The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.128: Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240

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1. Introduction

1.1.1 This document has been prepared by the Applicant in response to the following representations made by Nicholas Bridges:

- SEAS Written Representation of their ISH2 Oral Representation on Landscape & Visualisation, Cultural Heritage & Design **(Application Document Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority [REP4-240])**;
- Nicholas Bridges Responses to ExQ1 **(Application Document Late Deadline 3 Submission - Responses to ExQ1 - Accepted at the discretion of Examining authority [REP3-132])**; and
- Relevant Representation by Nicholas Bridges [**RR-3944**]

1.1.2 There are separate tables set out which respond to each of the above representations. The most recent representation **(Application Document Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority [REP4-240])** is responded to first in **Table 2.1**, with **Application Document Late Deadline 3 Submission - Responses to ExQ1 - Accepted at the discretion of Examining authority [REP3-132]** responded to in **Table 3.1**and **RR-3944** in **Table 4.1.**

1.1.3 Where similar points are made across the representations, an initial response is provided by the Applicant and thereafter cross referenced in subsequent responses to avoid duplication.

2. Response to Suffolk Energy Action Solutions Late Deadline 4 Submission by Nicholas Bridges Associates on Landscape & Visualisation, Cultural Heritage & Design [REP4-240]

Table 2.1 Applicant's Response to Suffolk Energy Action Solutions Late Deadline 4 Submission by Nicholas Bridges Associates on Landscape & Visualisation, Cultural Heritage & Design [REP4-240]

Paragraph No or AP No	Point Raised	Applicant's Response
2 Landscape and Visual ISH2 Agenda Item 9 - Action Points AP39 – AP51		
AP 39	**ISH2 9.2 Assessment of effects on landscape character in (Kent and) Suffolk and AP39.** **VP1** – Whether the sides of the PROW are channelled or screened, the extent of the change and scale of the proposed converter station(s) will cause permanent significant harm to the character of the SCDC (ESC) Landscape Area L1. This applies to the other VPs 3, 4, 5, 6, 7, 8, 15, 16, 17, & 21 in L1. **VP2** – The elevated VP on the west side of the Fromus valley exposed the converter station in the broad gap in Bloomfield Covert on the eastern ridge. This is despite it being sited at the lower end of the Site and as far south, trying to restrict views of the northern end of the proposed buildings. It will take many more than 15 years for the mitigation to achieve sufficient height to mask some or all. The night-time lighting will be visible. The verified views seem to show the mass of the proposed project in different positions, using a telephone pole as a reference in the extracts below. Accuracy is critical and the applicant is requested to check if the CAD model has moved or changed, or if the camera positions are different. **VP4** – The dynamic visibility as in the VP from much of the B1119 will extend the extent of the permanent harm remaining unmitigated even after 15 years. **VP5** – Another dynamic VP on an all-weather PROW with no planting proposed along its edge which would screen views of the proposed development. Looking up the contours to it on the horizon increases its exposure. **VP19** – Another VP at the junction with a public footpath on a higher plateau looking north across the valley at the Site on the plateau opposite. The elevated VP exposes the full height of the proposed project with little obscuration from existing woodland. Mitigation planting will have very little effect. **VP20** – A similar effect as VP19 with this VP to the west of the Fromus valley looking across at the gap in the Bloomfield Covert. The mass of the proposed project appears more visible through the tree canopy during in the winter. **VP21** – Another dynamic view on this access track with no planting beside it until about 150m from the B1119. **Summary:** The range of verified views above illustrate that the proposed visual and landscape mitigation is not a panacea for the residual harm which has not been eliminated by good design. Even after 15 years the proposed planting will not hide the high and widespread converter and substation buildings with	The Applicant's response to AP39 is contained in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. **VP1** – **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** acknowledges that due to the scale and nature of the Suffolk Onshore Scheme that within a localised area of LCA L1 there would remain a large alteration to the key characteristics of the LCA, including the deeply rural character and the limited intrusion from modern development resulting in residual significant adverse effects on LCA L1. **VP2** - **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** acknowledges that residual significant adverse effects would remain from viewpoint 2. However, the siting of the Proposed Development as far south in the site as possible would substantially screen sections of the built form by Bloomfield Covert as illustrated in **Application Document - 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 - Accepted at the discretion of the Examining Authority [REP1-296]**. The Applicant can confirm that the 3D illustrative model for the Saxmundham Converter Station (**Application Document Late Deadline 1 Submission - 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 - Accepted at the discretion of the Examining Authority [REP1-296]**) has not been moved or changed. In viewpoint 2, the camera positions are slightly different between the winter and summer photography which is identified on the visualisation sheets: 

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	attendant wirescapes, as demonstrated in the submitted verified views and proposed [APP-037] 2.12 Design and Layout Plans. The landscape character is not merely what is seen from a few selective locations but what is perceived more widely. The area taken for developments at Saxmundham with 250m square plots and Friston on a plot 150m by 112m is extensive and full of wires, plant and huge sheds with no mitigation at all possible within their secure areas. Surrounding them with trees will not lose the perception when moving through the countryside of the sheer extent of the transformation. The rural character will be lost for ever	The winter baseline photography was taken in 2025 and was captured from a slightly different location from the summer baseline photography in 2023. The slightly different locations have caused slightly different perspective, so even if the telephone pole is compared to the existing tree, the relationship is not exactly the same between the two images because of their slightly different locations. **VP4 - Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** acknowledges that residual significant adverse effects would remain from viewpoint 4. **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]** provides an assessment of users of the B1119 road to the west. **VP5** – Refer to **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** for a detailed response to viewpoint 5 and opportunities for mitigation. **VP19 - Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** acknowledges that residual significant adverse effects would remain from viewpoint 19. From this location a proportion of the Saxmundham Converter Station would be screened by existing intervening vegetation within the landscape with the upper extent of the taller buildings remaining visible, which additional planting within the Order Limits would not screen. **VP20 and 21** - Refer to **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** for a detailed response to viewpoints 20 and 21 and opportunities for mitigation.
AP45	**Cumulative effects on the Area of Outstanding Natural Beauty (AONB)** Please refer to my detailed comments on Natural Beauty Indicators to ExQ1 – 1LVIA9 in [REP3-132], pages 11-12. The Applicant has not assessed scoped-out designated heritage assets in the Alde Estuary such as St. Botulph's Church, Iken and Martello Tower CC at Slaughden. For further relevant information, please refer also to ISH2 11 and AP52 below.	Refer to the Applicant's response in Table 1.2 below regarding **Application Document Late Deadline 3 Submission - Responses to ExQ1 - Accepted at the discretion of Examining authority** [**REP3-132]** and 1LVIA9. Also refer to Cultural Heritage point 4.1 below regarding AP52.
AP46	**Heritage Coast** Please refer to my detailed comments on the definition of the Heritage Coast to ExQ1 – 1LVIA11 in [REP3-132], pages 13-14.	Refer to the Applicant's response in Table 1.2 below regarding **Application Document Late Deadline 3 Submission - Responses to ExQ1 - Accepted at the discretion of Examining authority [REP3-132]** and 1LVIA11.
AP47	**Whether the development is compatible with the special character of the Heritage Coast** Even though the Site is not within the area identified in policy as the Heritage Coast, the potential effects on its undeveloped setting from the proposals for Saxmundham and Friston have not been fully assessed for either project. The whole of the Alde estuary is within the Heritage Coast. The application's Area of Search excluded all of it, so the Applicant has not identified receptors, nor assessed them, nor the effects on them from the proposed project. A desk-based assessment as proposed by the Applicant at ISH2 is not a robust methodology for the multiple designations covering the Alde estuary. Please refer to my detailed comments on the historic, architectural and landscape significance of the Alde estuary in Topic A and Appendix A in my Relevant representation –June 2025 [RR3944]	The Applicant has provided a detailed response to the Relevant Representation [**RR-0091**] by the Alde and Ore Association and explained why the Alde estuary is not part of the Landscape and Visual Impact Assessment study area. The Applicant's response is contained in **Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2** [**REP4-094**]. Furthermore, the Applicant confirmed in response to AP47 in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)** [**REP4-086**] that there is no permanent infrastructure sited within the Heritage Coast or its setting. The only effects are associated with the construction of the landfall and HVDC cable corridor, which along with their reinstatement would result in short term, temporary and minor adverse, not significant effects. The Applicant therefore considers that the temporary nature of the Proposed Project's interface with the Heritage Coast is compatible with the special character.

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AP48	**If you consider the development is not compatible with the special character of the Heritage Coast, explain why not and suggest whether this could be overcome by mitigation and if so, provide details of suggested mitigation.** The omission of the Grade II listed St. Botulph's Church, Iken from the ES has missed understanding of its historical interest which is directly related to the Saint's arrival in 654AD and establishment of his monastery on a coralline crag outcrop in the Alde estuary. The parallels with St. Augustine arriving at Richborough, Kent are striking and relevant. The historical significance of place and events in the setting there was the key reason for a planning inspector to uphold the refusal of planning permission for development within it. Please refer to my involvement with and detailed comments on this case which is relevant to the inclusion of heritage assets within the heritage coast, can be found in ExQ1 – 1CH3 in [REP3-132], pages 17-19.	Refer to the Applicant's response to Cultural Heritage 4.4 below with regard to the scoping out of heritage assets including St. Botulph's Church, Iken. Refer to Table 1.2 below for the Applicant's response to ExQ1 – 1CH3 in **Application Document Late Deadline 3 Submission - Responses to ExQ1 - Accepted at the discretion of Examining authority** [**REP3-132**].
AP49	**Having regard to paragraph 5.10.32 of the NPS EN-1 which sets out the exceptional circumstances in which the SoS may grant development consent in the AONB, can the relevant local authorities explain whether they think the circumstances are exceptional, and if not, why not?** The need for development: There is a need to onshore the energy created offshore, but there is no need for it to be brought into East Suffolk which has no use for the power and is a huge exporter already. Finding users for the power is not necessary either as new industry would be entirely inappropriate in this countryside and agriculturally productive land. The cost of, and scope for, developing all or part of the development elsewhere etc.: Options for taking the offshore power as HVDC to brownfield sites closer to where it will be used have never been explained convincingly by the applicant. This is demonstrated by the absence of any strategy for this area by the applicant and the multiple conflicting DCOs for over a decade. Any detrimental effects on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated: The scale of this proposed development and others latching onto it will accumulate permanent harm on many diverse receptors. There are no recreational opportunities – studies have shown the development will upset the existing tourist trade, harming the local economy, and will not entice replacements.	Refer to **Application Document 9.129 Applicant's Response to ExQ2 2GEN1 and 2GEN2 in respect of Need** submitted at Deadline 5.
AP50	**Kiln Lane substation mitigation** The Friston ExA considered the harm of its Landscape & Visual effects should not be underestimated. Mitigation has in certain key respects been found to be only just sufficient, on balance. [para 28.4.5]Even with the lack of sufficient information on Sea Link and LionLink, the ExA observed that the effects of the cumulative delivery of its proposed development with the other East Anglian development on the transmission connection site at Friston are so substantially adverse that the utmost care will be required in the consideration of any amendments or additions [28.4.5]. The ExA's Report for EA1N and EA2 [EN010077-009800 Volume 2, 31.2.1] drew attention to the "marginal compliance of ES topics flood risk, historic environment	The updated Friston outline landscape mitigation was updated and submitted at Deadline 4 (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk** [**REP4-065**]) and provides a consistent approach to the landscape design for Kiln Lane substation under Friston Scenario 2 with SPR's discharged detailed substation landscape proposals. In addition, Figure D-1 contained in **Appendix D of Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** demonstrates how the interface of the Sea Link HVDC and HVAC cables at Kiln Lane substation under Friston Scenario 1 would not compromise the effectiveness of the landscape mitigation planting implemented by SPR at Friston.

