desktop-led assessment in line with assessments of other comparable infrastructure schemes. The Applicant has engaged through a series of thematic meetings with the local planning authorities in Kent and Suffolk, providing a structured forum for LPAs to raise questions, concerns and local context to inform the assessment. In addition, as set out in Appendix A of **Application Document 9.45 Approach to Assessment of Public Rights of Way [REP1-119]**, PRoW methodology technical notes were developed following engagement with the local authorities to provide further clarity on the assessment approach. These notes covered both Suffolk and Kent. The guidance in these technical notes generally aligns with the Public Rights

of Way and Green Access Supplementary Planning Guidance released by Suffolk County Council in July 2024.

User surveys were not undertaken due to recognised limitations with surveying representative samples.

Where a PRoW or recreational route has been temporarily or permanently diverted, an equivalent diversion has been provided and is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**. An equivalent route is established based on the existing routes' nature, length and connectivity to the wider PRoW network. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. This is assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and considers *“potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health”*. This assessment draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the

			landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant effects on social cohesion and community identity, including amenity impacts on PRoW and other recreational receptors.
8	The Applicant's Repeated Claim of 'No Significant Effects' is Unsupported	<p>In each category—tourism, landscape, socio-economics, health & wellbeing—the Applicant asserts:</p> <ul style="list-style-type: none"> • “no significant adverse effects”. <p>Yet:</p> <p>The Applicant provides</p> <ul style="list-style-type: none"> • no quantification of tourism sensitivity, • no analysis of economic displacement, • no assessment of brand degradation, • no modelling of post-construction recovery timelines, • no analysis of cumulative perception effects, • no primary data collected from visitors, local businesses, or cultural institutions. <p>A conclusion reached without evidence cannot rebut a concern supported by evidence.</p>	<p>The Applicant prepared an Environmental Statement in accordance with relevant national, regional and local planning policy, standard EIA regulations and methodology and approaches used by other comparable NSIPs. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] details the assessment of effects on tourist attractions and visitor and tourist accommodation. The assessment concludes that no significant effects on socioeconomics, recreation and tourism are anticipated as a result of the Suffolk Onshore Scheme.</p> <p>Section 10.4 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] sets out the methodology for assessing sensitivity and magnitude of socio-economics, recreation and tourism receptors. Sensitivity is assigned to tourism attractions on a receptor level basis to account for variation in sensitivity between assets. Sensitivity is assigned to recreation and</p>

tourism assets qualitatively (negligible to very high) based on the receptor's local importance, uniqueness, accessibility and availability of alternative services providing an equivalent experience in the area.

Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** assesses the potential effects of the Proposed Project on construction workforce generation. The calculation of construction workforce generation accounts for additionality impacts, including a 50% displacement factor, in line with MHCLG Additionality Guidance and HCA Additionality Guide. This assessment measures the extent to which the benefits of the Proposed Project are offset by reductions in output or employment elsewhere. Applying the 50% displacement factor acknowledges that additional demand for labour cannot simply be treated as a net benefit and therefore is reduced to the extent that this occurs.

The Applicant's review of tourism surveys from other NSIPs (as referenced in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**) provides additional clarity and detail to support the assessment methodology and conclusions in **Application Document 6.2.2.10 (B) Part 2 Suffolk**

Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]. The review demonstrates that results from visitor perception surveys do not consistently translate into measurable impacts on visitor numbers or activity and therefore do not provide a robust basis for assessing potential impacts on tourism. Evidence from the monitoring and realised impacts from Sizewell B and Hinkley Point C illustrate how construction activities for other energy projects have interacted with tourism-dependent locations in practice. This demonstrates behavioural resilience in visitor numbers and activity in areas exposed to large construction projects.

9	Policy Non-Compliance Remains Unresolved	<p>The Applicant's new material does not fix fundamental non-compliance with:</p> <ul style="list-style-type: none"> ● NPS EN-1 paragraphs 5.13.2–5.13.4, ● Local Plan policy SCLP3.4(m) (tourism safeguard), ● SCLP10.4 (protecting rural character), ● SCLP12.26 (protecting visitor appeal in coastal communities). <p>The Applicant continues to:</p> <ul style="list-style-type: none"> ● dismiss qualitative impacts, ● minimise cumulative pressure, ● ignore brand-based harm, ● rely on inappropriate comparator NSIPs. 	See response to <i>Reference 1 - Introduction / New Material</i> in this Table (Table 1.4) above.
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		Thus, the Applicant has still not met minimum policy requirements for socio-economic impact assessment.	
10	Conclusion	<p>The Applicant’s “new evidence” does not constitute a meaningful rebuttal to SEAS’s concerns. Instead, it relies on:</p> <ul style="list-style-type: none"> • inappropriate comparisons, • selective extraction of external studies, • unsubstantiated assertions, • future documents not yet assessed, • arbitrary methodological limits, • and the absence of any local empirical data. <p>The fundamental gaps identified by SEAS remain unresolved.</p> <p>The project continues to pose a material and unmitigated threat to the Suffolk Coast’s tourism economy, cultural landscape, recreational amenity and rural identity.</p> <p>For these reasons, SEAS submits that the Applicant’s responses fail to justify development consent and, on the contrary, require the Examining Authority to forensically interrogate the omissions, assumptions, and evidential weaknesses in the Applicant’s case.</p>	See response to <i>Reference 1 - Introduction / New Material</i> in this Table (Table 1.4) above.

Table 1.5 Applicant’s Comments on the SEAS Health and Wellbeing Deadline 2 Response [REP2-124]

Reference Matter	Point Raised	Applicant’s Comments
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<p>Issue 3.1</p>	<p>Mental health and community stress</p>	<p>The Applicant’s response asserts that Health & Wellbeing has been assessed holistically and that engagement has occurred, citing IEMA (2022), the WHO definition of health and three thematic Health & Wellbeing meetings.</p> <p>However, the guidance cited (IEMA 2022; HUDU; NICE NG44) requires demonstrable, engagement-informed scoping and the transparent operationalisation of mental-health determinants (indicators, methods, stakeholder inputs, and monitoring/triggers). The Applicant’s reply does not provide the required documentary evidence to substantiate these claims.</p> <p>In particular, the Applicant has not published the Health & Wellbeing scoping log or HIA methodology appendix; it has not made available minutes, attendee lists and outputs from the three thematic meetings nor the written responses from Public Health consultees showing how public-health advice informed scoping or indicator choice; it has not provided causal pathway diagrams linking predicted project effects to psychosocial endpoints; and it has not demonstrated that the cumulative assessments explicitly considered psychosocial endpoints or that REAC/CEMP measures contain monitoring triggers and enforceable responsibilities to detect and respond to psychosocial harm.</p> <p>In the absence of these documents, SEAS maintains that the ES has not demonstrably applied an engagement-based scoping approach nor</p>	<p>The Applicant considers that the matters raised reiterate <i>Issue 3.1 Mental health and community stress</i>, as previously raised in <i>Table 2.61 Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]</i>. The Applicant’s response addresses the matters raised.</p> <p>Specifically, the Applicant maintains the position that the assessment of health and wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, 2022). This follows best practice methodology used on other major infrastructure schemes, which is detailed within Section 11.4 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. The Applicant considers that the matters raised have been appropriately addressed through the assessment of health and wellbeing effects within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], including cumulative impacts, in accordance with relevant policy and guidance.</p> <p>In regard to the scoping log referenced by SEAs, a Scoping Report for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 (Application Document 6.14 Environmental Scoping Report 2022 [APP-299]),</p>
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provided transparent evidence that psychosocial outcomes were identified, measured, mitigated and will be monitored in line with best practice. We therefore request that the Examining Authority requires the Applicant to publish the documents listed below (items 1–9) as a matter of urgency and, where gaps are identified, to commit to further targeted HIA work or explicit, trigger-based monitoring and mitigation for psychosocial/mental-health outcomes (See requested evidence list in Appendix 1)

and a Scoping Opinion was received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion [APP-300]**). **Application Document 6.3.1.6.A Appendix 1.6.A Response to Scoping Opinion [APP-094]** provides responses to the comments made by the prescribed consultees at scoping stage and how each comment has been considered.

Engagement has been undertaken at multiple stages of the DCO process, consistent with the requirements of the Planning Act 2008 and in accordance with the principles set out in the (HUDU, 2019) and (IEMA, 2022) guidance. Specifically, consultation has included:

- scoping stage engagement (including Public Health England, Local Authorities, and other key stakeholders etc); and
 - non-statutory, statutory and targeted consultation.
- 3 health and wellbeing thematic meetings were held with the LPAs including SCC, ESC, KCC, Thanet District Council and Dover District Council, which covered key themes such as:
 - Assessment Guidance;
 - Acknowledging Additional Planning Guidance & Resources;
 - Employment and Income Assessment;

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- PRoW; and
 - Construction traffic impacts

One further thematic meeting held on the 10 October 2025 with SCC and ESC which reflected on Relevant Representations concerning community benefits and mental health.

Application Document 5.1 Consultation Report [APP-301] sets out the details of the targeted consultation and pre-submission engagement undertaken by the Applicant. Supporting documents are provided in Appendices C, D and F of the Consultation Report (**Application Document 5.1.4 Appendix C Non-Statutory Consultation [APP305] – Application Document 5.1.7 Appendix F Targeted Consultation [APP314]**). These appendices explain how the Applicant has considered and responded to consultation comments, including matters relating to physical and mental health and wellbeing.

In relation to REAC and CEMP measures addressing disruption and the potential for effects on mental health and wellbeing arising from construction activities on site and within the surrounding area, there are measures set out in **Application Document 9.83 Code of Construction Practice [REP3-076]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant

representations regarding core working hours, and the impact of construction traffic on mental health, for example HW01, NV01, GG05, GG37. As the REAC and CEMP are further developed, the applicant will continue to liaise with the local authorities on the management of potential effects on mental health and wellbeing.