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	and landscape and visual character onshore." Therefore, it is essential that the landscape mitigation required in the Friston DCOs is implemented for the NGET substation which is part of the Sea Link DCO application. This was the conclusion without having all the facts we now have before us now. It is the baseline for assessing the cumulative impact. Adding Sea Link's harm to Friston's tips the balance against Sea Link.	
AP51	**The ExA notes the applicant's comments in response to the first written question 1LVIA4 and the provision of the illustrated lux plots. However, there is insufficient information to assess the lighting effects in areas of relatively dark skies. A more detailed nighttime assessment is therefore requested.** A Lighting Design Guide was published in July 2023 jointly by the Dedham Vale and Suffolk & Essex Coasts & Heaths AONBs National Landscapes. Its purpose is to protect the night sky by promoting good practice in external lighting and internal light spill. It provides guidance to anyone who is using, replacing, or installing new external lighting in or around the two National Landscapes. This includes householders, businesses and developers. The extract (right) from the CPRE's light pollution – dark skies map shows the sky between Saxmundham and Leiston is some of the darkest and which includes the application Site. It is also dark southwards towards and over the Alde and Ore estuaries to Orford and the Ness. The red area on the edge is Sizewell - not a good exemplar.	The Applicant has provided a nighttime assessment within **Application Document 9.124 Landscape and Visual Nighttime Assessment** submitted at Deadline 5. The nighttime assessment contains baseline analysis of the nighttime landscape and views considering desk-based analysis including the CPRE mapping as well as site specific nighttime survey. In addition, the Design Principles (**Application Document 7.12.1 (B) Design Principles – Suffolk [REP4-073]**) have specifically responded to The Dedham Vale and Coast & Heaths National Landscape Lighting Design Guide (Darkscape Consulting, 2023)
3. Good Design Agenda Item 10		
ISH2 10.1	**Adequacy of design controls** (See REP4-240 paragraphs 3.2-3.5)	It is clearly incorrect that there has been no coordinated and effective strategy to projects in East Suffolk; quite the opposite is evident in particular through the co-location of the EA1N, EA2 and National Grid substations at Friston; and advanced planning for the co-location of converter stations for Sea Link, Lionlink and, formerly, Nautilus near Saxmundham. This co-location adds significant complexity to projects, but has been pursued successfully with the strategy of co-locating the converter stations and substations supported by local authorities. As discussed throughout the Examination, engagement between developers has been extensive, including with developers whose projects are very much in their infancy, such as Helios. Assessment of cumulative impacts it necessarily an iterative process, with updates being made as further information becomes available, both from projects where detailed design is proceeding (e.g. EA2) and where applications are not submitted (e.g. LionLink). This has been carried out robustly, transparently and diligently. It is unclear to the Applicant why there is a view amongst some stakeholders that developers have not been holding discussions, particularly given that SEAS members have been present at meetings and workshops where several developers have been present and discussing interactions.
ISH2 10.2	**Embedding of good design in decision making processes** (See REP4-240 paragraphs 3.6-3.22)	In response to paragraph 3.12 *'A DCO is the same as a planning permission or listed building consent',* the Applicant agrees that a DCO is similar to a planning application or listed building consent in that it exerts control over development; but would emphasise that there are very significant differences between consenting regimes in terms of the design detail required. Listed building consents by their very nature are focused on the precise detail of design, with colour, materials, and small architectural details potentially making the difference between a

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		consent and a refusal. This is understandable given that listed building consents are designed to control works to designated heritage assets, often where design is a key element of the designation. There is no need for this level of control over most types of development; indeed many details required on listed building consents (e.g. window type) can be installed on other buildings without any application under the Town and Country Planning Act (General Permitted Development Order) 2015. A full planning application requires less design detail than a listed building application. It may include details of the design of buildings, where present, but often even for full applications there would not be provision of details such as colours and materials in the main application, with these details dealt with via planning conditions after consent. For infrastructure projects consented under the Town and Country Planning Act (TCPA) regime, there tends to be less detail on the design even for full applications because the design is heavily engineering led with far less ability for the design to be influenced by local planning authorities or other parties. Again, colours, building finishes etc are typically dealt with by condition where required. An outline planning application under the TCPA has even less detail, even for a housing estate where design can be architecturally led rather than requiring complex engineering designs. These applications may only specify 'up to' a number of dwellings and provide examples of several house types. The developments are generally consented without details such as fixed layouts and dwelling designs. The level of detail provided for DCO applications is often more comparable to outline TCPA consents, although in places the level of detail provided on Sea Link is arguably more developed and less flexible than many outline TCPA applications. In the above context, the Applicant disagrees that it is appropriate to suggest that the level of design detail provided for a listed building application or TCPA application is suitable for a major infrastructure project. However, the Applicant would also argue that the detail provided on Sea Link is not less than typically provided either for similar projects consented through the DCO regime, or even for very different projects (e.g. housing) consented through the TCPA. The Application documents contain design documents that SEAS acknowledges are 'competent'; and the Applicant would argue show best practice in terms of what can be achieved with this type of project. It is also incorrect to suggest that relevant planning authorities have no control over design. Requirement 6 contains a very large number of management plans to be approved by the relevant planning authorities, including notably the Landscape and Ecological Management Plans and Drainage Management Plans. Requirement 3 also provides design approval for elements of the project where design is flexible, as well as requiring compliance with the Key Design Principles, which were developed through extensive engagement, including with local authorities and the design panel. However, it should be noted that on most aspects of the project, as with most transmission projects, there is very limited flexibility in the appearance due to it mainly comprising functional equipment and it then becomes disproportional to include approval processes that will not influence design, but can influence cost and programme of critical major infrastructure projects. This is an important and relevant matter when considering whether it is appropriate to require further consultation or approvals on design matters. The SEAS comments also state that: *'It is possible and desirable for the DCO Order to allow some variation of the precise location or height following construction detailing. But not the design's fundamental volumes, locations and appearance in the landscape.'* The Applicant disagrees that 'fundamental volumes, locations and appearance' are not fixed. The limits of deviation for the converter and substations in the Sea Link project are actually very limited, allowing for only very minor movements within the site. The maximum height parameters are fixed in the draft DCO for all key elements of the project. The appearance of most aspects of both

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		the substations and converter stations are fixed because they comprise equipment such as gantries that have no or very limited flexibility in appearance. There is flexibility in appearance on matters such as the colour of the panels of the buildings and these details are subject to Requirement 3 in the draft DCO; but it should be noted that even in full applications consented under the TCPA this level of detail is generally dealt with by condition. In the case of Friston substation, the applicant has committed to particular building colours, providing more information than would normally be present even in a full TCPA application for housing. This is despite the fact that this building is a maximum of 16 m tall and surrounded to the north and south by equipment of a height of up to 14 m high, and significant landscaping; meaning that the building itself will often be hidden by landscaping and/ or obscured by the outdoor equipment. The Applicant welcomes the recognition of the very significant design detail submitted by the Applicant in paragraphs 3.17-3.20, which goes beyond that typically provided for this type of project. **Application Document 2.13 Design and Layout Plans** [**APP-037**] provide layouts and designs based on the best available information and the substations and converter stations are likely to look very similar to these plans. However, detailed designs have not yet been undertaken and fixing these layouts in advance of these designs will reduce flexibility in a way that may render a project undevelopable. The design of substations and converter stations will evolve in response to matters such as detailed ground investigations, drainage design, availability of equipment, progression of other projects, technological advancements; and in response to locally approved matters such as landscaping design. Reducing this flexibility is neither necessary nor desirable for the progression of a well-designed project.
4. Cultural Heritage ISH2 Agenda Item 11 - Action Points AP52 to AP55		
4.1	In relation to ISH2 Action Point 52 – Scoped out heritage assets. The applicant has scoped out many designated assets on the basis of less than substantial harm without showing how it has arrived at these conclusions. Firstly, evidence of the assessments should be submitted to confirm the conclusions. Secondly, it is possible that if a large number of heritage assets are affected at less than substantial harm, the accumulation of this harm may indicate an overall greater effect which is significant in the ES methodology	In relation to the first point raised, the assessments requested by the Examining Authority under Action Point 52 were provided at Deadline 4 in **Application Document Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**. In relation to the second point raised, the presence of impacts on a number of individual heritage assets does not result in a requirement to report a greater overall effect to heritage. There is no overarching 'heritage' receptor. There is no historic environment statute, policy or guidance that requires assessment to be made of what we will term 'collective impact/harm' to cultural heritage. Impact/harm to assets is assessed on an individual basis and the planning balance is carried out to determine whether the identified harms are outweighed by public benefits.
4.2	In relation to ISH2 Action Point 52 – Scoped out heritage assets. The cluster of 16 listed buildings within Sternfield village has a Group Value from the long established community. They characterise a typical old Suffolk village whose time history is readable. The topographical context of its own valley and proximity to the River Fromus are special. The change in the character of the village's setting, from the proximity and the proposed project's scale and industrialisation of the countryside, will be fundamental and permanently harmful.	No harm has been identified to the cluster of 16 listed buildings in Sternfield, and Sternfield is not a conservation area. These assets were scoped out of assessment in the ES due to the lack of potential for impacts to arise as a result of change to their settings. Historic England (in **Application Document Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 [REP4-122]** and **Application Document Responses to ExQ1 [REP3-089]** from Historic England) and East Suffolk Council (in **Application Document Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 - Issue Specific Hearing 2 (ISH2) [REP4-117]**) have confirmed their agreement with this scoping exercise and have raised no concerns regarding assets in Sternfield village.
4.3	In relation to ISH2 Action Point 52 – Scoped out heritage assets. Historic England's response has not applied its own policy of Setting – GPA 3: The Setting of Heritage Assets, page 8, which give the approach to be followed for multiple assets. This was also covered in my detailed response in ExQ1 -	Page 8 of Historic England's Good Practice Advice Note 3 (Historic England, 2017) states that in cases where multiple assets are affected detailed assessment, including EIA, may be required. It also states that '*technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of*

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	1CH3 in [REP3-132], pages 19 to 21. Setting is not confined to views and intervisibility as stated by the applicant at ISH2.	*the development upon them.*' This guidance has been followed in the cultural heritage assessments provided in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** and in all subsequent heritage responses submitted throughout the Examination process. The Applicant acknowledges that setting is not confined to views and intervisibility and disputes that this was stated at ISH2. What was stated was that the impact that East Suffolk Council have identified at the Grade II listed Hill Farmhouse (NHLE: 1231296) is being expressed in terms of an impact to a view, Viewpoint 5, and so the comments made by the Applicant at ISH2 related specifically to this view in response.
4.4	In relation to ISH2 Action Point 52 – Scoped out heritage assets. The narrow area of search excluded the Alde estuary, St. Botuph's, Iken, and Martello Tower CC at Slaughden from where the PEIR ZTV plans showed Sea Link, EA2N and EA1 would all be visible. NGET have not produced a more complete set of ZTV plans despite multiple requests. They cannot scope the estuary out of the Landscape and Visual and Cultural Heritage without a proper baseline appraisal. This lack of heritage assessment before eliminating multiple designated heritage assets undermines the basis of both topics within the ES.	The Grade II listed Church of St Botolph [NHLE: 1198033] and the scheduled monument and Grade II* listed building Martello Tower CC [NHLE: 1006041; 1269724] in the Alde Estuary are located outside the formal 2 km study area adopted for the assessment of effects to heritage assets through change to their settings. This study area was determined using professional judgement and was agreed with the Local Authority and Historic England at the Scoping stage, as noted in the consultation summary provided in Table 3.5 in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The study is an appropriate and proportionate assessment area aimed at identifying potential significant effects to heritage assets, rather than the area from which the Suffolk Onshore Scheme would be theoretically visible. It is the Applicant's view that assets such as the Church of St. Botolph and Martello Tower CC, both located outside the study area, do not have the capacity for impacts due to the presence of the scheme within their settings. Despite this, an action was taken at ISH2 to provide an assessment of these two assets in response to a request from the Examining Authority. This assessment is provided below. It is informed by a site visit to the assets in question and their settings carried out in February 2026. It is noted by Historic England in **Application Document Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 [REP4-122]** that they have no concerns regarding the two assets in question and do not see any capacity for impacts to these assets as a result of the Suffolk Onshore Scheme. <u>Grade II listed Church of St Botolph [NHLE: 1198033]</u> The Church of St Botolph is the Parish Church of Iken and was constructed in the late 11th / early-12th century (nave) and has a 15th century west tower and south porch a mid-19th century chancel. Windows in the nave were remodelled in the 14th century. At the time of listing the nave had been burnt out following a fire in the 1960s, however, this has since been restored. It is rendered externally and has a thatched roof. The west tower is constructed in knapped flint with inlaid sandstone details to the base and crenels and corner buttresses with sandstone quoins. The chancel is of well-coursed Kentish ragstone masonry under a red tiled roof. All elements of these materials are present in the south porch which is rendered to the east and west sides and knapped flint and tile to the south side. The contrasting materials and roof coverings across the three main elements of the church are a fortuitously aesthetic composition that provides architectural interest and assists in understanding the historical and archaeological interests in the development of the church over time. The site of the church may have great importance in the early establishment of Christianity in as it is one of three sites that are considered to be the possible site of the minster established by St Botolph referred to in the Saxon Chronicle in AD 654 as being at '*Icanhoh*'. '*Icanhoh'* may be 'Iken', and the siting of the present church on a broad promontory in the Alde Estuary could feasibly be the location of the early minster, although no archaeological evidence has been uncovered to confirm this.

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		The churchyard to the present building is broadly ovoid which can be an indicator of an earlier Saxon foundation (Blair 1992). Inside the church there are the remains of a stone cross shaft dating to c. AD 900 and archaeological excavations carried out in the 1970s uncovered the remains of an earlier church dating to the 10th century underlying the present chancel. These aspects of the history of the site add to the historic interest of the present building and form part of its historical setting despite not being related to this physical building. The naming of the church after St Botolph is also of note, with many churches across East Anglia and Norfolk being dedicated to this Saint who is attributed with establishing the Benedictine Order in England. The church is a Grade II listed building on medium heritage value as per definitions provided in Table 3.8 in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The church is located on a promontory extending into a bend in the River Alde. It has a surrounding churchyard with upstanding grave memorials, which is bounded by mature trees and access via a pedestrian gate to its southwest side. To its west side the ornate brick chimneys of its former rectory are visible on approach. The attractiveness of the setting and the tranquillity of the area contribute to the appreciation of the architectural and aesthetic quality of the building, whist the estuarine location allows for consideration of the earlier history of the site as the possible site of St Botolph's first minster, from where the word of Christianity was potentially spread. The church tower is visible between and above the trees that bound the churchyard in views from either side of the Alde giving it a landmark quality that is enhanced by the attractiveness of its estuarine location. Regular pilgrimage takes place to the church from Snape Maltings along the south side of the Alde where the destination of the church tower is clearly visible along the route jutting out into the estuary. These aspects of the asset's setting make a positive contribution to its understanding and its heritage value. The permanent above ground infrastructure forming part of the Suffolk Onshore Scheme would be located inland across the Alde to the north of the asset at a distance of 4.5 km at its closest extent at the proposed Friston Substation, while the Saxmundham Converter Station would be approximately 5.5 km away. The land within the site of the Friston Substation and the sites of the other elements of above ground infrastructure forming the Suffolk Onshore Scheme does not form part of the functional or visual setting of the asset, being inland of the estuary and beyond areas of intervening woodland. It is not clear whether or not the proposed above ground infrastructure would be visible from the roof of the church tower, however, this would not impede understanding of the asset's heritage value and setting within the estuary. Therefore, no impact is identified to this asset, resulting in a **neutral** effect that is not significant in EIA terms. (Blair, 1992) <u>Scheduled Monument and Grade II* Listed Martello Tower [NHLE: 1006041; 1269724]</u> The Martello Tower in Aldeburgh was constructed between 1808 and 1810 to designs of Colonel Twiss and Captain Ford. It is of a unique design in the south and east coast of Britian, being quatrefoil in plan, and it is surrounded by a deep moat that is still largely extant, except to the east side where it has been eroded by the sea. The quatrefoil design allowed for four gun platforms to be accommodated on the roof of this tower, as opposed to the usual three, thus providing a 360-degree field of fire. The tower is constructed in red brick on a granite plinth with stone reveals to the entrance on the west side (accessed via a replacement bridge across the moat) and to the limited number of round-headed windows throughout. The tower is located on the Orford Ness peninsula south of the town of Aldeburgh where it has the sea to the east and the River Alde to the west. It is the most northerly and largest of a line of Martello Towers that were constructed along the east coast in response to the Napoleonic War. Between 1796 and 1815, 194 such towers were constructed in Britain and its dependencies, their intended purpose to strengthen existing coastal batteries, to protect the coastline from enemy

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		landings and to guard estuaries and marshlands. This latter purpose may go some way to explaining the unusual quatrefoil design at this Martello tower as the additional gun platform it afforded allowed it a 360-degree field of fire to cover both the sea and the Alde Estuary. This tower is recorded as being fitted with two 24 pounder guns in 1815. Depending on the projectiles used and the conditions of fire, these could fire heavy shot up to a maximum distance of 2.2 km. The effectiveness of the chains of Martello Towers were never tested in combat during the Napoleonic Wars. A large number of towers were subsequently used as observation posts for the coastguard and became useful gun emplacements during the World Wars. In this case the tower was retained in use, being fitted with replacement guns in the late 19th century, until it was sold in 1932. At this time the small fishing village at Slaughden to the north of the tower was still present but by 1936 it had been lost to the sea. In 1941 the tower was commandeered as a military watch tower. It was restored in the 1970s and is now run as holiday let by the Landmark Trust conservation charity. As a scheduled monument and Grade II* listed building the asset is of high value as per definitions provided in Table 3.8 in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The setting of the asset comprises its strategic siting on the Orford Ness peninsula from where it could protect both the east coastline and the Alde Estuary to the west. It is also informed by the relationship between this tower and others in the defensive line along the east coast. Its purpose as the northernmost of these adds to its significance as the terminus of the group. The form of the tower is unique, and this rarity can be understood through understanding of the asset's siting and purpose through its setting. Views of and from the asset feature its landscape setting on the shingle spur contributing to understanding of its function in the protection of the coast and estuary. With a 360-degree field of fire unincumbered functional views over the local topography and particularly the sea and river are a key component its setting. The permanent above ground infrastructure forming part of the Suffolk Onshore Scheme would be located inland to the north-west of the asset at a distance of 8 km at its closest extent at the proposed Friston Substation, while the Saxmundham Converter Station would be approximately 9.5 km away. The land within the site of the Friston Substation and the sites of the other elements of above ground infrastructure forming the Suffolk Onshore Scheme does not form part of the functional setting of the asset, being inland of the estuary and far outside the asset's effective field of fire which would have been limited to 2.2 km had ever seen action in the Napoleonic War. Whilst views from the asset could go further than this, whether or not the proposed above ground infrastructure would be visible from the gun platform on the roof of the asset, this would not impede understanding of the asset's heritage value and purpose in protecting the coast and estuary. Therefore, no impact is identified to this asset, resulting in a **neutral** effect that is not significant in EIA terms.
4.5	In relation to ISH2 Action Point 53 – Assets in Friston and EA1N / EA2 schemes The design of Sea Link has larger buildings and more extensive development areas, different access, viewpoints and mitigation, all in a different location and surroundings from the approved EA1N and EA2 project. The heritage assets will be affected differently and should be assessed anew.	The Friston Substation and associated alteration to pylons that forms part of the Suffolk Onshore Scheme is also part of the EA1N and EA2 schemes. If the whole of the approved EA1N and EA2 Schemes are built, this built out scheme, which is larger and closer to assets in Friston, would be the future baseline for heritage assessment of the effects of the Suffolk Onshore Scheme. Such effects would be assessed as any additional effects arising from the Suffolk Onshore Scheme that would arise with the EA1N/EA2 schemes already in place. This accounts for the elements of the two schemes that are different, such as Saxmundham Converter Station and its permanent access, as well as recognising that if EA1N/EA2 schemes are already in place the impacts to assets in Friston would already have taken place in relation to the larger EA1N/EA2 schemes. This scenario was what was assessed in the cultural heritage assessments provided in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural**

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		Heritage Baseline Report [APP-109]. This found that in relation to assets in Friston there would be no further effects arising from the Suffolk Onshore Scheme to assets in Friston and all assets in Friston were scoped out of full assessment in the ES Chapter. A second scenario has since been assessed in response to ISH2 Action Point 53 and this was presented in Appendix B of **Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**. This assessed the presence of Friston substation and associated infrastructure as though it was constructed for the Suffolk Onshore Scheme in the absence of the other elements of the larger EA1N/EA2 schemes being built. This identified impacts to assets in Friston as a result of this scenario.
4.6	In relation to ISH2 Action Point 54 – List of scoped in assets See response to AP52 above.	The table requested by the Examining Authority under Action Point 54 was provided at Deadline 4 in Appendix B of **Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**.
4.7	In relation to ISH2 Action Point 44 – Cumulative Assessment If the whole of the approved DCO approvals of EA1N and EA2 are built, they will be cumulative schemes for Sea Link. Another way to measure the effects of the Friston sub-stations is to refer to the ExA's assessment of its overall effects and add those to the effects solely of the Saxmundham site without the NGET substation at Friston.	This point is similar to point 4.5 above. The Applicant does not accept this view. The Friston Substation and associated alteration to pylons that forms part of the Suffolk Onshore Scheme is also part of the EA1N and EA2 schemes. Although both schemes assess the construction and operation of Friston substation and its associated alteration to pylons, so that both schemes would have permission to build it, only one Friston substation and associated alteration to pylons will be constructed, either by EA1N and EA2 or by Sea link. The correct approach to cumulative assessment of the two schemes is not therefore to simply add together the total effects of both projects and come up with an overall effect. It is the Applicant's view that if the whole of the approved EA1N and EA2 Schemes are built this built out scheme would be viewed as future baseline for heritage assessment and the effects of the Suffolk Onshore Scheme would be assessed as any effects arising from the Suffolk Onshore Scheme that would arise with the EA1N/EA2 schemes already in place. This scenario was what was assessed in the cultural heritage assessments provided in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109].** This found that in relation to assets in Friston there would be no further effects arising from the Suffolk Onshore Scheme to assets in Friston and all assets in Friston were scoped out of full assessment in the ES Chapter. A second scenario has since been assessed in response to ISH2 Action Point 53 and this was presented in Appendix B of **Application Document Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**. This assessed the presence of Friston substation and associated alteration to pylons as though it was constructed for the Suffolk Onshore Scheme in the absence of the other elements of the larger EA1N/EA2 schemes being built. This identified impacts to assets in Friston as a result of this scenario. In carrying out this assessment, however, supporting text in **Application Document Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]** noted that these identified effects would not happen in relation to the Suffolk Onshore Scheme if the larger EAN1 and EA2 schemes are built out. This is due to their shared footprint and the infrastructure required for the Suffolk Onshore Scheme forming a part of these larger developments. The effects arising on heritage assets from the EAN1 and EA2 schemes in isolation would therefore be the only effects that would occur. Therefore, no cumulative effects are identified in relation to Suffolk Onshore Scheme and EAN1/EA2 Schemes under either assessment scenario.

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4.8	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse Hurts Hall is a key feature in the landscape setting of the Fromus Valley. The valley has a long northward orientation with the Fromus running down the centre. Hurts Hall is a focal point in the views northwards and has heritage Group Value with St. John's whose tower is a visible landmark in gaps in the mature woodland to the north east. The B1121 is an historic road running parallel to the river into the southern edge of Saxmundham which retains its historic character and is part of the conservation area. This is an unspoilt historic approach of high quality which is rare	The Applicant is in broad agreement with most points made in this description and these aspects of the setting of the Grade II listed Hurts Hall (NHLE: 1268178), Saxmundham Conservation Area and the Grade II* listed Church of St John the Baptist (NHLE: 1268184) have been taken into account in the assessment of the impacts of the Suffolk Onshore Scheme upon these assets in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** and in **Application Document 9.44 St John's Church Grade II* Listed Building Assessment [REP1-118].** One point of disagreement is the assertion that the approach is unspoilt. This is a subjective term and depends on what point in history is taken as the 'pristine' against which any spoiling would be measured. There are no landscapes in Britain that are unchanged by human hands and the historic development of Hurts Hall and its parkland setting throughout the 17th, 19th, 20th and into the 21st century is a prime example of that. The parkland is not a designated heritage asset as it is not of sufficient special interest, rarity and historic integrity to warrant a national designation, being too far changed by the acknowledged field boundary loss, intensive farming, presence of the cricket bat plantation, and the loss of designed tree stands. One of the most distinct changes is the transformation from the landscape of small fields dominated by pastoral activities, to the large open fields used for arable which is a result of 21st century boundary removal. The views of the remnant parkland are acknowledged as attractive, and making a positive contribution to the assets mentioned, but unspoilt is not a valid descriptor.
4.9	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse The quality of Hurts Hall's architectural form, strength of its detailing and colours retain the eye. The change from the historic landscape shown in the old mapping has preserved the landscape qualities of the valley and added its own layers of interest.	Whilst it is true that some change can add interest and time depth to a landscape, it is not clear from this statement which features are believed to add layers of interest in this location. The changes seen in the parkland setting of Hurts Hall, noted in the response to paragraph 4.8 above, are assessed by the Applicant as predominantly detracting from the significance of the parkland setting of the Hall.
4.10	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse The sides of the valley frame the view, with trees on the eastern crest partly framing the contours – the Converter station will be visible in the gap, especially at night	The assessment of the impact of the Suffolk Onshore Scheme presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** acknowledges that the Converter Station will be visible in views towards Hurts Hall. A night-time assessment has been prepared in response to Action Point 51 from ISH2 as **Application Document 9.124 Supplementary Nighttime Assessment** submitted at Deadline 5. This details the proposed operational external lighting at Saxmundham Converter Station and mitigation measures taken to minimise the effects of operational lighting on sky glow and light spill. Viewpoint 2 in the Supplementary Nighttime Assessment relates to Hurts Hall, Saxmundham Conservation Area and the Church of St John the Baptist. It articulates the likely effects of operational lighting required in the winter months and for maintenance activities, but concludes that this would not detract from the lighting associated with St John's Church, as it would be within a different part of the view and separated by existing light sources, including lighting at Hurts Hall and bright lighting columns within a car park on the southern edge of Saxmundham. The assessment also notes that the scenic qualities of the parkland at Hurts Hall are less visible at night and therefore less sensitive to change. In this regard the impact of the Converter Station is not considered to be any more impactful at night than it would be during daylight with regards to the setting and heritage value of Hurts Hall.