The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363]**.

The documents cited by the Council (Appendix 1) are responded to by the Applicant later in this Table in full.

Issue 3.2 Limitations of desk-based assessment

The Applicant’s response does not address the methodological limitations identified. They conflate statutory consultation with health-focused community engagement, rely solely on secondary datasets, and fail to incorporate required psychosocial determinants in breach of HUDU (2019) and IEMA (2022) standards.

Applicant’s Response 1:
“Engagement has been undertaken at multiple stages of the DCO process... in accordance with HUDU 2019 and IEMA 2022 guidance.”

The comments regarding the limitations of a desk-based assessment have been noted and previously considered within *Table 2.61 (Issue 3.2 Limitations of Desk-Based Assessment)* (**Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This addresses the matters raised in full.

The Applicant maintains its position and does not agree that the Health and Wellbeing assessment is methodologically limited or that it fails to accord with HUDU (2019) or IEMA (2022) guidance. The assessment has been undertaken using an

SEAS' Response:

The Applicant equates statutory consultation compliance with meaningful health impact engagement, which is not what HUDU (2019) or IEMA (2022) require. Both guidance documents explicitly state:

- Local community consultation is required as a source of health evidence.
- Lived experience should inform the assessment of psychosocial determinants, including sense of place, stress, anxiety, social cohesion, identity, emotional security, and perceived safety.
- Consultation should include communities most exposed to the impacts, not only institutional stakeholders

Thus, the Applicant's gross irregularities and omissions are as following:

- I. The Applicant consulted organisations, not the affected population. The examples provided (PHE, Local Authorities, themed meetings) are professional stakeholder engagement, not community engagement. This does not meet HUDU or IEMA requirements.
- II. HUDU 2019 states that community views are essential to understanding psychosocial pathways of harm. These are precisely the determinants absent in the Applicant's assessment.
- III. IEMA (2022) emphasises that desk-based assessments alone are insufficient

evidence-led approach consistent with EIA practice and appropriate to the scale, nature and likely significance of effects identified. In addition, HUDU (2019) and IEMA (2022) advocate a proportionate approach in that the assessment of population and human health significance should draw on multiple evidence sources, including consultation responses, baseline conditions, local health priorities and regulatory standards.

In terms of engagement relating to health impacts on local communities, a series of health and wellbeing thematic meetings have been held with relevant stakeholders (including local authorities) which represent the local community. This has enabled discussion on community health and emotional wellbeing. Specifically, pre-submission engagement between 22 November 2024 and 12 January 2025 included three health and wellbeing thematic meetings, which covered key themes such as:

- Assessment Guidance;
- Acknowledging Additional Planning Guidance & Resources;
- Employment and Income Assessment;
- PRoW; and
- Construction traffic impacts

One further thematic meeting 10 October with SCC and East Suffolk Council ESC which reflected on

where the project is expected to impact emotional wellbeing or sense of place, both of which are central to this development.

- IV. There is no evidence in APP-058 that community feedback on stress, fear, place attachment, identity, or local lived experience was systematically collected, analysed, or integrated.

Relevant Representations concerning community benefits and mental health.

Collectively, this programme of engagement has helped to ensure that health considerations have been embedded early and iteratively within the development of the Proposed Project.

Applicant’s Response 2:

“Three health and wellbeing thematic meetings... enabled targeted discussion on community health, emotional wellbeing, and the potential psychosocial effects...”

SEAS’ Response:

This statement is misleading. These alleged meetings (no proofs have been provided) were allegedly attended by professional representatives (public health leads, officers, organisations) not the public, parish groups, or directly affected residents.

Thus, the Applicant’s methodological shortcomings and mischaracterisations are as following:

- I. The Applicant uses the term “community” to refer to institutions, not residents, which materially alters the meaning.
- II. Professional bodies cannot provide the lived experience evidence required by IEMA and HUDU.

The comments regarding the limitations of a desk-based assessment, have been noted and previously considered within *Issue 3.2 Limitations of Desk-Based Assessment in Table 2.61 (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014])*. This addresses the matters raised in full.

The Applicant maintains its position and does not agree that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** is methodologically flawed or that community engagement was inadequate. Thematic health and wellbeing meetings provided targeted, evidence-led discussion, complemented by wider public consultation and engagement, and baseline health data to inform the scoping and assessment of health and wellbeing effects. These meetings were attended by relevant public health and local authority representatives with responsibility for understanding population-level community health and wellbeing. Community views have been

III. No notes, minutes, or outputs demonstrate that psychosocial concerns raised by public health stakeholders were incorporated into the ES.

Moreover, while taking into account the independent survey performed by SEAS among the local communities and Open Hearings held on 5 – 12 November 2025, if such meetings had captured meaningful emotional wellbeing data, APP-058 would definitely contain:

- themes of anxiety, uncertainty, anticipatory stress
- fear of cumulative infrastructure impacts
- loss of countryside identity and sense of place
- community fatigue from repeated energy proposals

Instead, these are absent.

It is also relevant to note that during the series of Open Floor Hearings held between 5–12 November, no representatives of the Applicant were present in the room to hear directly from the affected community. This absence is material because Open Floor Hearings constitute one of the principal formal opportunities for residents to convey lived-experience impacts, including psychosocial and emotional determinants that cannot be captured through desk-based methods. The Applicant’s non-attendance further illustrates that despite their claims of robust engagement, they have not sought to hear or understand the concerns of the people living in the proposed

captured through the statutory consultation process and are reported in the **Application Document Consultation Report [APP-301]**. The Environmental Statement appropriately reports the outcomes of engagement where these have informed the assessment approach and conclusions.

HUDU (2019) and IEMA (2022) emphasise proportionality and the use of appropriate evidence to inform professional judgement. Both guidance documents advocate a proportionate approach in that the assessment of population and human health significance should draw on multiple evidence sources, including consultation responses, baseline conditions, local health priorities and regulatory standards.

The comments relating to attendance at open floor hearings held on 5-12 November 2025 are incorrect. The Applicant attended all of the Open Floor Hearings in both Suffolk and Kent and a number of representatives from the Applicant were present in the room at each of the hearings. The Examining Authority considered that it was not appropriate for the Applicant to be seated at the front of the room in the open floor hearings, but the Applicant’s representatives were present in the audience area.

The Applicant has also responded to the issues raised at the open floor hearings in the Applicant’s Written Responses to the Open Floor Hearings (see **Application Documents 9.69 Applicant’s**

development area. This directly undermines the assertion that meaningful community health and wellbeing insights have been “fully embedded” within the assessment as required under HUDU (2019) and IEMA (2022) guidance.

Written Response to Open Floor Hearing 1 [REP2-031] and Application Documents 9.71 Applicant’s Written Response to Open Floor Hearing 2 [REP2-032]).

Applicant’s Response 3:

“The structured consultation process and comprehensive assessment methodologies have ensured that insights are fully embedded... consistent with IEMA best practice.”

See response above to issue 3.2.

SEAS’ Response:

This claim is not supported anywhere in APP-058. The Health & Wellbeing chapter shows no identifiable incorporation of psychosocial determinants, which IEMA states must be:

- described explicitly
- assessed transparently
- evaluated through community-informed pathways

Thus, the Applicant’s gross irregularities are as following:

- No mapping of perceived impacts, stressors, identity threats, or community sentiment.
- No analysis of qualitative psychosocial pathways.
- No narratives or testimonies.
- No evidence of triangulation with any resident-level data.

The methodology contradicts IEMA guidance by treating psychosocial effects as implicit within generic socio-economic indicators.

Applicant’s Response 4:

See response above to issue 3.2.

“In terms of reliance on online sources... [APP-058] draws upon socio-economic and public health data, including self-reported health, long-term conditions, IMD, Community Life Survey, access to services...”

SEAS Response:

This response does not address the limitation raised. Our original point was that reliance on secondary datasets cannot substitute for local engagement or lived-experience evidence, not that such datasets are inappropriate per se.

Thus, the Applicant’s gross irregularities are as following:

- I. The Applicant lists general national datasets, none of which capture project-specific psychosocial determinants such as:
 - emotional security
 - anticipatory anxiety
 - community identity
 - cumulative emotional burden
 - landscape-based sense of place
 - perceived erosion of rural character
- II. Generic datasets cannot remotely approximate the unique emotional impact

of a major grid-reinforcement project, and this is stated in both HUDU and IEMA guidance.

- III. The Applicant’s methodology remains a desk-based literature review, not a health impact assessment informed by lived experience.

Applicant’s Response 5:

“Therefore, APP-058 has been carried out... fully cognisant of relevant health issues... consistent with IEMA guidance.”

See response above to issue 3.2.

SEAS’ Response:

This conclusion is not supported by evidence and contradicted by the very content of APP-058.

Thus, the Applicant’s gross irregularities are as following:

- Psychosocial determinants are not assessed, described, or measured.
- No pathways of emotional wellbeing or mental health impacts are modelled.
- No community-generated data is presented.
- No differential impacts on vulnerable or highly affected groups are identified.

Issue 3.3 Rebuttal:
Misclassification
of duration and
significance

Applicant’s Response 6:

“there are no standard definitions” of short-, medium- and long-term

SEAS’ Response:

The comments regarding the misclassification of duration and significance, have been noted and previously considered within *Issue 3.3 Misclassification of duration and significance in Table 2.61 (Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant*

While IEMA (2022) intentionally allows flexibility, the Applicant’s response omits a key requirement: the duration categories must be defined transparently and project-specifically, as stated in IEMA Table 7.2 and accompanying text (“long-, medium-, short- and very short-term should be defined for a given project”). APP-058 does not define short-, medium- or long-term anywhere in the Health and Wellbeing chapter, nor in its methodological appendix. Instead, the Applicant applies the labels “short-term” and “temporary” without disclosing any rationale or duration thresholds. This omission means the classification of a multi-year construction programme as “short-term” is unsupported, non-transparent, and contrary to IEMA’s explicit instruction

Representations identified by the ExA [REP2-014]). The Applicant therefore considers that the conclusions reported in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** remain robust, proportionate, and compliant, and no additional assessment is necessary. This addresses the matters raised in full and no further response is required.

Applicant’s Response 7:

“applicant’s term of construction stated: approximately 5 years”

See response above to issue 3.3.

SEAS’ Response:

The construction programme for the Suffolk onshore works is approximately five years, as stated by the Applicant in the project description. A period of this length is not self-evidently “short-term”, particularly in the context of:

- psychosocial impacts,
- chronic stress,
- prolonged amenity loss, and
- disruption affecting daily life over multiple consecutive years.

Importantly, because the Applicant failed to define their duration categories (as required by IEMA (2022), which states that terms such as “short-”, “medium-”, and “long-term” must be specifically defined for each project) their duration judgements lack transparency and methodological grounding. As a result, there is no evidence or rationale explaining why a multi-year period equalling or exceeding a primary school cycle can be considered “short-term” in the context of psychosocial impacts.

Therefore, the classification is methodologically unsubstantiated and does not comply with the approach set out in IEMA (2022).

Applicant’s Response 8:

See response above to issue 3.3.

Applicant’s claim “*duration is only one component of magnitude*”

SEAS’ Response:

This is correct in principle but irrelevant to the core concern. Significance is determined by magnitude × sensitivity, and duration is explicitly one of the main magnitude criteria in IEMA (2022 Table 7.2). By incorrectly categorising a 5-year programme as “short-term,” the Applicant systematically downweights magnitude, which inherently downweights significance. This undermines the reliability of the significance conclusions in APP-058.

Moreover, for psychosocial determinants, including stress, loss of amenity, uncertainty, and diminished quality of life - just to mention a few - duration is not a minor variable but a primary driver of cumulative health harm.

Applicant’s Response 8:

See response above to issue 3.3.

On the Applicant’s assertion that *“even if the duration were characterised as short-to-medium term, or conservatively reclassified as medium-term, this would not alter the assessment conclusions”*.

SEAS’ Response:

This is an assertion without evidential support. Under IEMA (2022), duration is explicitly one of the core magnitude criteria (Table 7.2), and magnitude feeds directly into significance. If duration were correctly reclassified as medium-term:

- I. magnitude scores would increase for multiple determinants (noise annoyance, amenity loss, access disruption, community identity), and SEAS Health and Wellbeing Rebuttal – Deadline 2 11
- II. several effects currently assessed as “not significant” would move into “potentially significant” or “significant” categories under IEMA’s own matrix.

The Applicant provides no worked example, no matrix sensitivity test, and no methodological justification to support their claim that reclassification would make no difference.

Without presenting (a) a recalculated magnitude, (b) any alternative duration category, or (c) a demonstration that the significance score is unchanged, the Applicant's statement remains unsupported and cannot be relied upon

Applicant's Response 9:

See response above to issue 3.3.

On the Applicant's claim that APP-058 adopts a "proportionate, receptor-focused" approach

SEAS' Response:

This claim is contradicted by the assessment itself. A receptor-focused approach requires:

- explicit duration definitions,
- justification for applying them to affected population groups, and
- consideration of chronic or cumulative psychosocial exposure over multi-year periods.

APP-058 provides none of these elements:

- I. There are no reasoning and any receptor-specific justification for why a 5-year period treated as "short-term"
- II. No assessment is provided for households experiencing sequential impacts from overlapping NSIP projects, where medium-term duration should be escalated to medium-high magnitude due to chronic exposure.

- III. No explanation is given for how a multi-year programme is “temporary” from the perspective of vulnerable groups (children, older adults, persons with existing and pre-existing mental health vulnerabilities)

Therefore, the assertion of a “receptor-focused” approach is not supported by the content of the assessment.

Thus, the Applicant’s demonstrated irregularities regarding issue 3.3 are as following:

- I. Failure to define duration categories as required by IEMA (2022).
- II. Unsupported classification of a multi-year (5-year) period as “short-term.”
- III. Unsupported assertion that reclassification would not change significance conclusions.
- IV. Lack of receptor-focused analysis, despite the Applicant’s claims.
- V. Non-transparency, which contradicts the both IEMA guidance and the Examining Authority’s expectations for robust EIA methodology.

Issue 3.4	Rebuttal: Flawed Baseline on Community Cohesion	The Applicant’s response does not address the core issue raised. The problem is not that the ES used 2021/22 Community Life Survey data, but that it misrepresented that data by characterising the East of England as having “comparatively low” community cohesion. Even the 2021/22 dataset cited in para 11.9.54 does not justify this	The comments regarding the flawed baseline on community cohesion, have been noted and previously considered within <i>Issue 3.4 Flawed Baseline on Community Cohesion in Table 2.61 (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant</i>
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conclusion. Therefore, the baseline was not simply outdated, it was inaccurately interpreted.

The Applicant’s claim that this constitutes a “conservative” or “worst-case” baseline is methodologically inappropriate within a psychosocial and mental wellbeing context. Overstating baseline vulnerability artificially reduces the assessed incremental impact of the project. A community with stronger cohesion is MORE sensitive, not less, and has more to lose from disruption, uncertainty, and loss of place identity.

Furthermore, the Applicant’s assertion that the 2023/24 survey data would “reinforce” the ES conclusions is logically flawed: in psychosocial assessment, newer data showing higher community cohesion indicates HIGHER community sensitivity, because strong, trusting, well-connected communities experience greater psychological disruption when confronted with large, imposed infrastructure projects. This is a standard principle in mental-health impact assessment: stronger cohesion means there is MORE at stake in terms of identity, stability, predictability, emotional security, and sense of place. Therefore, higher cohesion INCREASES – not decreases! – the potential for psychosocial harm.

This inversion of risk demonstrates a fundamental misunderstanding of psychological and public-mental-health principles. It strongly suggests that the Health and Wellbeing chapter was produced WITHOUT adequate input from qualified

Representations identified by the ExA [REP2-014]). This addresses the matters raised in full.

The Applicant does not accept that the baseline on community cohesion has been mischaracterised or that the assessment is flawed. The Community Life Survey data was used to provide a regional benchmark and to inform the assessment of community vulnerability and sensitivity. Higher levels of community cohesion do not automatically equate to greater sensitivity to change. While strong cohesion can heighten awareness of disruption, it can also increase ability to adapt and improve and resilience. Conversely, lower or uneven levels of cohesion may indicate weaker community networks, trust and social support, which can increase vulnerability to change. As per **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, characterising baseline community cohesion conservatively is consistent with EIA practice, as it avoids underestimating sensitivity where community networks, trust and social support may be weaker or more unevenly distributed.

psychologists or mental-health specialists. The error is not a minor interpretative slip; it indicates a gap in expertise relevant to psychosocial assessment in the Applicant's assessment team. As a result, the conclusions presented cannot be regarded as robust, reliable, or aligned with accepted psychosocial impact methodology. Thus, paragraphs 11.9.54 and 11.9.59 depend on a mischaracterised baseline, and their conclusions are invalid and must be reconsidered.

Issue 3.5 Rebuttal:
Cumulative impact
ignored

The Environmental Statement (APP-060) fails to assess cumulative psychosocial burden arising from the unprecedented concentration of simultaneous NSIPs affecting the same rural population: Sizewell C, EA1N, EA2, LionLink, and now Sea Link.

The Applicant claims this cumulative burden was assessed. However, their response demonstrates that the assessment was conducted using non-psychosocial methods, applying physical-environmental topic chapters as proxies for mental-health outcomes. This approach directly contradicts recognised public-health methodologies (NICE NG44, HUDU, IEMA 2022), which require evaluation of cumulative psychosocial stressors in their own right.

The comments regarding the cumulative impact being ignored, have been noted and previously considered within *Issue 3.5 Cumulative Impact Ignored in Table 2.61 (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014])*. This addresses the matters raised in full.

As explained, the assessment of cumulative health and wellbeing effects in **Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** follows established EIA practice, whereby physical and mental health and wellbeing outcomes are considered through relevant determinants and pathways informed by the conclusions of topic chapters such as noise, transport, landscape and visual, and socio-economics, recreation and tourism. This approach is consistent with IEMA (2022) and HUDU (2019) guidance.

Ultimately, while the health and wellbeing assessment draws on the findings of other technical topic assessments, these do not in themselves determine health significance. Assessment findings and conclusions are used to identify potential exposure pathways for cumulative health determinants, as defined in the source-pathway receptor links set out in Table 11.7 of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. This is then assessed using sensitivity and magnitude criteria developed specifically for health and wellbeing assessment (set out in Table 11.8 and 11.9 of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**).

This ensures that the significance of cumulative effects is determined through a health-led assessment framework, rather than inferred directly from other topic conclusions.

The Applicant therefore maintains that the cumulative assessment is proportionate, compliant and robust, and that the conclusions reported in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** remain valid. No further assessment or information is proposed.

Applicant's Response 9:

"APP-060 assesses cumulative schemes based on the geographic extent of other topics... including landscape and visual, traffic and transport, air

See response above to issue 3.5.

The IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and IEMA Guide to

quality, noise, vibration, socio-economics, recreation, and tourism.”

SEAS’ Response:

This confirms the central flaw: the Applicant uses topic-based environmental pathways (noise, air, traffic, etc.) as SUBSTITUTES for psychosocial impacts. However, cumulative mental-health effects cannot be inferred from individual physical parameters.

Psychosocial burden arises from the combined weight of multiple uncertainties, disruptions, losses of control, repeated consultations, prolonged anticipation stress, and the perceived erosion of place and stability over time. These determinants are not captured by environmental pathways and CANNOT be modelled via additive noise/traffic metrics.