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4.11	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse The proposed bridge will have a Direct Effect on its setting. The existing B1121 is lined with hedges parallel to the valley and river. This will be broken on the eastern side to create the long turning curve needed for the large transformer vehicles. This will break the continuous visual link of the old road into Saxmundham with its landscape setting	The impact of the necessary removal of hedged boundary planting to the roadside in relation to the permanent access has been considered in the assessment of the impact of the Suffolk Onshore Scheme presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. It should also be noted that the degree of existing boundary planting to the roadside varies along its length and the breaks in planting afford glimpsed views towards Hurts Hall and the Church of the St John the Baptist on approach to Saxmundham.
4.12	In relation to ISH2 Agenda Item 11.4 – Setting of Hurts Hall and Hill Farmhouse The new road will need a long embankment up the high bridge and the proposed planting either side will cut perpendicularly across the principal axis of the valley. The traffic moving on this permanent road and only access to the site will exacerbate the harm of the new road and bridge through the valley. This road will also be the access to the Lion Link site for construction and maintenance in operation.	The impact of the presence of the permanent access has been considered in the assessment of the impact of the Suffolk Onshore Scheme presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. It is noted however that the precedent of east-west aligned features within the landscape that cut across the principal axis of the valley is well established in the form of historic field boundaries that are shown on 19th century mapping within the parkland associated with Hurts Hall and forming part of its design and operation. The loss of these features is considered to be a degradation of the historic character and integrity of the park and so the introduction of the permanent access, with its associated boundary planting, is not seen as an entirely alien feature. Once the planting to either side of the access track has matured, it will have an appearance akin to a field boundary, particularly in views from within the garden of Hurts Hall, as demonstrated in **Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]** Viewpoint CH 2B Operation Year 15 photomontages.
4.13	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse The permanent access will then rise at a moderate gradient for the heavily loaded trailers up the eastern side of the Fromus Valley to the ridge going through a gap in Bloomfield's Covert. The existing break adds skyline interest and scale to the woodland as seen across the valley. Mitigation planting on the ridge would remove this aspect and would have to cover the whole of the eastern side to hide the road.	There is no intention to hide the road through the use of mitigation planting at the point where it enters through the existing gap in planting between Bloomfield's Covert and Colts Close. The existing gap between Bloomfield's Covert and Colts Close is shown on 19th century maps and will not be infilled with planting retaining this element of the historic parkland design. Further planting is proposed to the east of Colts Close up to Wood Farm, which is to the north of Bloomfield's Covert. This planting will bolster the existing Colts Close and provide some screening of the Converter Station, east of Hurt's Hall parkland, but it is not intended to infill the gap. This is shown on **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [REP4-065]**. The impact of the presence of the permanent access has been considered in the assessment of the impact of the Suffolk Onshore Scheme presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**.
4.14	In relation to ISH2 Agenda Iten 11.4 – Setting of Hurts Hall and Hill Farmhouse The effects of this proposal will harm the historic and architectural setting of Hurts Hall as well the highest quality entrance into Saxmundham	The impact of the Suffolk Onshore Scheme on Hurts Hall and Saxmundham Conservation Area is presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**.In both cases the Applicant's view is that the presence of the Suffolk Onshore Scheme within their settings will result in less than substantial harm at the lower end of the scale.
5 Cumulative Impacts Agenda Item 20 – Action Points AP107 – AP112		

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AP107	5.1. Even with the lack of sufficient information on Sea Link and LionLink, the EA1N and EA2 ExA observed that the effects of the cumulative delivery of its proposed development with the other East Anglian development on the transmission connection site at Friston are so substantially adverse that the utmost care will be required in the consideration of any amendments or additions [28.4.5] 5.2. This was the conclusion without having all the facts we now have before us. It is the baseline for assessing the cumulative impact. Adding Sea Link's harm to Friston tips the balance against Sea Link.	The Applicant has taken great care to ensure that the effects relating to the connection at Friston do not exacerbate the effects of EA1N and EA2 alone. The Applicant strongly disagrees that adding Sea Link's proposals at Friston to those of EA1N and EA2 "tips the balance against Sea Link".
AP111	The origins of the Sea Link DCO 5.3. The origin of the harm to landscape, visual and heritage at Friston was initiated by ignoring the strategic options of using the capacity available in the permitted Bawdsey to Bramford underground ducts. Their use should have been the first option for EA1N and EA2, using the cheaper and electrically more efficient use of HVDC cables rather than HVAC. SPR, National Grid, the ExA and SoS all did not begin with this first and obvious option as part of a comprehensive strategy. 5.4 The multiple DCO applications and no statement of a future strategy, starting with EA1's downgrading to Bramford, is evidence of the absence of proper planning and good design. Level of detail in current submissions 5.5. The Applicant has submitted cumulative visualisations: [REP4-086] EN020026-002619-9.90 Applicant Response to January Hearing Action Points. There has been no change in the quality of visualisation from the simple block models originally submitted. No other details are included such as new landscaping, electrical equipment and wirescapes. The images will allow only the most basic assessment of effects. Given the huge scale and change to the character of the landscape and countryside, this is an inadequate method to assess cumulative effects. The baseline of Landscape, Visual and Heritage receptors 5.6. The EA1N and EA2 ExA concluded the overall harm was on a knife edge in the planning balance. Adding Sea Link's acknowledged harm to the Friston baseline is the basis for recommending refusal. [Table 1 not reproduced] Visual Impact Assessment - Policy 5.7. In my responses to ExQ1 – 1LVIA2 [REP3-132] I drew attention to the Applicant's commissioning of the 2014 Visual Impact Provision report by Gillespies and Land Use Consultants on using funds to reduce the visual impact of existing electricity transmission lines in Areas of Outstanding Natural Beauty and National Parks. This document is almost invisible online so I attach it for the document records. It is relevant to the potential mitigation of existing landscape and visual harm from the pylons from Sizewell thought the AONB which could affect the planning balance positively.	5.3-5.4 The point of connection for customers like windfarms and interconnectors is not a matter for the Applicant to decide; it is for a matter for the National Energy System Operator (NESO) to decide. 5.5 The cumulative visualisations in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)** [**REP4-086**] and updated at Deadline 5 show the illustrative converter station model (used in used in **Application Document 9.14 Suffolk and Kent Illustrative Visualisations [REP1-296])** sat within the maximum parameters applied for (in terms of footprint and height) which represented the Rochdale Envelope, shown as a blue dashed line. NGET Friston substation (Kiln Lane) reflects the maximum parameters and Limits of Deviation (LoD) for Friston Scenario 2. These are shown as a block photomontage with two new pylons and the removal of one pylon under Friston Scenario 2, as shown in **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Parts 1-7 (APP-208 to APP-214**]. The 3D model used in the **Application Document 9.6.1 Appendix A: Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston [AS-062]** has not been used here as LionLink do not currently have a 3D model available reflecting the amendments at Kiln Lane substation. 5.6 The Applicant has not "acknowledged harm to the Friston baseline"; the effects are no different to those of EA1N and EA2 alone, other than the Sea Link HVAC underground cables entering the substation. 5.7-5.14 The Applicant's response to Visual Impact Provision (VIP) is provided in Table 1.2 below (1LVIA2).

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	5.8. This is relevant to the Sea Link DCO as it identified that two stages 4ZW.1 and 4ZX.1 of the 400kV pylons west from Sizewell through the Suffolk and Essex Coast and Heaths AONB (S&EC&H) to Gromford harmed its visual qualities within and adjacent, and particularly for the users of the AONB's amenity. NGET has for 20 years had a fund agreed with OFGEM available to mitigate harm from existing overhead lines only. Between April 2021 to March 2026 this has amounted to £465m in 2018-19 prices within the RIIO-T2 price control (RIIO is Revenue = Incentives + Innovation + Outputs). 5.9. The Applicant's own latest policy is the version of its Visual Impact Provision which was approved by OFGEM in August 2023. Only the March 2021 version is available online: https://www.nationalgrid.com/document/562886/download 5.10. The 2021 version notes the potential candidate areas have been identified, assessed for impacts with options for mitigation and final selection. The Guiding Principles are given and the Stakeholder Advisory Group (SAG) set up. Engagement seeking the views of other stakeholders such as landowners and local planning authorities is also promised through NGET's Landscape Enhancement Initiative (LEI). It is unfortunate that many of the detailed reports referred to by OFGEM and even NGET are not available online – in particular neither NGET's own methodology, nor its policy for the LEI . https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/visual-impact-provision In February 2021 during the Covid-19 epidemic, OFGEM set out its Final Determination for the company allowances under the RIIO-2 price control, commencing 1 April 2021. This include a budget of £465m for VIP. It noted (para. 2.142) that as "the cost of the visual amenity projects are paid for by consumers" it had not agreed to the requests for a greater budget. I conclude this gives greater weight to the preferences of local stakeholders for mitigation of existing harm to landscape and visual amenity, and any proposals for worsening the baseline conditions. The 2014 Gillespies-LUC report found the worst affected receptors were local people, visitors and tourists. The socio-economic effects of increasing landscape and visual harm without mitigating existing harm have yet to be assessed in this DCO application. 5.12. In November 2023 OFGEM set out its views on NGET's revised Visual Impact Provision policy 2023. It fulfilled its purpose and included the required elements set out in NGET's licence. It supported National Grid implementing the policy and did not propose any changes. The Minutes of the VIP SAG contain no reference to discussions or funding for the S&ES&H AONB. Visual Impact Assessment – Application to S&EC&H AONB 5.13. The SeaLink Landscape and Visual Assessment does not mention the Applicant's 2014 Report on the harm caused by the Sizewell-Gromford section of pylons. It has not used the NGET Visual Impact Policy as any guide to its own assessment of the existing harm in the Landscape and Visual baseline, not to the acknowledged need for its mitigation and the potential funds available. 5.14. There is no evidence in the Applicant's design that the existing harm has influenced either the siting or the overall design of the Proposed Project. National Grid documents not available online on 15/02/2026	

Paragraph No or AP No	Point Raised	Applicant's Response
	5.15. Sources and footnotes referenced in NGET's Visual Impact provision, March 2021: https://www.nationalgrid.com/uk/electricity-transmission/network-and-infrastructure/visual-impact-provision Consistent error message found: 404 page: "Apologies, the page you are looking for does not exist or is temporarily unavailable." Source: National Grid – Visual Impact Provision, March 2021, 2022 revision 5.16. Footnote 7: The Landscape and Visual Impact Assessment Methodology is based on the framework set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA) (3rd Edition) (2013) published by Routledge on behalf of the Landscape Institute and the Institute of Environmental Management and Assessment. A copy of our methodology can be found on our VIP website https://www.nationalgrid.com/uk/electricity-transmission/document/84136/download National Grid – Visual Impact Provision - Stakeholder Engagement Principles 5.17. Footnote 9: https://www.nationalgrid.com/uk/electricity-transmission/document/81026/download Footnote 19: The Landscape and Visual Impact Technical Report (October 2014) assesses the landscape and visual impact of existing electricity transmission infrastructure in nationally protected landscapes in England and Wales. The report was written by acting as Independent Adviser to National Grid on the VIP project [Gillespies and Land Use Consultants] https://www.nationalgrid.com/uk/electricity-transmission/document/84141/download	