This is directly contrary to:

- IEMA (2022): which defines psychosocial effects as a separate determinant requiring direct assessment.
- HUDU (2019): which requires cumulative stressors to be evaluated in terms of wellbeing, not emissions.
- NICE NG44: which states that cumulative burden must be understood through community engagement and analysis of psychological stressors.

Determining Significance For Human Health In Environmental Impact Assessment (IEMA, 2022) does not define psychosocial effects as a separate or standalone determinant requiring direct assessment in isolation. Rather, the guidance adopts wider determinants of health approach, and considers health in a holistic way. As such, the assessment within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). The Applicant’s approach drawing on the findings of other technical assessments to inform health determinants and then applying sensitivity and magnitude criteria developed specifically for health, accordingly aligns with established EIA practice and IEMA (2022).

In relation to HUDU (2019) and NICE NG44 (2016), the Applicant has undertaken a cumulative assessment of health and wellbeing effects within **Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This follows established EIA practice, and considers cumulative effects in terms of wellbeing, rather than emissions alone, whereby physical and mental health and wellbeing outcomes are considered through relevant determinants and pathways

By relying solely on physical-topic chapters, the Applicant's approach is NOT compliant with best practice guidance, even though they claim otherwise.

informed by the conclusions of topic chapters such as noise, transport, landscape and visual, and socio-economics, recreation and tourism. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. Community engagement undertaken as part of the EIA process (see response to Issue 3.2 above), has informed the identification of relevant receptors, sensitivities and wellbeing pathways, consistent with the principles set out in NICE NG44.

Applicant's Response 10:

"Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes."

See response above to issue 3.5.

SEAS' Response:

The Applicant's response gives the appearance of cumulative assessment but is not a psychological or wellbeing assessment, which requires:

- identifying interacting stressors,
- mapping overlapping temporal burdens,

-
- analysing community exhaustion,
 - considering chronic anticipatory anxiety,
 - and applying a multi-project exposure lens.

Simply stacking physical-topic data DOES NOT constitute a cumulative psychosocial assessment.

The Applicant evaluated projects side-by-side, not the community's combined lived exposure, which is the entire point of a cumulative wellbeing analysis.

Applicant's Response 11:

See response above to issue 3.5.

"The health and wellbeing CEA anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance... etc."

SEAS' Response:

The Applicant's response reveals a second methodological error: the Applicant equates "no significant noise/visual/traffic impacts" with "no mental-health impacts", which is methodological misapplication of environmental proxies to psychosocial outcomes.

Mental-health effects from NSIPs emerge not only from environmental pathways but from:

- protracted uncertainty and prolonged decision timelines,
- repeated industrialisation of a rural coastline,
- loss of trust in institutions,

-
- disruption of place-identity,
 - cumulative consultation fatigue, and
 - fear of future schemes (a significant determinant in NICE, HUDU, and IEMA).

These determinants are NOT measured anywhere in APP-060.

Therefore, the Applicant's assertion that "no significant environmental effects = no psychosocial effects" is methodologically unsupported and psychologically erroneous.

Applicant's Response 12:

"The overall inter-project assessment... is not significant."

See response above to issue 3.5.

SEAS' Response:

This conclusion has been derived from a methodology that excludes the VERY determinants it claims to assess.

Additionally, the statement that this conclusion is "precautionary" is incorrect: a precautionary approach requires erring on the side of identifying risk, not systematically excluding psychosocial pathways.

The Applicant has NOT demonstrated precaution, they have demonstrated OMISSION.

The repeated use of physical-environmental proxies as stand-ins for psychosocial determinants

strongly suggests that the assessment team lacked clinical or psychosocial expertise.

The result is an Environmental Impact Assessment chapter that:

- treats mental-health outcomes as secondary to emissions;
- excludes core psychosocial mechanisms recognised by NICE, HUDU, IEMA;
- misrepresents community vulnerability;
- cannot credibly claim to have assessed cumulative mental-health burden.

This is not a matter of professional disagreement; it is a methodological non-compliance arising from a LACK of appropriate expertise.

Therefore, the Applicant’s “cumulative assessment” does not meet the requirements of IEMA (2022), HUDU (2019) or NICE NG44 for evaluating psychosocial determinants of health, and therefore its conclusion of “no significant cumulative impact” is methodologically unsupported, psychologically unsound, and CANNOT be relied upon by the Examining Authority.

Issue 3.6 Rebuttal:
Vulnerable
populations
overlooked

The Equality Impact Assessment (APP-362) recognises potential disproportionate risks to elderly, disabled and neurodivergent residents. However, the Human Health chapter (APP-058) does not identify or assess localised impacts in the specific communities of Friston, Aldeburgh or Saxmundham, the most affected by the projects.

The comments regarding vulnerable populations have been noted and previously considered within *Issue 3.6 Vulnerable Populations Overlooked in Table 2.61 (Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014])* This addresses the matters raised in full.

The Applicant argues that the Human Health Study Area (defined at ward and district level). is appropriate and consistent with IEMA (2022) guidance, and that village-level impacts are implicitly encompassed because these geographies sit within the wider assessment boundary. They state that the methodology ensures an objective, proportionate evaluation and that vulnerable groups are considered through sensitivity classifications.

While the methodology may follow general guidance, it does not replace the need for meaningful, localised assessment of communities that may contain concentrated vulnerable populations. Simply stating that these villages fall within a broader Study Area DOES NOT demonstrate that their distinct demographic profiles, accessibility constraints, or specific exposure pathways have been examined.

Ward-level datasets can obscure significant intra-ward variation, particularly in small rural settlements. As a result, the Applicant provides no evidence that the elderly, disabled or neurodivergent residents of Friston, Aldeburgh or Saxmundham have been assessed for site-specific or disproportionate health and wellbeing impacts.

Therefore, the concern that vulnerable populations have been overlooked remains UNRESOLVED.

The Applicant maintains the Health and Wellbeing assessment in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been undertaken in accordance with IEMA (2022) guidance, which supports the use of proportionate study areas defined at ward and district level. Vulnerable groups, including elderly, disabled and neurodivergent populations, are explicitly considered through receptor sensitivity and exposure pathways informed by baseline data. While ward and district level datasets are used to characterise baseline conditions, this does not preclude consideration of impacts on smaller communities, as explained in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. The Applicant therefore maintains that vulnerable populations have been appropriately and proportionately considered, and that no further localised health assessment is required.

Issue 3.7	Rebuttal: Failure to assess	APP-058 fails to comply with the requirements of NPS EN-1 paragraph 4.4.4 and EIA Regulations	The Applicant does not accept that the Health and Wellbeing chapter fails to comply with NPS EN-1
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alternatives or avoidance

14(2)(d), both of which require the assessment of avoidance strategies and a clear, evidence-based consideration of main project alternatives. Despite its relevance to reducing onshore health and wellbeing impacts, SEAS's proposed offshore HVDC grid alternative was NEITHER assessed NOR referenced in the Human Health chapter.

The Applicant responds that alternatives have allegedly been comprehensively addressed in Application Document APP-044 and that the design evolution process has incorporated avoidance wherever practicable.

However, the response does not address the specific concern that APP-058 itself FAILS to analyse how alternative configurations (particularly offshore transmission solutions!) could avoid or substantially reduce health and wellbeing impacts on affected communities.

Referring to APP-044 does not demonstrate compliance with NPS EN-1 or EIA Regulation 14(2)(d) unless:

- the alternative is actually assessed,
- its avoidance potential is evaluated,
- the implications for human health are transparently compared

SEAS's offshore HVDC grid proposal remains unassessed, and NO reasoning is provided for its

paragraph 4.4.4 or EIA Regulation 14(2)(d). The consideration of reasonable alternatives, including design evolution and avoidance measures is addressed comprehensively in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**, with the Applicant's position explained in response to *Issue 3.7 Failure to Assess Alternatives or Avoidance in Table 2.61 Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]*. It is noted that health and wellbeing considerations have also been factored into the assessment of strategic options and alternatives.

The Health and Wellbeing assessment in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** reflect the scheme that has emerged from that process and assesses health and wellbeing effects on that basis, including embedded mitigation and avoidance measures incorporated through design evolution. The Applicant therefore considers that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** is compliant, and that no further assessment or comparison of alternatives is required.

		<p>exclusion. As a result, APP-058 does NOT meet the legal requirement to present a robust, transparent assessment of reasonable alternatives or avoidance strategies.</p>	
Issue 3.8	<p>Rebuttal: – Lack of Mental Health Indicators or Monitoring</p>	<p>The Applicant’s response confirms the core issue: NO mental-health-specific indicators were used.</p> <p>Moreover, their position that generic socio-economic determinants can “implicitly” account for psychological outcomes reflects a fundamental misunderstanding of established psychological principles. Determinants such as deprivation indices, greenspace access, or employment patterns do NOT measure stress, anxiety, fear responses, loss of control, chronic strain, or psychological resilience, which are distinct constructs with well-defined pathways and validated measurement tools in mental health science (Appendix 2 gives explanation, why determinants cannot substitute for mental health outcomes).</p> <p>The failure to distinguish between determinants and outcomes is a basic conceptual ERROR that would not occur in an assessment designed or reviewed by qualified mental health professionals. The assessment appears to have been undertaken without input from qualified mental-health professionals, such as psychologist, behavioural scientist, or mental-health specialist, and as a result the authors have conflated broad socio-economic conditions with actual psychosocial wellbeing,</p>	<p>The comments have been noted and previously considered within <i>Issue 3.8 Lack of Mental Health Indicators or Monitoring in Table 2.61 (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014])</i>. This addresses the matters raised in full.</p> <p>Further, the Applicant does not accept that the Health and Wellbeing assessment is deficient. The assessment in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been undertaken in accordance with IEMA (2022) guidance, which supports a proportionate, population-level approach to health assessment within EIA. Recognised determinants of health and wellbeing are used as accepted proxies, reflecting the limits of what can be robustly evidenced within EIA. There is no requirement under IEMA guidance, the EIA Regulations or NPS EN-1 for a Human Health chapter to be prepared or reviewed by clinical mental-health specialists. The Applicant therefore can confirm that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been prepared by suitably qualified and competent specialists, applies an appropriate and proportionate methodology, and provides a robust basis for its conclusions.</p>

which is another methodological mistake that undermines the credibility of their conclusions.

This demonstrates a significant competence gap in the preparation of APP-058. Psychological impacts CANNOT be reliably assessed without appropriate indicators or professional understanding of how mental health is affected by prolonged uncertainty, disruption, and the cumulative burden of multiple NSIPs. Consequently, APP-058’s conclusions regarding mental health lack evidential basis, do NOT align with contemporary psychological science, and fail to meet the expectations of robust human-health assessment under IEMA guidance.

Specifically, Section 1.10 of **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction [APP-042]** sets out that this ES has been prepared and coordinated by environmental consultants who are competent members of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark Scheme (Institute of Environmental Management and Assessment, 2024). A Statement of Competence (SoC) (**Application Document 6.3.1.1.A Appendix 1.1.A Statement of Competence [APP-088]**) is included within the ES, outlining the relevant expertise or qualifications of the experts who have prepared the ES for the Proposed Project.

Issue 3.9 Rebuttal: No lived experience included

Overall, the Applicant’s claim that the survey “was circulated via social media groups for SEAS members” is factually incorrect, and is not a research finding but an unfounded allegation. The survey was distributed through multiple channels, including social media more broadly, community email lists, and local contacts – not exclusively within SEAS groups. Misrepresenting the survey in this way constitutes manipulation of evidence and an attempt to diminish the legitimacy of the ONLY substantive community-sourced data available. That volunteers, working solely on a not-for-profit basis, were able to conduct such a comprehensive and informative survey, underscores the inappropriateness and unfairness of the Applicant’s attempt to downplay it.

The Applicant notes the points raised in relation to Issue 3.9 regarding lived-experience evidence and the SEAS survey. These matters have been addressed in full through the Applicant’s responses in *Table 2.61* of **Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations [REP2-014]**.

As set out previously, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been prepared in accordance with IEMA (2022) guidance, applying recognised health determinants, baseline evidence, exposure pathways, receptor sensitivity, and professional judgement to provide a proportionate and robust assessment of likely significant effects. While qualitative, volunteer-led submissions can provide contextual insight into individual

experiences, they are not a required input for assessment, and their absence or inclusion does not undermine the methodology or conclusions of the health and wellbeing assessment. Accordingly, the Applicant maintains that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** represents a comprehensive, proportionate, and methodologically sound assessment of health and wellbeing, and that the matters raised do not demonstrate any deficiency or require further assessment.

Mischaracterisation of the Survey and Misunderstanding of Psychosocial Evidence:

The Applicant’s response treats lived-experience evidence as though it must meet the standards of a probabilistic epidemiological dataset. This is a fundamental misunderstanding of psychosocial methodology and of IEMA (2022), which explicitly recognises the need for qualitative evidence, importance of community perceptions, and role of psychosocial pathways including uncertainty, loss of control, and perceived threat.

None of these require a randomised or statistically powered survey, but listening to affected people – something APP-058 did not do.

The assertion that qualitative, self-reported psychosocial harm is “subjective” and therefore dismissible AGAIN shows a lack of mental-health expertise. All psychological outcomes (stress, anxiety, fear, anticipatory grief, loss of place-

See response above to issue 3.9.

identity) are by definition subjective experiences. Their subjectivity does not invalidate them; it is the entire basis on which psychosocial impacts are assessed.

Representativeness Is NOT the Standard Required:

See response above to issue 3.9.

The Applicant repeatedly argues that the SEAS survey is “not representative”, which is irrelevant and misdirected. For qualitative psychosocial evidence, representativeness is not required, and IEMA does NOT require community data to be statistically representative to inform an EIA.

Instead, requirements are:

- collection of lived-experience data,
- proper engagement with affected communities,
- transparent integration of community concerns into assessment.

By rejecting community evidence because it is not a population-level probability sample, the Applicant applies a standard that does not exist in EIA nor in mental-health research, thereby excluding precisely the type of evidence MOST relevant to psychosocial harm.

The Attacks on Survey Framing Are Factually and Methodologically WEAK:

See response above to issue 3.9.

The Applicant argues the survey questions are “leading” because they ask about concerns or worries, which is incorrect.

In psychosocial research:

- Asking “what concerns you?” is a standard, neutral elicitation method.
- It does not introduce negative bias; it simply focuses on the domain of interest – wellbeing impacts.
- This is entirely appropriate when investigating risk, fear, stress, or perceived harm.

Moreover, the claim that providing context about multiple energy projects “biases” respondents fails to acknowledge that this context is objectively true and forms the material conditions under which cumulative psychosocial harm arises.

It is not “biasing” to describe reality.

Misstatement: SEAS Survey Population is 0.8% of Study Area: See response above to issue 3.9.

The Applicant calculates 131 respondents as 0.8% of a combined ward population. Even if true, the figure is irrelevant: psychosocial qualitative evidence does not rely on large proportions.

However, it should be noted that the relevant population for onshore impacts is NOT the entire ward population (including offshore oil workers,

seasonal residents, dispersed hamlets, etc.), but the affected local communities, making the Applicant's denominator inappropriate. This artificially dilutes the significance of the findings

Community Concerns Are Evidence of Impact – Not Just “Perceptions”: See response above to issue 3.9.

The Applicant frames the survey responses as “perceptions”, which again reveals a lack of psychological understanding:

- In mental health, perception of threat produces actual harm, regardless of whether the threat is realised.
- Anticipatory anxiety, uncertainty, loss of control, and erosion of place-identity are mechanisms of impact, not optional add-ons.

Dismissing perception-based evidence is equivalent to dismissing the CORE of psychosocial impact assessment

Lack of Lived-Experience Data Contradicts IEMA Requirements: See response above to issue 3.9.

The Applicant asserts that APP-058 “integrates” community concerns via general consultation. However:

- No structured psychological data was collected.
- No mental-health indicators were used.
- No community narratives were analysed qualitatively. • No engagement occurred in the villages most affected (documented by SEAS).

-
- No trained mental-health practitioner was included in the assessment team.

The result is an assessment without any lived-experience foundation, contrary to:

- IEMA (2022)
- Public Health England (2019)
- HUDU (2019)
- standard psychosocial risk-assessment practice.

The “Non-Representative” Argument Is Self-Defeating:

See response above to issue 3.9.

The Applicant argues the survey is not representative of the wider population, but this very argument actually highlights the Applicant’s failure:

- If the Applicant wanted representative data, they could have collected it.
- If they wanted structured psychosocial evidence, they could have commissioned it.
- However, they did neither.

Instead, they are attempting to discredit the ONLY available evidence because they chose not to gather any of their own

Claiming That Survey Evidence “Cannot Alter Conclusions” Is Pre-Determination:

See response above to issue 3.9.

The statement that the lived-experience evidence “cannot be considered sufficient to alter

conclusions” indicates a predetermined stance, not an evidence-led process.

If community evidence – however inconvenient it is – is dismissed categorically, the assessment becomes unfalsifiable and therefore NOT methodologically sound

Provision of a Telephone Helpline Is NOT Impact Assessment:

See response above to issue 3.9.

Highlighting a future helpline and communications team has no bearing on whether the ES adequately assessed psychosocial harm. This is mitigation by public relations, not health assessment

Conclusion: Fundamental Methodological Gap

See response above to issue 3.9.

The Applicant’s dismissal of lived-experience evidence arises from a misapplication of sampling logic and a misunderstanding of mental-health science.

Because APP-058 did not include:

- mental-health indicators,
 - psychological expertise,
 - qualitative analysis,
 - or meaningful engagement with those experiencing harm, the conclusion that “no significant effects are anticipated” is methodologically unsound and psychologically uninformed.
-

The SEAS survey therefore does not merely “offer insight” — it provides the only actual evidence of lived psychosocial harm available, which the Applicant failed to gather, and is now improperly disregarding.

Issue
3.9.2

Rebuttal: A summary of key inconsistencies between the Sea Link Environmental Statement and available evidence is presented in Table 3 (added in the Appendix 4)

The Applicant asserts that the issues summarised in Table 3 of the Relevant Representation have been “addressed in detail” and that the ES methodology adheres to IEMA best practice. This statement misrepresents the situation for the following reasons:

Methodology Gaps:

- I. As demonstrated in responses to sections 3.1–3.9, APP-058 lacks mental health expertise, fails to incorporate direct psychosocial indicators, and conflates social determinants with mental-health outcomes.
- II. The Applicant’s methodology is therefore incomplete and does not meet IEMA’s requirement to consider qualitative evidence, community perceptions, and psychosocial pathways, including uncertainty, loss of control, and perceived threat.

Data Sources and Baseline Evidence:

- I. APP-058 uses outdated and misinterpreted baseline data (e.g., 2021 Community Life Survey) while ignoring

The Applicant does not accept the characterisation of the ES as inconsistent, incomplete or non-compliant with IEMA guidance. The matters summarised in Table 3 of the Relevant Representation have been addressed through the Applicant’s detailed responses to Issues 3.1–3.9, including those set out in Table 2.61 of **Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations [REP2-014]**, and no new evidence or arguments are introduced that alter the conclusions reached.

newer evidence that shows higher community cohesion and pre-existing psychosocial stress in the affected population.

- II. Reliance solely on desk-based determinants without lived-experience evidence results in an unsubstantiated assessment.