3. Response to Nicholas Bridges Responses to ExQ1 [REP3-132]

Table 3.1 Applicant's Response to Nicholas Bridges Responses to ExQ1 [REP3-132]

ExQ1	Point Raised	Applicant's Response
ExQ1 Landscape and Visual		
1LVIA2	**Good design** 3. The narrowness of the ES's Area of Search has constrained good design. NGET's proposed mitigation is also inadequate. National Grid have a very different ambition compared to the 2014 report Visual Impact Provision (VIP) it commissioned from Gillespies /Land Use Consultants to identify which parts of the England and Wales's electricity transmission infrastructure were causing harm to designated landscapes, where mitigation of landscape and visual harm was most needed, and would be most effective. £500m was set aside at the time for the whole of the UK for this mitigation which has recently been increased by £200m. 4. The VIP focus was on transmission lines including other infrastructure such as substations and sealing end compounds where appropriate [1.9]. Lines outside but in reasonable proximity to designated landscapes were considered. The purpose of the VIP Report was to provide evidence to inform the stakeholder advisory group. The VIP's findings were as follows. 5. The assessment methodology was based on GLVIA3. The common steps were: □ Defining an appropriate study area; □ Identifying aspects affected by the transmission line; □ Identify, list and describe the impacts; □ Assess the importance of each impact; □ Compare the levels of importance of each section of the line. 6. The main impacts on landscape and visual amenity were within 5km of the transmission line, and the most important ones often within 2km. The Tables below show the assessment scores of the SC&H AONB. (*Note, table and map not reproduced here*) "Jointly judged to have combined landscape and visual impacts of moderate importance, albeit with individual impacts which are of high importance. High importance visual impacts have been identified affecting users of regional trails and cycleways in the AONB." Summary of the VIP mitigation options for S&EC&H AONB: 8. The reinforcement of existing woodlands and hedgerows could help to further screen views of the pylons, in particular providing appropriate mitigation for some viewpoints in close proximity to the lines. However, due to the flat nature of the landscape, it is likely that the tops of pylons would still be visible when the lines are viewed over a longer distance. Such planting and reinforcement might be achieved as part of wider landscape enhancements for those areas adversely	3 - 9. The study area for the Landscape and Visual Impact Assessment was set out at scoping stage and within the Preliminary Environmental Information Report (PEIR) and has been subsequently agreed with East Suffolk Council and Suffolk County Council (refer to **Application Document 9.15 Draft Statement of Common Ground Between National Grid Electricity Transmission and the East Suffolk Council [REP3-058]** and **Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062]**). As noted in Section 1.5 of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** the agreed study area defines the area within which it is judged that potentially significant landscape or visual effects could occur, rather than the area from which the Suffolk Onshore Scheme would be visible. The study area is proportionate, appropriate and endorsed by the Suffolk Authorities and the Applicant strongly disagrees that the narrowness of the ES's Area of Search has constrained good design. The Visual Impact Provision (VIP) National Grid commissioned document produced by Gillespies, LUC and Professor Carys Swanwick, was to develop a consistent evidence-based methodology to compare the effects of electricity infrastructure across nationally designated landscapes. The outcome of which was a shortlist of twelve sections of overhead line (OHL) identified as having the most significant landscape and visual impacts within designated landscapes, with four priority sections taken forward for more detailed assessment. The existing OHL in the SECHNL was not one of the four selected priority projects, however, the SECH National Landscape Partnership has secured funding for projects through the associated grant scheme, the Landscape Enhancement Initiative. Irrespective of this, VIP is not of relevance to the Proposed Project. The purpose of VIP is to mitigate the visual impact of existing electricity infrastructure in nationally designated landscapes using funding available from Ofgem. VIP does not apply to the construction of new transmission lines and other new transmission infrastructure. The Applicant is not required to assess or provide mitigation for existing infrastructure within the landscape such as the existing OHL as part of the Proposed Project. The Suffolk Onshore Scheme has specifically avoided siting infrastructure in or within the setting of the SECHNL. The connection of the existing OHL at Kiln Lane substation under Friston Scenario 2 (outside the SECHNL) comprises landscape mitigation which includes the provision of extensive belts of woodland and hedgerow planting. 10 - 11. The use of a parameter-based approach is standard practice when undertaking Environmental Impact Assessment of DCO projects. It allows for a worst case assessment prior to the detailed design being undertaken and the design approach being finalised in line with the detailed design. The magnitude of effects would only ever be the same or lower based on this approach; never higher.

ExQ1	Point Raised	Applicant's Response
	affected by transmission lines that are in line with objectives in the AONB Management Plan. 9. The VIP records a high ranking of the S&EC&H NL for its visual score. The section of transmission lines most in need of mitigation is that from Sizewell Power Station through the NL, then outside where Friston has consent to join them, and south west to Gromford. The importance identified in the VIP report for mitigating the existing effects of the pylons has not been assessed by the Applicant, nor have the Proposed Project's own mitigation measures been allied with National Grid's own. 10. Paras. 5.4.18 to 5.4.26 are an example of the Applicant's use of the Rochdale Envelope principles to postpone design decisions. The Applicant has not explained why and how it is not possible to specify and submit far more details of the Proposed Project. For the ES to be the most accurate, it needs sufficient design parameters applicable to the characteristics of the Proposed Project. These should be used in the assessment and those parameters likely to result in the maximum or medium adverse effects be identified. 11. My RR Topic E – The use of the Rochdale Envelope drew attention to the information void by its unnecessary application to limit the character and appearance of the submitted design of the converter and substation sheds when the Applicant has explored and submitted so many options for co-location of converter stations in EN020026-000203-7.10 Coordination Document and form, colour and materials in EN020026-001621-7.11.1 Design Approach Document - Suffolk (Version B Tracked Changes). It is possible for the DCO Order to allow some variation of the precise location or height following construction detailing. But not the fundamental volumes, locations and appearance in the landscape. 12. It is inexplicable why the images in EN020026-000714-9.6.1 Appendix A Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston have modelled the plant with wirescape outside the converter sheds but this has not been done in the LVIA's images. The extensive wirescape around the plant on the ground, as illustrated typically in its Viewpoint 6(a), is bound to have harmful effects on landscape and visual receptors. 13. The Applicant states in para. 5.4.30 that the design parameters are explained in Application Document EN020026-000230-6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project. The Descriptions in section 4.2 Suffolk begin with descriptions of the infrastructure's components with dimensional and technical information. Saxmundham's converter station is from paras. 4.2.31 to 4.2.35. It shows the indicative view in Plate 4.1 below, which is based on the application plan below that. (*Note, plates not reproduced here*) 14. It is explained in para. 4.2.3 that the architectural design may vary within the physical parameters and Limits of Deviations. Design principles have been developed and submitted in section 3.3 Application Document 7.12.1 Design Principles – Suffolk at Table 3.1. This identifies a series of design issues in column 1 with the Key Design Principles within them in column 2. The issues are standard points that all architects consider when designing new buildings. The Principles are more detailed aspirations and approaches which could be adopted in a design. 15. However, 7.11.1 Design Approach Document – Suffolk Version B illustrates studies of most of these topics. The breadth of the options and images is a	The Applicant disagrees that 'fundamental volumes, locations and appearance' are not fixed. The limits of deviation for the converter station and substation (Friston Scenario 2) in the Suffolk Onshore Scheme are actually very limited, allowing for only very minor movements within the site. The maximum height parameters are fixed in the draft DCO for all key elements of the Proposed Project. The appearance of most aspects of both the converter station and substation under Friston Scenario 2 are fixed because they comprise equipment such as gantries that have no or very limited flexibility in appearance. There is flexibility in appearance on matters such as the colour of the panels of the buildings and these details are subject to Requirement 3 in the draft DCO. 12. The visualisations presented in **Application Document 9.6.1 Appendix A cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston [AS-062]** show the external electrical infrastructure because these substations are at a detailed stage of their design in which a 3D model was available to use in the visualisations. The Application visualisations show the maximum parameters for the Saxmundham Converter Station because it is not at the same stage of design. Illustrative visualisations have been submitted during the Examination in **Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2** [**REP1-296**] which demonstrate the difference between the maximum parameters applied for (in terms of footprint and height) which represented the Rochdale Envelope, and a typical and more realistic design solution, based on the generic converter station massing provided in **Application Document 2.13 Design and Layot Plans [APP-037]**. 13 – 16. The Applicant strongly disagrees that '*the use of the Rochdale Envelope…would permit an uncontrolled architectural design*'. Requirement 6 of the draft DCO contains a very large number of management plans to be approved by the relevant planning authorities, including notably the Landscape and Ecological Management Plans and Drainage Management Plans. Requirement 3 also provides design approval for elements of the project where design is flexible, as well as requiring compliance with the Key Design Principles, which were developed through extensive engagement, including with local authorities and the design panel. As explained above, the illustrative visualisations **Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2** [**REP1-296**] show a typical more realistic design solution in which the combination of built form and external electrical infrastructure is shown. The Applicant disagrees that there is extensive wirescape around the plant on the ground. As shown in **Application Document 2.13 Design and Layout Plans** [**APP-037]** the site is typically divided up into sections which include the tallest DC Hall, Valve Hall and Reactor Hall buildings, the lower height service and spare parts buildings and an area for the external electrical infrastructure. This area is a contained area within the site and of lower height compared with the adjacent DC Hall, Valve Hall and Reactor Hall. The LVIA considers a worst-case approach to the assessment which is based on the Rochdale Envelope maximum parameters. As expressed by the illustrative visualisations **Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2** [**REP1-296**] compared with the Rochdale Envelope block visualisations, this is very clearly a worst-case approach that has been adopted and has been fully assessed within the Applicant's Landscape and Visual Impact Assessment. The assessment of worst-case parameters is a standard approach in Environmental Impact Assessment for DCO projects.

ExQ1	Point Raised	Applicant's Response
	competent study. With such design development, it is inexplicable why, having received the Design Review Panel's feedback, the Applicant cannot make a decision and commit to a particular design concept. The Rochdale Envelope could still be applied if any minor changes in a variety of topics become necessary. As currently proposed, the use of the Rochdale Envelope to include the submitted design in a DCO would permit an uncontrolled architectural design which would cause unnecessary harm to the landscape and settings of heritage assets. 16. It is also inexplicable why some images have modelled the plant and wirescape outside the converter sheds but this has not been done in the LVIA's images. The extensive wirescape around the plant on the ground is bound to have harmful effects on landscape and visual receptors.	
1LVIA4	**Lighting** I support the ExA's request for further design and assessment of the proposed project affecting receptors from operational light pollution at night in the dark countryside. This is a major omission from the LVIA. The impact of the floodlighting at Felixstowe docks is widespread and very noticeable contrast because East Suffolk has such dark skies. This sets a high standard for keeping any light pollution in this application's sites to the absolute minimum, if at all.	Refer to Applicant's response to 1LVIA4 which provided additional information on external operational lighting for the Proposed Project (**Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]**). The Applicant has also provided a nighttime assessment within **Application Document 9.124 Landscape and Visual Nighttime Assessment** submitted at Deadline 5. It is important to note that external operational lighting at the Saxmundham Converter Station site would not comprise floodlighting and so is not at all comparable to the lighting required at an operational port.
1LVIA7	**National Landscape (NL) duty** See response also in 1LVIA9 which shows the indicators in the Tables not being properly addressed.	Refer to the Applicant's response below.
1LVIA9	Effects of construction on defined features of the NL 18. The key characteristics of the Landscape and Cultural History ES topics should not be assessed solely on intervisibilty or proximity of the Proposed Project with the cumulative developments. The LDA Design report on the "Natural Beauty and Special Qualities Indicators" of the SC&H AONB (v1.8, 21 November 2016) followed Natural England's guidance for assessing Landscapes for designation. The following are specifically relevant to the two ES topics. □ Within the factor Cultural Heritage are indicators built assets such as military structures (e.g. MartelloTowers…). Their presence make a particular contribution to a distinctive sense of place and other aspects of scenic quality. □ Within the factor Historic influence on the landscape, there is the visible presence of specific landscape elements or features that provide evidence of time depth or historic influence on the landscape (e.g. early mediaeval churches, Martello Towers, Snape Maltings…) □ Within the factor Association of the landscape with people, places or events is evidence that the landscape has associations with notable people or events, cultural traditions or beliefs (e.g. the arrival of St. Botulph and the founding of his monastery at Iken…) Special Beauty Indicators 19. The Special Qualities Indicators include further factors :	18 – 22. The landscape and visual cumulative assessment on the SECHNL does not solely consider intervisibility or proximity of the Proposed Project with the cumulative developments. Whilst that is a consideration, the cumulative assessment assesses how the addition of the Suffolk Onshore Scheme when combined with the construction of the cumulative developments has the potential to affect the various Natural Beauty Indicators and their subfactors. A cumulative effect on an Indicator could result without intervisibility between the Suffolk Onshore Scheme and another cumulative development. This is clearly set out in Table 4.1 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** and in **Application Document 9.123 Appendix A Cumulative Assessment of Natural Beauty and Special Qualities Sub-Factor Indicators** submitted at Deadline 5. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** fully assesses the inter-project cumulative effects on the SECHNL at construction, operation and maintenance. 18. As noted in the response on Landscape and Visual cumulative assessment above, the cumulative assessment of effects to heritage assets also does not rely solely on intervisibility or proximity of the Proposed Project with the other developments. Whilst that is a consideration, the assessment of the potential impacts of a scheme/(s) through change to the setting of heritage assets is more complex and includes historic associations, context, visual change and a range of other factor as outlined in Historic England's Good Practice Advice Note 3 (Historic England, 2017). All of these aspects of setting are considered in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and its supporting technical appendix **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** and in the detailed cumulative effects assessment provided in response to ISH2