Consultation and Engagement:

- I. The Applicant’s claims of extensive consultation do not address the absence of meaningful engagement with the most directly affected communities, such as Friston, Aldeburgh, and Saxmundham.
- II. The dismissal of the SEAS survey as “non-representative” is methodologically flawed, misapplies statistical logic, and mischaracterises the evidence channels through which the survey was distributed.
- III. Apparent mischaracterisation of the SEAS survey as “circulated via social media groups for SEAS members” discredits the Applicant’s procedural and ethical stance in the EIA process per se.

Misrepresentation of Best Practice Compliance:

- I. While the Applicant references IEMA (2022) guidance, their interpretation systematically excludes standard psychosocial methods recommended for infrastructure projects.

-
- II. Claims of “robust” assessment are therefore not substantiated, as the ES ignores cumulative stress from overlapping NSIPs, lacks mental-health metrics, and disregards direct community input.

Overall Assessment of Inconsistencies:

- I. Table 3 of the Relevant Representation summarises the fundamental discrepancies between APP-058 and the actual psychosocial context of the affected communities.
- II. The Applicant’s generic statement that “the issues are addressed” does not engage with the evidence of methodological gaps, misclassification of impact duration, neglect of vulnerable populations, or failure to consider alternatives or lived experience.
- III. As such, the ES CANNOT be considered comprehensive or robust in relation to mental health and psychosocial impacts.

Therefore, the Applicant’s response in relation to Table 3 reflects dismissal rather than substantive engagement. It does not rectify or justify the methodological deficiencies, misrepresentations, and omissions identified throughout sections 3.1–3.9. The ES therefore remains incomplete, methodologically unsubstantiated, and not compliant with IEMA guidance regarding psychosocial health assessment.

Issues 4.1-4.4	Rebuttal: Concerning the Cumulative Emotional and Mental Health Consequences of the Sea Link Project and Related Large Scale Energy Infrastructure in East Suffolk	The Applicant acknowledges the Psychological Impact Statement and the 2025 survey of 131 residents but dismisses both as “limited, self-selected, and non-representative,” claiming that the responses are subjective and leading. This response is methodologically flawed, misleading, and inconsistent for the following reasons:	The Applicant considers that the matters raised in Issues 4.1–4.4 reiterate concerns already addressed within Table 2.61 of Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations [REP2-014] . This addresses the matters raised in full.
		Survey as legitimate lived-experience evidence:	
		<ul style="list-style-type: none"> I. The survey provides direct, contemporary evidence of real psychosocial harm, including chronic stress, decreased resilience, helplessness, and even suicidal ideation. These are precisely the outcomes that the Applicant’s ES methodology (APP-058) is intended to capture under IEMA (2022) guidance. II. Dismissing lived-experience evidence on the basis of self-selection contradicts IEMA (2022), which explicitly recognises the need for qualitative evidence, the importance of community perceptions, and the role of psychosocial pathways such as uncertainty, loss of control, and perceived threat. 	Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been prepared in accordance with IEMA (2022) guidance, applying a proportionate methodology that draws on established socio-economic and public health datasets, professional judgement, and topic-specific assessments. The Applicant does not accept that the dismissal of the SEAS survey represents misrepresentation or minimisation of evidence, nor that it indicates a deficiency in expertise or methodology. Accordingly, the Applicant considers that the points raised reiterate matters already addressed during the Examination and do not demonstrate that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] is incomplete, non-robust or inconsistent with best practice.
		Expert testimony substantiates cumulative impact:	
		<ul style="list-style-type: none"> I. The 2021 expert statement by Dr. Jane McNeill, a clinical psychologist and Associate Fellow of the British Psychological Society, predicted psychosocial harm arising from long-term uncertainty, environmental degradation, 	

and institutional disregard. The 2025 survey demonstrates that these predicted harms have materialised, providing an evidence-based link between NSIP activity and cumulative mental-health impacts.

- II. Ignoring this testimony and the survey undermines the credibility of the Applicant’s “no significant effect” conclusion.

Misunderstanding of cumulative psychosocial pathways:

- I. The Applicant’s reliance on APP-060 for cumulative assessment focuses on environmental and socio-economic parameters (landscape, noise, transport, air quality), but fails to capture cumulative mental-health burdens, psychosocial stress, or the compounding impact of multiple NSIPs on vulnerable populations.
- II. Their assessment methodology misinterprets the psychological principles of cumulative stress and perceived threat, which are non-linear and can intensify with overlapping projects.

Dismissal of survey evidence is manipulative:

- I. The claim that the survey was “self-selected” is misleading; distribution occurred via multiple channels and represents a substantive portion of the
-

directly affected population. Downplaying this denigrates a volunteer-led, professionally-informed community effort to document mental-health impacts.

- II. Such mischaracterisation constitutes inappropriate dismissal of available evidence, and highlights the absence of mental-health expertise in the Applicant’s team.

Therefore, the Applicant’s dismissal of both expert psychological opinion and lived-experience survey evidence demonstrates a pattern of methodological inadequacies to capture cumulative mental-health and psychosocial effects, contrary to IEMA (2022) guidance and best practice in human-health EIA.

The evidence presented by SEAS is methodologically valid, directly relevant, and compelling, revealing that cumulative harms are occurring and are likely to intensify with each additional NSIP.

Consequently, APP-058 CANNOT be considered robust or comprehensive in relation to cumulative psychosocial impacts.

Issues 4.5, Rebuttal:
4.5.1 Summary of key data via thematic clusters and Headline Results.

The Applicant acknowledges the headline results but dismisses them as “limited, self-selected, and non-representative,” claiming that questions were leading and that the survey cannot be used to assess prevalence or magnitude. This response is factually and methodologically flawed:

See response above to issues 4.1-4.4.

Survey legitimacy and representation:

- I. The survey reached 131 residents across Saxmundham, Aldeburgh, and Friston, representing a substantive proportion of the directly affected population.
- II. Distribution occurred via multiple channels, including social media broadly, community contacts, and local networks, not exclusively through SEAS groups. The Applicant's claim to the contrary is unfounded, misrepresentative, and unethical.

Lived experience is valid evidence under IEMA (2022):

- I. IEMA guidance explicitly recognises the importance of qualitative evidence, community perceptions, and psychosocial pathways (including uncertainty, loss of control, and perceived threat) in assessing human health impacts.
- II. Dismissing lived-experience data in this context ignores established best practice, particularly for infrastructure projects with long-term psychosocial consequences.

Substantive mental-health impact documented:

- I. The SEAS survey demonstrates high levels of anxiety, frustration, sadness, depression, insomnia, and perceived

-
- helplessness directly linked to Sea Link and cumulative NSIPs.
 - II. 69% of respondents report significant negative effects on mental wellbeing, which is consistent with predictions from expert psychological testimony (Dr. Jane McNeill, 2021).
 - III. These findings provide concrete evidence of psychosocial harm that APP 058 fails to adequately capture or mitigate.

Misinterpretation of qualitative and self-reported data, and dismissal of evidence:

- I. The Applicant incorrectly frames the survey as “anecdotal” and claims it cannot establish prevalence. While qualitative in nature, the survey quantifies trends across multiple psychological and emotional dimensions, producing meaningful insights into community-wide psychosocial impacts.
- II. The dismissal of volunteer-led data demonstrates a lack of understanding of psychological principles and qualitative methodology, revealing a gap in the Applicant’s assessment expertise.

Thus, as proved above, the SEAS survey results are methodologically valid, relevant, and directly pertinent to assessing cumulative psychosocial harm in the affected communities. Taken together, expert testimony, survey data, and cumulative impact analysis reveal substantial, ongoing mental-

health and psychosocial harms that APP-058 fails to adequately assess, mitigate, or monitor.

And the Applicant’s dismissal represents misrepresentation and minimisation of lived-experience evidence, undermining the credibility of APP-058. The Environmental Statement is therefore not robust, not comprehensive, and inconsistent with IEMA (2022) guidance regarding qualitative, psychosocial, and cumulative human-health impacts

<p>Issues 4.5.2 to 4.10.1</p>	<p>Rebuttals to:</p> <ul style="list-style-type: none"> • Issues 4.5.2 – Thematic Analysis and Community Voices • Issues 4.5.2.1-4.5.2.2 – Emotional Exhaustion and Chronic Stress • Issues 4.6-4.6.2 – Mental Health Deterioration: Clinical Concerns • Issues 4.7-4.7.4 – Powerlessness as a Primary 	<p>The Applicant’s responses to SEAS’s concerns regarding psychosocial and mental health impacts of the Sea Link project demonstrate a systemic pattern of inadequate engagement and methodological shortcomings:</p> <p>Template-Style Responses:</p> <p>Across multiple issues (4.5.2–4.10.1), the Applicant repeatedly references Paragraph 3.9 and Table 2.10.31, providing nearly identical wording for each point. This shows no bespoke consideration of the actual qualitative and quantitative evidence provided by SEAS.</p>	<p>The Applicant’s responses to SEAS’s concerns have been provided in a structured and consistent manner, reflecting the systematic approach taken in the ES to address multiple interrelated issues. Recurring references to key methodological paragraphs and evidence sources ensure that all issues are addressed consistently and transparently. While some wording is repeated, this reflects the uniform application of the ES methodology and evidence base, rather than a lack of consideration. The approach demonstrates that SEAS’s concerns have been considered proportionately and in line with IEMA (2022) guidance for human health and wellbeing assessment.</p>
		<p>Neglect of Qualitative Evidence and Lived Experience</p> <p>Despite SEAS providing detailed survey data, personal testimonies, and thematic analysis demonstrating chronic stress, helplessness, environmental grief, and other psychosocial</p>	<p>The comments regarding the neglect of qualitative evidence, have been noted and previously considered within Table 2.61 (Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]). This addresses the matters raised in full.</p>

<p>Psychological Driver of Harm, and Institutional Betrayal</p> <ul style="list-style-type: none"> • Issues 4.8.1-4.8.2 – Environmental Grief and Eco-Trauma • Issues 4.9.1 – Disruption of Daily Life and Loss of Safety • Issues 4.10.1 – Socio-economic Instability and Relocation Stress 	<p>impacts, the Applicant bluntly dismisses this evidence as “non-representative” or “self-selected.” This ignores the explicit recognition in IEMA (2022, Determining Significance for Human Health in EIA) that qualitative evidence, community perceptions, and psychosocial pathways are relevant and necessary for assessing mental health outcomes</p>	<p>The Applicant maintains its position and does not agree that the Health and Wellbeing assessment is methodologically limited or that it fails to accord with HUDU (2019) or IEMA (2022) guidance. The assessment has been undertaken using a proportionate, evidence-led approach consistent with EIA practice and appropriate to the scale, nature and likely significance of effects identified.</p>
	<p>Misapplication of Psychosocial Principles</p> <p>The Applicant fails to account for key psychosocial mechanisms, including:</p> <ul style="list-style-type: none"> • Chronic stress from long-term, uncontrollable environmental threats • Feelings of powerlessness and institutional betrayal • Environmental grief and loss of place attachment • Sensory stressors affecting vulnerable populations • Economic insecurity and forced relocation effects <p>Their reliance on procedural adherence to IEMA guidance as a blanket justification is methodologically unsubstantiated, as IEMA explicitly requires consideration of these psychosocial pathways when assessing health and wellbeing.</p>	<p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been prepared in accordance with IEMA (2022) guidance, using recognised determinants, receptor sensitivity, exposure pathways, and professional judgement to assess potential effects on human health and wellbeing. While the mechanisms listed are noted, IEMA guidance requires a proportionate, evidence-based assessment of likely significant effects, rather than a separate analysis of each possible psychosocial pathway. These matters have been addressed previously in the Applicant’s responses to Issues 3.1–3.9 above, and within Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]). This addresses the matters raised in full. The Applicant therefore maintains that the methodology is robust, compliant with guidance, and no further assessment is required.</p>

Disregard for Community Effort

The Applicant's repeated dismissal of the SEAS survey and volunteer-led evidence as biased or insufficient demonstrates lack of respect for local engagement. These contributions reflect real, current psychological harm, which the Environmental Statement (APP-058) has otherwise ignored.

Furthermore, the Applicant's reliance on copy-and-paste, template-style responses does not merely disregard the community's evidence; it also places an unnecessary burden on the Examining Authority. This pattern of repetitive, non-specific replies not only overlooks substantive community evidence, but also risks undermining the diligence and integrity of the Examining Authority's review process, which approaches each submission with thoroughness and impartiality. By failing to provide bespoke, evidence-led responses, the Applicant prevents meaningful evaluation of psychosocial and mental health impacts, obscuring both the severity of harm experienced by the affected communities and the methodological deficiencies in the Environmental Statement.

Collectively, these failings demonstrate that the Applicant's methodology and responses are insufficiently evidence-led, fail to capture lived experience, and misinterpret psychosocial principles, undermining the robustness of the

As set out previously, the Applicant does not accept that its responses are generic or dismissive. Where similar points have been raised across multiple representations, cross-referencing has been used to provide a clear and proportionate response, rather than repeating the same explanation in full. This approach is intended to support the Examining Authority's review by maintaining consistency and clarity, not to disregard community evidence.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been prepared using a transparent and structured methodology in line with IEMA (2022) guidance. It draws on recognised datasets, established health determinants, and professional judgement to assess potential effects. While volunteer-led surveys and submissions have been considered, the Applicant maintains that such evidence does not provide a robust basis within the Environmental Statement. The Applicant therefore considers that Appendix 5 and the associated commentary largely repeat matters already addressed within Table 2.61 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**, and do not demonstrate a failure of methodology, engagement, or compliance with best practice in the assessment of health and wellbeing effects.

Environmental Statement regarding mental health and wellbeing impacts.

For ease of reference, Appendix 5 – Summary Table: SEAS Arguments vs Applicant Responses (Psychosocial & Mental Health) presents a summary table comparing SEAS arguments with the Applicant’s responses. The table highlights areas where the Applicant’s replies rely on standard template statements rather than engaging substantively with qualitative evidence, lived experience, or established psychosocial principles. It also provides a professional critique of methodological shortcomings in relation to mental health and psychosocial impacts, demonstrating where the Environmental Statement fails to adequately recognise chronic stress, environmental grief, powerlessness, sensory stressors, and economic insecurity as contributors to community harm.

Issue 5.1-5.4 Rebuttal: Study Conclusion – Public Mental Health Crisis

SEAS clearly highlighted that the survey evidence aligns with prior clinical expert predictions, showing serious, pervasive, and ongoing psychological harm in communities affected by Sea Link and associated NSIPs, including chronic stress, depression, powerlessness, environmental grief, disruption of daily life, and socioeconomic insecurity. This indicates the potential for cumulative psychosocial impacts of significant concern that is currently unfolding in East Suffolk.

However, the Applicant bluntly dismisses the findings by demonstrating the following:

The Applicant notes the points raised in relation to Issues 5.1–5.4 and considers them addressed through previous responses above, and within Table 2.61 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. This addresses the matters raised in full.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been prepared in accordance with IEMA (2022) guidance, using recognised determinants, baseline data and professional judgement to provide a

Template Repetition: The Applicant’s reply is identical to prior responses, referencing Paragraph 3.9 and Table 2.10.31. There is no engagement with the specific survey findings, qualitative testimonies, or the cumulative nature of harm highlighted in SEAS’s conclusion. This demonstrates the systemic “copy-paste” approach noted across previous entries, which fails to address the evidence substantively.

proportionate and robust assessment of likely significant effects, and the matters raised do not demonstrate a deficiency requiring further assessment.

Dismissal of Real Harm: The Applicant treats the evidence as “concerns” rather than acknowledging it as demonstrable psychosocial harm, thereby ignoring IEMA (2022) guidance, which explicitly recognises the need to integrate lived experience and psychosocial pathways, including uncertainty, loss of control, perceived threat, and cumulative stress, in assessing health and wellbeing impacts.

Ethical Oversight: By failing to account for the cumulative, long-term, and immersive nature of psychosocial impacts, the Applicant overlooks both the human and environmental dimensions of harm. SEAS’s conclusion rightly emphasises that respect for the environment and respect for local communities are inseparable, a principle absent in the Environmental Statement.

Therefore, the Applicant’s response demonstrates the same methodological shortcomings identified throughout previous entries: reliance on procedural adherence rather than evidence-led evaluation,

disregard for lived experience, and a misinterpretation of psychosocial principles.

Consequently, the Environmental Statement cannot be considered a robust, ethical, or valid foundation for decisions affecting both people and place.

Rebuttal: Overall Conclusion

The Environmental Statement (APP-058) fails to provide a reliable or ethically sound assessment of the mental health and wellbeing impacts of the Sea Link and associated NSIP projects. Despite clear evidence from SEAS’s community-led survey and qualitative testimonies, the Applicant has dismissed lived experience as “non-representative,” overlooked cumulative and chronic psychosocial stressors, and neglected vulnerable populations. Desk-based and secondary data approaches cannot substitute for primary, community-informed evidence, nor do they capture real, ongoing psychological harm. A new, independent, cumulative health and wellbeing assessment is therefore essential to safeguard public health, ensure methodological integrity, and ethically inform decision-making.

See responses above which address each of the points raised in the conclusion section of the rebuttal.

The following points summarise the key failings of the Applicant’s assessment, highlighting why the Environmental Statement cannot be considered fully substantiated to protect community mental health and wellbeing.

1. Community-Led Evidence Overlooked: SEAS has presented extensive, primary, community-led survey data and detailed testimonies demonstrating

measurable psychological and emotional harm. The Applicant's dismissal of these as "non-representative" ignores the lived experience of the affected population.

2. Cumulative and Chronic Psychosocial Impacts: The Environmental Statement (APP-058) fails to account for ongoing, cumulative psychosocial stressors, including:

- a. Chronic stress and emotional exhaustion
- b. Feelings of powerlessness and institutional betrayal
- c. Environmental grief and eco-trauma
- d. Disruption of daily routines, safety, and psychological stability
- e. Socioeconomic insecurity, forced relocation, and loss of home stability

3. Failure to Apply Psychosocial Principles: Despite IEMA (2022) guidance explicitly recognising the importance of qualitative evidence, community perceptions, and psychosocial pathways, the Applicant has relied predominantly on desk-based or secondary data, missing critical pathways that amplify mental health impacts.

4. Vulnerable Populations Neglected: Elderly residents, neurodivergent individuals, carers, and those with pre-existing conditions face heightened risks that are not adequately captured by the ES methodology.

5. Methodological and Ethical Deficiencies:

Procedural adherence to IEMA guidance does not compensate for the substantive failure to engage with communities meaningfully or consider real, ongoing psychosocial harm. The ES thus lacks both methodological robustness and ethical validity.

6. Need for Independent Assessment: A new, independent, community-informed cumulative health and wellbeing assessment is fully justified. Such an assessment should include:

- a. Primary data collection
- b. Detailed qualitative and quantitative evaluation
- c. Explicit consideration of vulnerable groups
- d. Realistic avoidance and mitigation strategies

The current Environmental Statement does not provide a reliable, evidence-led, or ethically sound basis for decision-making. The psychological and emotional harm is real, ongoing, and significant, and failure to address it properly undermines both the credibility of the ES and the protection of community wellbeing.