ExQ1	Point Raised	Applicant's Response
	Within the factor Health and Well being, access along defined routes for walking and cycling are extensive rights of way networks… offering access to key landscape types (such as coast, Sandlings heath, forest, wetlands and estuaries) Within the factor Opportunities for active and passive recreation are indicators on the coast, offshore and inland including rambling, boating, bird-watching and fishing at sea and in the estuaries and rivers (e.g. the public footpaths that wind around the edges of the Alde estuary). 20.The Applicant's consideration of its duty under Section 85(A1) (s85) of the Countryside and Rights of Way Act 2000 (CRoW Act) is in Application Document EN020026-001438-9.47 National Landscape Section 85 Duty Technical Note. It used the LDA Design 2016 report noted above to inform the baseline for the AONB. This was assessed in the 6 documents cited in para. 1.2.4 of the above 9.74. Its section 3 states the Approach to s85 Duty. Natural Beauty and Special Qualities Indicators are in section 3.4. Information has been gathered from documents APP-096, APP-097 and APP-057 into Tables 3.2 and 3.4. 21. Table 3.2 covers Natural Beauty Indicators but mislabels the Factors as Indicators. Extracts of the Indicators for each of the 6 Factors are in the second column with the Effects arising from the Proposed Project in the third column. Any relevance to acid grassland enhancement is in the last (fourth) column. Table 3.3 covers the Special Qualities Indicators in the same format. 22. There are no assessments nor sources given as the basis for the effects arising and the levels of significance during construction, operation and maintenance. I have checked the Landscape Baseline which consistently notes the outstanding nature conservation value and layers of historical activity across the Alde estuary. Nevertheless para 2.1.11 states: SCLCA LCAs B5 and J4 and SCASNE SCT 01 are scoped out for construction, operation, maintenance and decommissioning due to a lack of inter-visibility with the Suffolk Onshore Scheme such that effects on the setting or perceptual qualities of these LCAs and SCT would be limited with no significant residual effect. 23. No evidence was cited for how there would be a lack of inter-visibility. Either the ZTV study did extend to the whole of the south side of the Alde estuary and it has been hidden, or the assessor was not aware of it and used a summary judgement with no evidential basis. (EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7 includes 5 ZTV plans illustrating the visibility of individual Project and in combination.) Para. 2.1.9 of 9.47 states that the Proposed Project was not assessed against District Seascape Character designations of the Suffolk Coastal LCA and the Coastal Character Areas. The exclusion of the Alde estuary did not consider the effects on it from floodlights glowing in the night sky even if partly or completely obscured by intervening vegetation nor visibilty in the winter without foliage. 24.There is no mention anywhere in this document of the setting of the AONB and any affects from the Proposed Project and the three Cumulative projects assessed. As the most extensive and highest above ground development will be outside the AONB but visible from inside it, this is a very serious omission in the EIA process.	**Application Document Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**. 23. The Applicant has provided a detailed response as to why the Alde estuary is not part of the Landscape and Visual Impact Assessment study area. The Applicant's response is contained in **Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2** [**REP4-094**]. As noted above in the Applicant's response to 1LVIA4, external operational lighting at the Saxmundham Converter Station site would not comprise floodlighting and so is not at all comparable to the lighting required at an operational port. 24. The effects on the setting of the SECHNL have been fully considered by the Applicant and reference should be made to **Application Document 9.123 Applicant's Response to Second Written Questions** submitted at Deadline 5, which provides a clear summary of the effects of the Suffolk Onshore Scheme on the setting of the SECHNL. 25. No response required. 26 – 28. The reason for not including NGV's Nautilus project in the inter-cumulative assessment is fully explained in paragraphs 13.2.7 – 13.2.9 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore scheme Inter-Project Cumulative Effects [APP-060**]. In the absence of Nautilus, there is no 'third project' to assess and the plans submitted by the LionLink project during statutory consultation appear to leave little space for a third project to be co-located at the site.

ExQ1	Point Raised	Applicant's Response
	25. The character and appearance of the landscape overall and the collective character from the age and architecture of historic buildings within settlements and landscapes are critical. 26. The value of the S&SC&H National Landscape lies in its rurality, sandlings vegetation interspersed with tidal rivers and the seashore. This part of Suffolk is fundamentally rural with market towns, villages, churches and patterns of fields and woodland bearing witness to centuries of inhabitation and working of the land. The only large scale industrial character is found at Sizewell Power Station and the major towns like Ipswich, Lowestoft and Felixstowe. The cumulative effect of the consented substation at Friston, this Proposed Project with clear plans for two more converter stations, the Helios solar farm and other schemes identified in the above document will combine to change the character of the countryside for ever over an area far wider than the intense industrialisation of this application site. 27. The third converter station site at Saxmundham (for LionLink) is not assessed for cumulative Impacts and its site has been cut out of the red line site boundary. The xx illustrates a replica of the two Sea Link converter station designs. With so much detail already in the hands of NGET and its design team, there is nothing preventing the third station being assessed in detail. 28. If the third CS is not assessed in this DCO, then its effects should not be assessed in isolation, but rather together with Sea Link in combination with it. The harm to the landscape and cultural heritage acknowledged by this applicant should be included within the proposed project as it would be invidious for the environment created by Sea Link to be a very low quality baseline for Lion Link and a travesty of the the whole purposes of Environmental Assessment.	
1LVIA11	**Heritage Coast** Heritage Coast (See also response to 1CH3 – Settings' Intervisibility) 29. The very limited assessment of effects on the Heritage Coast and an explanation on how the summary has been arrived at is also relevant to the historic interest of St. Botulph's church at Iken and its setting in the Alde estuary. The Martello Tower is the culmination of the Board of Ordnance's defensive line up the East Coast built during the Napoleonic Wars. 30. Note policy EN-1, Para 5.10.10 : Heritage Coasts are defined areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors. Note that the policy covers not just the shoreline but also the area inland from it. Para 5.10.11: Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area. 31. The plan extracted below shows that the area of the Heritage Coast extends over the whole of the Alde Estuary. This is another policy reason for assessing visibility and setting of St Botolph's church, the public footpaths around the southern edge of the estuary, and Martello Tower CC at Slaughden. The weight given when heritage is harmed	29 – 31. Refer to the Applicant's response to 1LVIA11 in **Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]** in which it sets out the objectives of the Heritage Coast. Heritage Coasts are defined and not designated and whilst their underlying characteristics contain cultural heritage features which contribute to the character and quality of the Heritage Coast, they are not defined or designated for their cultural heritage. The Applicant has provided a detailed response to the Relevant Representation [**RR-0091**] by the Alde and Ore Association and explained why the Alde estuary is not part of the Landscape and Visual Impact Assessment study area. The Applicant's response is contained in **Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2** [**REP4-094**]. Furthermore, the Applicant confirmed in response to AP47 in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)** [**REP4-086**] that there is no permanent infrastructure sited within the Heritage Coast or its setting. The only effects are associated with the construction of the landfall and HVDC cable corridor, which along with their reinstatement would result in short term, temporary and minor adverse, not significant effects. The Applicant therefore considers that the temporary nature of the Proposed Project's interface with the Heritage Coast is compatible with the special character. 32 – 33. With respect to effects on the heritage assets including St Botolph's church and the Martello Tower CC at Slaughden refer to Cultural Heritage, point 4.4 in Table 1.1 above. The heritage assessment on the setting of both the assets concludes that there would be neutral effects. These findings are consistent with those of Historic England presented in **Application Document Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 [REP4-122]** which identified that they have no

ExQ1	Point Raised	Applicant's Response
	32. Identifying heritage harm and what regard and weight it should be given in assessment and the planning balance was Ground 2 for SASEAS Judicial Review of the SoS's approval of the DCOs for EA1N and EA2. Lang J reviewed in her judgment [2022] EWHC 3177 (Admin), issued 13 December 2022, where the two different degrees of policy constraint – "great weight" or "must have regard to" – are applied to determining the severity of heritage harm. The various duties are found in Regulation 3 of the Decisions Regulations 2010 and the statutory regimes under the PLB&CA 1990 and the TCPA 1990, NPS EN-1 and EN-3 (both July 2011). She also drew upon case law [108 – 112]. 33. Lang J determined that the less onerous July 2011 EN-1 policy wording in force at the time should be applied. Its para 5.8.18 Stated that "… the IPC should weigh any negative impact against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits will be needed to justify approval." 34.9.34.1 B – Section 6: why do the Year 15 images use a summer baseline? A winter baseline would potentially reveal more of the proposed project and would be a more comprehensive assessment of effects. 35. The November 2023 version of EN-1 stated the equivalent at para. 5.36 with additional text at its para. 5.9.28: "…the Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification." Para. 5.9.36: "…the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval." 36. The December 2025 version of EN-1 states in its paras. 5.9.29 and 5.9.37 the same as in the 2023 version just superseded. Application of the 2023 wording would have been a more onerous test within the planning balance of EA1N and EA2. 37. As this Proposed Project includes the consented development at Friston, approved under the less stringent July 2011 policy EN-1, it will have to be reassessed this time against the different latest policy. From the ExA's conclusions on EN010077, it is clear that the assessment in the Sea Link DCO will be different. There is now the addition of Sea Link to the Friston project, and the cumulative schemes of LionLink, and others. It is important that the partial rather than complete assessment of all cumulative projects is not repeated. The ExA and SoS must be provided with a thorough ES to allow proper conclusions balancing heritage harm and benefit.	concerns regarding the two assets in question and do not see any capacity for impacts to these assets as a result of the Suffolk Onshore Scheme. 34. Winter and summer baseline photography has been captured from every representative viewpoint. The approach of using the winter photography at year 1 in the visualisations to demonstrate the worst-case scenario where mitigation would be young and not established and the existing deciduous vegetation not in leaf was agreed with Suffolk County Council and East Suffolk Council. The year 15 summer visualisations are used to show the best-case scenario with the mitigation planting established and seen within the landscape context of trees in leaf. Year 1 summer and Year 15 winter photomontages were not prepared. It is considered that the only difference would be that the leaves would either be in leaf or not and that the height of the mitigation planting would not be different, therefore not providing any additional material information. Furthermore, in **Application Document 6.2.2.1. Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** it notes that "*unless stated in the assessment text, it is assumed that there would be no difference in the magnitude of effect between winter and summer. For Year 15 winter, it is assumed that there would be the same height of mitigation planting as for summer and it would not be in leaf, so visualisations have not been prepared*." If there had been a difference between the effects of summer and winter in year 15, this would been stated. 35 – 37. Sea Link Friston Scenario 1 requires no additional infrastructure at the Kiln Lane substation (Friston) for the Sea Link project to connect into. The cumulative effects on landscape character and visual amenity have been fully assessed and consider the combined effects of EA1N, EA2, LionLink and Sea Link on the landscape character and visual amenity. Visualisations have been prepared to demonstrate the effects of Sea Link Friston Scenario 2 and LionLink on receptors at viewpoints 6a, 1 and 22 (**Application Document 9.108 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) Appendices** submitted at Deadline 5). Additionally of note is East Suffolk Council's view, with respect to matters of landscape character, expressed during the examination of the EA1N and EA2 projects, that "*There are unlikely to be any significant additional impacts on landscape character given that the extensions will be additions, to what will by then be, if consented, a substantial complex of industrial scale infrastructure*".
1LVIA12	**Visualisations** 38. My RR commented that the quality of visualisations in the LVIA are inadequate for the magnitude of effects and given the extensive detailed studies in the EN020026-001621 7.12.1 Design Principles Document- Suffolk Version B. The Applicant has submitted many supplementary images which still inexplicably	38. All the visualisations that have been submitted for the Application including those additional visualisations submitted during the Examination Process have been prepared in accordance with Visual Representation of Development Proposals Technical Guidance Note 06/19 (Landscape Institute, 2019). A detailed response has already been provided by the Applicant regarding 1LVIA12 which is provided in **Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]**. In addition, the Applicant has provided illustrative visualisations