Appendix 1	Requested Evidence	<p>According to the UK’s Freedom of Information Act 2000, the Examining Authority is kindly requested to require the Applicant to publish the following evidence to verify that mental-health and psychosocial pathways have been appropriately scoped, assessed and provided for:</p> <p>1. HWB Scoping Log / Scoping Rationale (appendix to APP-058 Chapter 11);</p>	<p>1. HWB Scoping Log/Scoping Rationale (appendix to APP-058 Chapter 11);</p> <p>The following documents are available publicly:</p> <ul style="list-style-type: none">• Application Document 6.14 Environmental Scoping Report 2022 [APP-299];• Application Document 6.15 Scoping Opinion [APP-300]; and
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2. Minutes, attendee lists and outputs of the three Health & Wellbeing thematic meetings (labelled Meeting 1/2/3) and any materials circulated;

3. Public Health Consultation Responses and Action Log (all written responses from PHE/UKHSA and local public health teams and how each was addressed);

4. HWB Methodology and Indicators Appendix (operational indicators, data sources, decision rules for significance);

5. HWB Causal Pathways and Uncertainty Statements (diagrams and narrative);

6. HWB CEA — psychosocial endpoints extract (from APP-060 and relevant discipline CEAs).

7. HWB Monitoring and Triggers (REAC / CEMP extract showing monitoring methods, trigger thresholds and responsible parties) — APP-341 / APP-342;

8. REAC/CEMP psychosocial mitigation text and contractual/enforcement mechanism references; and

- **Application Document 6.3.1.6.A Appendix 1.6.A Response to Scoping Opinion [APP-094]**

2. Minutes, attendee lists and outputs of the three Health & Wellbeing thematic meetings (labelled Meeting 1/2/3) and any materials circulated.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] provides proportionate reporting of consultation and engagement undertaken, including a summary of key matters discussed and how these have informed the assessment, which is considered sufficient for the purposes of the EIA. **Application Document 5.1 Consultation Report [APP-301]** sets out the details of the targeted consultation and pre-submission engagement undertaken by the Applicant. Supporting documents are provided in Appendices C, D and F of the Consultation Report [**Application Document 5.1.4 Appendix C Non-Statutory Consultation [APP305] – Application Document 5.1.7 Appendix F Targeted Consultation [APP314]**]. These appendices explain how the Applicant has considered and responded to consultation comments, including matters relating to physical and mental health and wellbeing.

3. Public Health Consultation Responses and Action Log (all written responses from PHE/UKHSA and local public health teams and how each was addressed);

9. HWB Evidence Cross-Reference Table (Applicant claim → ES location → supporting document).

If the documents reveal deficiencies, the Applicant should be required to either undertake targeted HIA follow-up work (proportionate to the gap identified) or to provide explicit, enforceable monitoring/triggers and mitigation committed in the DCO Requirements that address psychosocial endpoints

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] provides proportionate reporting of consultation and engagement undertaken, including a summary of key matters discussed and how these have informed the assessment, which is considered sufficient for the purposes of the EIA. Additionally, **Application Document 5.1 Consultation Report [APP-301]**, sets out the details of the targeted consultation and pre-submission engagement undertaken by the Applicant. Supporting documents are provided in Appendices C, D and F of the Consultation Report [**Application Document 5.1.4 Appendix C Non-Statutory Consultation [APP305] – Application Document 5.1.7 Appendix F Targeted Consultation [APP314]**]. These appendices explain how the Applicant has considered and responded to consultation comments, including matters relating to physical and mental health and wellbeing.

4. HWB Methodology and Indicators Appendix (operational indicators, data sources, decision rules for significance);

The methodology is defined in Section 11.4 of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**.

5. HWB Causal Pathways and Uncertainty Statements (diagrams and narrative).

The methodology is defined in Section 11.4 of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. Specifically, the source-pathway receptor links for health determinants scoped into the assessment are set out in Table 11.7.

6. HWB CEA — psychosocial endpoints extract (from APP-060 and relevant discipline CEAs).

There are measures set out in **Application Document 9.83 Code of Construction Practice [REP3-076]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** to reduce or avoid adverse human health and wellbeing related impacts during the development. As the REAC and CEMP are further developed, the applicant will continue to liaise with the local authorities on the management of potential effects on mental health and wellbeing.

7. HWB Monitoring and Triggers (REAC / CEMP extract showing monitoring methods, trigger thresholds and responsible parties) — **Application Document 9.83 Code of Construction Practice [REP3-076]**;

There are measures set out in **Application Document 9.83 Code of Construction Practice [REP3-076]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** to reduce or

avoid adverse human health and wellbeing related impacts during the development. As the REAC and CEMP are further developed, the applicant will liaise with the local authorities on the management of potential effects on mental health and wellbeing.

8. REAC/CEMP psychosocial mitigation text and contractual/enforcement mechanism references; and

There are measures set out in **Application Document 9.83 Code of Construction Practice [REP3-076]** and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** to reduce or avoid adverse human health and wellbeing related impacts during the development. As the REAC and CEMP are further developed, the applicant will liaise with the local authorities on the management of potential effects on mental health and wellbeing.

9. HWB Evidence Cross-Reference Table (Applicant claim → ES location → supporting document).

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] already cross-references claims made within the Health and Wellbeing assessment to the relevant ES sections and supporting technical evidence throughout.

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Appendix A Applicant's Further Response to SEAS REP1-279

A.1 Applicant's Further Response to SEAS's REP1-279 on Mental Health and Wellbeing Regarding the Mind/ESC Survey Report.

- A.1.1 This document sets out the Applicant's further consideration following initial response to REP1-279 within Table 2.40 of **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** regarding the Mind/ESC Survey Report cited by SEAs.
- A.1.2 The Applicant recognises the importance of community wellbeing and mental health in areas experiencing change, including Aldeburgh, Leiston and Saxmundham. Potential effects on health and wellbeing have therefore been comprehensively assessed within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, prepared in accordance with established best practice, including IEMA's *Determining Significance for Human Health in Environmental Impact Assessment* (IEMA, 2022). The Applicant has previously provided targeted responses within **Application Document 9.34.1 (B) Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP3-014]** to clarify baseline data, methodological considerations, and how mental health has been robustly considered and assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. Those responses remain applicable.
- A.1.3 The Mind/ESC Survey Report cited by SEAS is based on findings from the Emotional Needs Audit, a tool developed by Suffolk Mind to measure self-reported emotional and physical wellbeing. The survey collected responses between 3 April 2025 and 25 June 2025, with results compared against data from the same geography gathered between 13 June 2022 and 14 March 2023. The survey focuses on average wellbeing across Aldeburgh, Leiston & Saxmundham (defined as the IP15, IP16 and IP17 postcode areas). While the survey provides useful qualitative insight into individual experiences, it is based on a relatively small sample of 251 respondents, representing approximately 1.8% of the population aged 16 and over within this impact area¹. As such, it is questionable whether the findings fully reflect community-wide conditions or outcomes, nor do they provide a substitute for the robust demographic and public health baseline analyses underpinning **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**.
- A.1.4 The Survey findings also show that overall wellbeing in Aldeburgh, Leiston and Saxmundham is comparatively positive. Appendix 4 demonstrates improvements since 2023 across several need domains, including sleep, security, control, and community, and confirms that the overall wellbeing score (1.31) is higher than the Suffolk average (0.94). These trends do not indicate a deterioration in wellbeing during the period in which the Proposed Project has been progressed, including periods of pre-submission

¹ Office for National Statistics. (2022). Census 2021

engagement undertaken between 2024 and 2025 and the submission of the DCO application in March 2025. Accordingly, the survey evidence does not substantiate claims that the Proposed Project is giving rise to adverse community-wide wellbeing effects and highlights the need to interpret the survey findings carefully and within a broader evidence base.

- A.1.5 The Mind/ESC Survey Report considers wellbeing in the context of multiple Nationally Significant Infrastructure Projects across the area and does not distinguish between individual projects. As a result, the findings on mental wellbeing cannot be attributed to the Proposed Project specifically, nor can they be used to draw conclusions about its individual contribution to health and wellbeing outcomes. It is therefore questionable whether the survey is sufficiently able to assess the scale or nature of any effects arising from the Proposed Project or indeed its interaction with other projects. While this approach is helpful for understanding how some residents feel about change more generally, it does not align with the ES requirement to assess likely significant effects arising from the Proposed Project. In particular, it does not account for the defined mitigation measures included in the project design, which are intended to reduce or avoid adverse impacts during the construction and operational phases of the Proposed Project. As such, the survey findings cannot be meaningfully extrapolated to the construction and operational phases of the Proposed Project, which are the phases assessed within the ES. The assessment considers effects that could realistically arise should the project be consented, with mitigation secured through the Development Consent Order (DCO). This limits the relevance of the survey for informing project-specific conclusions within the ES.
- A.1.6 Within its conclusion, the Mind/ESC Survey Report states that “*when considering how things could change going forwards...respondents spoke about wanting an increase in honesty, respect and consideration of the community – both in terms of inclusion in conversations and acknowledgement of the mitigations that are required to make up for the damage being done*”. The Applicant recognises the importance of this and notes ongoing engagement is a core part of the project approach and has informed both project design and mitigation. As set out in **Application Document 5.1 Consultation Report [APP-301]**, extensive consultation has informed project design and mitigation to date, and this engagement will continue through construction and operation via dedicated community relations arrangements and clear communication channels. Specifically, control and management measure GG27 that is secured within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]** sets out the specific commitment that members of the community and local businesses will be kept informed regularly of the works through active community liaison. The Applicant remains committed to open dialogue and to ensuring that mitigation measures are clearly communicated and delivered as the project progresses. Full detail on these processes and engagement activities has been provided in **Application Document 9.34.1 (B) Applicant’s Detailed Responses to Relevant Representations identified by the ExA [REP2-014]**.
- A.1.7 The Applicant acknowledges the Mind/ESC Survey Report in its entirety and recognises the value of the survey in capturing how some residents feel about their wellbeing and about change in their area. However, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** adopts a structured and proportionate approach in line with IEMA guidance, drawing on established public health data, demographic information, and consultation feedback received through formal engagement processes. This approach ensures that mental health and wellbeing considerations are embedded within a wider, balanced assessment of potential effects. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**

[APP-058] remains an appropriate evaluation of potential impacts associated with the Proposed Project, and concludes that no significant effects on community health and wellbeing are anticipated.

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com