ExQ1	Point Raised	Applicant's Response
	do not commit to a design which can be imaged properly – see also my response to 1LVIA2 above. □ DCO Document 9.6.1 Appendix A : Indicative cumulative visualisations of the NG and SPR substations near Friston. NGET's identification of the substations of EA1N and EA2 as cumulative development requires the baseline of all ES topics to exclude the Friston DCOs. The images were only AVR2 quality with no materiality and showed no mitigation. □ The submitted document of verified views of LionLink in DCO Document 9.6.3 Appendix C : Visualisations showing the indicative location of the LionLink converter station alongside the Sea Link converter station show none of its massing from the closest viewpoints but do in the most distant (VP 15). LionLink's position is known and its use, layout and buildings will be very similar to Sea Link's enabling it to be modelled in all cumulative images. □ The ExA requested [PD-005] an additional verified view within or very close to the northern boundary of the NL AONB. DCO Document 9.11.1 was submitted in September 2025. It only examined the NG and the eastern substations at Friston and one converter station at Saxmundham. An updated ZTV plan showed the visibility of the two substations separately and also combined. The image did not model the invisible massing in wireline which is standard practice. □ DCO Documents 9.48 River Fromus Visualisations Parts 1, 2, 3 [REP 1-298, 299, 300] were submitted to inform ongoing discussions with ESC and SCC. Three heights were modelled from 2 original and 3 additional Viewpoints. The Saxmundham converter station was only modelled as an AVR0 block without Lionlink at the same height, whether obscured or not.	(**Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 [REP1-296]**) which represent one of the design approach options under consideration as outlined in the **Application Document 7.12.1 (B) Design Principles – Suffolk [REP4-073**]. The Saxmundham Converter Station design is controlled by Requirement 3 of the draft DCO which requires the relevant planning authority to confirm that the layout, scale and external appearance are in general accordance with the Key Design Principles set out in Table 3.1 of **Application Document 7.12.1 (B) Design Principles – Suffolk** [**REP4-073]**. Flexibility in the converter station design so that the design can evolve in response to matters such as detailed ground investigations, drainage design, availability of equipment, progression of other projects, technological advancements and in response to locally approved matters such as landscape design is necessary and desirable for the progression of a well-designed project. The suggestion that the visualisations are of AVR2 quality is simply incorrect. Reference should be made to the Applicant's response to 1LVIA12 (**Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]**) which clearly demonstrates how the visualisations are scale verifiable and comply with the aims of Type 4 (photomontage/photowire/survey/scale verifiable) which represent scale, context, form and extent of the Proposed Project within the view. The Sea Link Environmental Statement and Landscape and Visual Assessment is very clear in that two separate scenarios have been assessed regarding the Kiln Lane (Friston) substation. Friston Scenario 1 assumes that SPR fully construct Kiln Lane substation, pursuant to the consented SPR DCOs before Sea Link commence their tie in and internal fit out works. Friston Scenario 2 assumes that Sea Link construct the Kiln Lane substation, pursuant to the Sea Link DCO, based on the Limits of Deviation and Order Limits. Cumulative visualisations of Sea Link and LionLink were provided at Deadline 4 **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)** [**REP4-086**] and have been further updated at Deadline 5 (**Application Document 9.108 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 – Appendices** submitted at Deadline 5) which reflect the updated outline landscape mitigation design for Friston Scenario 2. These cumulative visualisations show the illustrative model for both Sea Link and LionLink converter stations. There is no design information available to represent the extension at Kiln Lane substation for LionLink using a 3D model which is why those cumulative visualisations use a block model reflecting the maximum parameters.
ExQ1 Cultural Heritage		
1CH3	Paragraphs 39 – 54 introduce assets in the Alde Estuary, namely the Grade II listed St Botulph's Church and the Grade II* listed Martello Tower and provide an argument that these assets should have been included in the Cultural Heritage assessment stressing that intervisibility is not the only consideration in the assessment of impacts through change to setting.	See response to point 4.4 in Table 1.1 above.
ExQ1 Cumulative effects (inter-project)		

ExQ1	Point Raised	Applicant's Response
1CInter1	**1CEInter1.** **Coordinated consideration of network projects Cumulative effects (Inter-project) Friston Substation**: East Anglia One North (EA1N)- EN010077 East Anglia Two – E010078 Lion Link 55. Large unsubmitted cumulative schemes were known about at the time of the Friston DCO Inquiry into the two projects but were not included in their principal Cumulative Assessment. The arguments for and against the need for this were assessed in a Judicial Review by Lang J in her judgment on 13th December 2022 [EWHC 3177 (Admin)] in the case of SASES v. SoS, EA1N and EA2. 56. The ExA had requested an "Extension of National Grid Substation Appraisal" from the Applicants EA1N and EA2. This gave information about the likely environmental effects of extending the Proposed National Grid substation at Friston to accommodate the Nautilus and Eurolink projects. SASES claimed that neither the ExA nor the Applicants considered the Extension Appraisal in reaching their conclusions. 57. The ExA's reasoning for not considering the information was that the "environmental information" did not have the status of "further information" which was "directly relevant to reaching a conclusion on the significant effects on the environment" and for that reason did not need to be taken into account. However, environmental information is at the core of an ES and if not taken into account in assessing impacts, then the decision whether to grant development consent will not be based on accurate assessment. 58. The Applicants found that there was a lack of information about the Nautilus and Eurolink projects which justified failing to assess them. They claimed there was no breach of its obligations under the EIA Regulations 2017 as there was insufficient reliable information on the projects to carry out a cumulative impact assessment. The information specified in Advice Note 17 was not available. The projects were a considerable way from being "existing or approved projects" for which cumulative assessment would be required by reference to paragraph 5 of Schedule 4 to the EIA Regulations 2017. This lack of initiative is remarkable when NGV is a subsiduary company of NGET. 59. The ExA's Conclusions to the SoS had drawn attention to the "marginal compliance" of ES topics flood risk, historic environment and landscape and visual onshore. Also, there were instances in which the "siting, design and effects of the proposed development approach the margin of what can be accepted in policy terms…" [EN010077-009800 Volume 2, 31.2.1]. 60.The ExA's Conclusions on the Case for development Consent were more forthright. They are quoted below because the conclusions were based on the	55. The judgment given by Lang J in the cases of SASES v. SoS, EA1N and EA2 strongly supports the applicant's view with respect to whether it is reasonable to expect cumulative assessment to be undertaken with projects for which little to no information exists. 56. On January 2026 National Grid Ventures (NGV) published information to support its statutory consultation, which included proposals to extend the Friston (Kiln Lane) substation. The Applicant has reviewed this newly published information to confirm if it changes any of the assessment findings reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This review, reported in Appendix C of **Application Document 9.108 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 - Appendices** submitted at Deadline 5 concluded that other than additional cumulative loss of agricultural land at the Saxmundham Converter Station, the new information available for LionLink, including the proposed extension to the substation, does not change any of the findings as originally reported. With respect to landscape effects, this is in line with East Suffolk Council's view, expressed during the examination of the EA1N and EA2 projects, that "*There are unlikely to be any significant additional impacts on landscape character given that the extensions will be additions, to what will by then be, if consented, a substantial complex of industrial scale infrastructure*". 57-65. No response necessary. 66. It is not clear why a project would benefit from withholding information in the earlier stages of pre-application. At the point of application it would be necessary, within the associated Environmental Statement, for an assessment of potential inter-project cumulative effects to be reported. Irrespective, it is simply not possible for the Applicant to obtain information about another project that the project proponent is unwilling or unable to provide. 67. Given that NGV is currently still in the statutory consultation phase for LionLink, it is considered unlikely that the application will be submitted in early 2026. 68. In response to the question "*If a relevant future scheme has been identified as potentially having a cumulative effect but has not been assessed cumulatively in an ES due to limited details, how should its cumulative effects be assessed when the project is ready to be submitted for a DCO? Should it be assessed retrospectively with the earlier and now determined Friston projects as cumulative schemes?",* for any future scheme ready to submit an application for a DCO, it will be necessary within the associated Environmental Statement for an assessment of potential inter-project cumulative effects to be reported. This assessment will need to assess the cumulative effects with the Sea Link project, for which a substantial amount of information will be available, as the Sea Link project will be an 'other existing and, or approved development'. The Sea Link project will not be baseline until it is constructed and operational. As such any future scheme will be assessed "*with the earlier and now determined Friston projects as cumulative schemes*" and will therefore "*arrive at the most accurate assessment of cumulative environmental effects".* 69-71. No response necessary 72. The Applicant's response to Mr Bridge's representations regarding 1LVIA2 and 1CH3 are provided above.

ExQ1	Point Raised	Applicant's Response
	incomplete assessment of cumulative schemes and the weaker EN-1 policy on heritage harm than existed shortly after. [28.4.4] The local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. 61. [28.4.45] In that regard, the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location. This ExA does not seek to fetter the discretion of future decision-makers about additional development proposals at this location. However, it can and does set out a strong view that the most substantial and innovative attention to siting, scale, appearance and the mitigation of adverse effects within design processes would be required if anything but immaterial additional development were to be proposed in this location. 62. [28.4.6] In relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution), to landscape and visual impacts and to impacts on the historic built environment, should these arise from additional development proposals in the future. 63. The ExA had added a "significant caveat" to the rDCO. Its recommendation was based on the legal and policy framework extant on the day the Examination closed, 6 July 2021. The ExA was aware of the proposed updates to the Energy Suite NPSs against which the proposed project had not been examined (nor drawn to the attentionof the IPs). The SoS was advised that if the situation changed, the ExA's recommendations may change. The SoS had to assess "on what terms any further consideration of the rDCO or consultation with the IPs might be necessary." [EN010077-009800 Volume 2, 30.7]. 64.Lang J concluded in favour of EA1N and EA2 as "the developments in question were not "existing and/or approved projects" in respect of which a cumulative assessment would be required by reference to paragraph 5 of Schedule 4 of the EIA Regulations 2017" [197]. "The Extension Appraisal did not constitute a cumulative impact assessment. The two projects were at such an early stage that there was not sufficient reliable information to undertake a satisfactory cumulative assessment" [198]. 65. This is particulalry relevant when the sheer scale of development proposed for Fristion, Saxmundham and the surroundings in East Suffolk is of an industrial character so antithetical to the character of the countryside inside and outside the National Landscape. There has never been a strategic plan proposed or adopted	

ExQ1	Point Raised	Applicant's Response

for this intensive and permanently harmful infrastructure and its parasitic uses, let alone submitted for public consultation.

66.If this scenario of successive incomplete environmental assessments is allowed to stand and be repeated, there will be a temptation for future applicants to keep project details so vague that technically they do not qualify for cumulative assessment, when cumulative impacts are highly likely given the scale and nature of the projects in combination. This incremental submission and assessment of applications undermines the statutory purposes of the EIA process.

67. This conundrum is present in the Sea Link DCO process. NGET has submitted numerous plans illustrating several options for schemes on-shoring between Southwold and Aldeburgh and connecting to Saxmundham's converter stations with the additional possibility of connecting through the NG MITS substation to the pylons at Friston. LionLink is expected to submit its DCO application in early 2026 when the Sealink DCO will be concluding.

68.If a relevant future scheme has been identified as potentially having a cumulative effect but has not been assessed cumulatively in an ES due to limited details, how should its cumulative effects be assessed when the project is ready to be submitted for a DCO? Should it be assessed retrospectively with the earlier and now determined Friston projects as cumulative schemes? This would arrive at the most accurate assessment of cumulative environmental effects. If not, successive assessments will be adopting the increasingly harmed environmental baselines which have weaker values and thus allegedly less harmful effects. Without a finite scope and a cumulative assessment of all proposed projects on the unspoilt designations, this part of Suffolk will be harmed for ever. The overall assessment of environmental effects would be wholly inaccurate and negate the statutory process and its purposes. Precedents for harm will be set for all the other National Landscapes.

Sea Link's Cumulative Schemes Application documents:

EN020026-000245 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects – Figures

EN020026-000466-6.4.2.13.A ES Figures Suffolk Descriptions of Other Developments

EN020026-000245-6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects

69. NGET assessed the total cumulative effects for relevant other developments for Landscape and Visual in the grouping of Sizewell C, EA1 and EA2, and LionLink in Table 13.35. The summary assessment identifed significant cumulative effects from EA1N, EA2 and LionLink on the S&EC&H NL AONB and the Suffolk Heritage Coast during construction. At operation, it was concluded that "The potential for for significant cumulative effects is unlikely due to sufficient geographic separation, intervening vegetation , reinstatement of cable corridors and distance between the onshore permanent elements of the developments."

ExQ1	Point Raised	Applicant's Response
	70.The overall assessment of cumulative effects with all projects concluded: "No significant cumulative effects anticipated for operatinand maintenance."	
	71. The assessments for total cumulative effects for Cultural Heritage are in Table 13.38. The impacts on the settings of designated assets for EA1N and EA2 identified "potential impacts" without a description. LionLink's effects are assessed limited to the agricultural component of the fire-damaged Wood Farm's setting. The overall assessment of cumulative effects for all projects have been assessed as "Not significant."	
	72. Table 13.1 describes the Study Areas for each topic. The geographical limitations for those for Landscape and Visual and Cultural Heritage have been identified in 1LVIA2 and 1CH3. The earlier Stage 1 and 2 assessments of the long-list of all individual projects further reveal that the omission of key assets, the misunderstanding of the widespread character and sense of place of the countryside, let alone the context of the NL AONB, have all underestimated the level of the cumulative effects. The misapplication of policy and law on settings demonstrates the Applicant's conclusions "Not significant" are seriously flawed.	

4. Response to Relevant Representation by Nicholas Bridges [RR-3944]

Table 4.1 Applicant's Response to Relevant Representation by Nicholas Bridges [RR-3944]

Objection Point	Point Raised	Applicant's Response
A	**A – THE AREA OF SEARCH** 3.5. The principal planning constraints on the proposed siting at Saxmundham and Friston are the designated area of the Suffolk & Essex Coast and Heaths Area of Outstanding Natural Beauty (S&EC&H AONB) and the defined Heritage Coast. AONBs are recognised by and subject to several pieces of United Kingdom legislation, policy and guidance, including: • National Parks and Access to Countryside Act (1949) • Countryside and Rights of Way Act (2000) • 25 Year Environment Plan (2018) • National Planning Policy Framework (2024) • Local Planning Authority Development Plans (SCC, ESC and others) 3.6. AONBs are designated for their natural beauty. The natural beauty of AONBs is defined by 6 characteristics: • Landscape quality • Scenic quality • Relative wildness • Relative tranquillity • Natural heritage features • Cultural heritage 3.7. The Heritage Coast definition is to conserve the best stretched of undeveloped coast in England. They are established to conserve, protect and enhance: • The natural beauty of the coastline • Their terrestrial, coastal and marine flora and fauna • Their heritage features • Encourage and help the public to enjoy, understand and appreciate these areas Maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures • Take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts Landscape Character 3.8. The estuaries (Blyth, Alde-Ore and Deben) were formed through a combination of subsidence, climatic changes and sea level rise following the retreat of the ice sheets of the Anglian Glaciation over 400,000 years ago. These processes resulted in the 'drowning' of coastal river valleys and the formation of estuaries. 3.9. However, the distinctive character of the coastal landscape is also the product of marine erosion and deposition, natural processes which are extremely complex. The sandy shelly crag geology is soft and easily eroded by the sea and wave action, which has meant that the Suffolk coast has seen considerable change over the centuries. Erosion, as a result of the rising and falling tides and the annual cycle of storms, is contrasted by the deposition of often steep and shelving shingle beaches, which also characterise the coastline in the Study Area. Shingle spits are a feature of the area and Orford Ness is a dramatic example of longshore drift - the process of movement and deposition of eroded material, in a predominately southwards direction, along the coast. The spit at	3.5 – 3.14 Refer to the Applicant's response to AP47 in Table 2.1 and 1LVIA11 in Table 3.2 above regarding the Heritage Coast and Alde Estuary. 3.15 – 3.26 Refer to the Applicant's response to point 4.4 in Table 2.1 above

Objection Point	Point Raised	Applicant's Response
	Orford Ness gradually formed at the mouth of the River Alde just to the south of Aldeburgh and over centuries has grown in length, forcing the river further south and parallel to the sea before eventually meeting the ocean at Shingle Street. 3.10 The proposed development is "in an area that is predominantly rural in nature." [EN020026- 000226-6.1 Environmental Statement Non Technical Summary, para 1.6]. Its Plate 1.1 illustrates the onshore environmental constraints from the North Sea inland to Saxmundham. [Figure not included] 3.11 The extent of the Area of Search was determined by combining the receptors potentially impacted. This differed according to each ES discipline. The designations covering the areas are multiple and many overlap. 3.12. The applicant's Scoping Report [6.14] gives no specific reason for the limit drawn on the plans, only the "likelihood to be subject to significant effects" (para 1.5.3.2). 3.13. The extent of the Area of Search was noted in the Scoping Opinion [Doc ref. 6.15, ID 3.1.5 and 3.1.6]. The ExA requested the "Study Area be kept under review for effects on sensitive visual receptors and it should be agree with relevant consultation bodies." The ES should include an assessment of effects on the Heritage Coast, where significant effects are likely [3.1.7]. The ES should include consideration of all relevant seascape character types, including Inland Navigable Waters n(i.e. including the Alde estuary), Regional Seascape Character area SCT01 [3.1.8]. 3.14. The Area of Search was discussed between the applicant's consultants and stakeholders such as SCC, ESC, Historic England, Environment Agency, RSPB, Suffolk Wildlife Trust, etc. at a "landscape thematic meeting on 24 May 2023. The study area will continue to be reviewed as the Suffolk Onshore Scheme evolved through to ES and DCO submission" (PEIR Vol 1, Part 2, Chapter 2, p38). 3.15 ZTV plans (Peir Vol 3, Part 2, Chapter 4, Figures) superimposed on a map of designated heritage assets were produced in sets of 6 sheets for 3 scenarios: the converter station and Friston substation individually and both combined; a further set with 2 more co-location converters. Sheets 4 show the potential for visibility at St Botulph's church and the ridge of the south side of the River Alde, and Sheets 6 extensive visibility on both sides of the Alde down to Slaughden and Martello Tower CC. [Figures not included] 3.16 Note that the Area of Search excluded the Alde estuary as it did in the Landscape & Visual Figures (Peir Vol. 3, Part 2, Chapter 2, Figures). So, before the DCO Application, receptors were being excluded. The hatching of the AONB	

Objection Point	Point Raised	Applicant's Response
	area was even excluded over the waters of the estuary, despite the AONB MP specifically stating that these were integral parts of the designated area. [Figures not included] 3.17 The Area of Search excluded the Alde Estuary, even though the ZTV plans for Cultural Heritage and Landscape & Visual illustrated above show the proposed development would be visible on the south side of the Alde estuary and at Slaughden. The estuary is covered by multiple policies: AONB, Heritage Coast, Ramsar, SSSI, SPA. Protection by multiple policies of nature and wildlife has allowed invertebrates to thrive in the intertidal mud flats upon which birds forage. The Blyth, Alde and Ore, Deben, Orwell, and Stour estuaries in the SC&H AONB are the locations of some of England's finest wildlife habitats, intertidal areas of mudflats and saltmarsh [Suffolk & Essex Coasts and Heaths AONB Management Plan, 2023-2028, p14]. The Alde estuary is unusual and special for the conglomeration of receptors which contribute to a sense of a place with very high values. The Scoping Opinion advised that "heritage specific viewpoints should be produced to support the heritage assessment. Suitable cross-referencing between the LVIA aspect chapter and Cultural Heritage aspect chapter should be included." [6.14 – 3.1.11]. [Figures not included] 3.18 Assessment of these multiple receptors have not been submitted by the applicant, although they were tabulated in the PEIR Landscape & Visual (PEIR Volume 1, Part 2, Chapter 2, 2.2.2.58 & Table 2.2.5). No reason has been given for their exclusion by drawing the Area of Search so narrowly. In my professional opinion, the evidence produced in the applicant's own submitted documents and my subsequent research and assessment indicates there would be many effects of the proposed development on the AONB. This appears to be a blind spot in the assessments of effects by the consultants. Settlement and Land Use 3.19. The AONB is perhaps best known for its archaeological evidence dating to the Anglo-Saxon period. The royal cemeteries at Sutton Hoo, with their wealth of fantastic finds, are the most famous, a similar smaller cemetery has also been found at Snape, and evidence is emerging of royal settlement at Rendlesham between the 5th to 8th Centuries. Cultural History - Iken 3.20. The ES separates the heritage and landscape topics into separate Chapters. This is standard practice on large projects with complex receptors. In my experience, they should not be considered in discipline silos. There are inevitable overlaps – each consultant should identify and assess their effects within their remit. [Figures not included]	

Objection Point	Point Raised	Applicant's Response
	3.21 Iken is one of these. The results of excavations in 1977 at St. Botulph's Church, Iken were published in 1984 [S. West, R. Cramp & N Scarfe, 'Iken, St Botolph and the Coming of East Anglian Christianity', Proceedings of the Suffolk Institute of Archaeology & History XXXV (1984), pp 279-302.] The authors concluded that this was the place where St. Botolph was allowed by King Anna to set up a Benedictine Abbey in 654 AD, the place described as Icanho by Bede in the Anglo Saxon Chronicle. 3.22. The article and Wikipedia summary are attached in Appendix A, together with contemporary photographs. There are multiple linked topics to be assessed: • Cultural: The site of one of the earliest places of Christian worship in East Anglia, established by a Saint who founded the Benedictine order in England, and was so revered that his remains were exhumed for the site after its destruction to be taken eventually to Bury St. Edmunds for safety. • Topography: The church is sited on a high promontory of Coralline Crag whose prominence is very unusual to find on all of the other tidal estuaries in the AONB. The flood map shows that in extremis Botulph's church site will revert to its original island status. • Historical landscape: Botulph would have landed from the sea before the mouth of the Alde was blocked by the longshore drift of shingle. Yet the expanse of water at high tide allows understanding of why this site was selected for its security in the turbulent wars between the East Anglians and Mercians. • Heritage asset setting: The church tower is visible from all parts of the wide and long upper estuary of the Alde above the trees surrounding the burial ground. • Landmark: The church is a rare and historic landmark within the flat landscape and from the water. • Communal: The congregation is strong following the rebuilding after the fire, and the church is a destination of the public footpath from Snape Maltings on the southern shore of the estuary. 3.23. The ZTV plans also show that visibility will be possible at Slaughden and by Martello Tower CC just south of Aldeburgh where the Alde is prevented from entering the sea by the historic southward longshore drift shingle deposits. There will also be visibility from public footpaths along the river wall on the west side of the Alde opposite Slaughden, and probably from another footpath along Iken beach. [Figures not included] <u>Military History</u> 3.24. Martello Tower CC is the northernmost of the East Coast forts built during the Napoleonic War between 1808-10 by Royal Engineers to deter and slow down any invasion by Bonaparte's forces. It is the largest with a unique clover-leaf plan and the rare moat partially survives. Subsequently it was retained in use into the mid C19 and sold in 1932. It was commandeered as a military watchtower in WWII. It has architectural and historic special interest. Its siting was specific, recorded by the Royal Ordnance engineers, and its setting to sea and river is unspoilt. It is listed Grade II* and is a Scheduled Monument, now	

Objection Point	Point Raised	Applicant's Response
	owned and let by the Landmark Trust. Its significance has not been assessed, neither the effects of the proposed project on it. The natural environment 3.25. The presence of visible wildlife and the unspoilt riverscape combine in one of the landscape characters recognised in the 2012 Lottery Funded Touching the Tide report. This is one of the baseline studies which has informed the previous and current version of the S&EC&H MP. This was updated, rather than paused as recommended by the DEFRA Secretary of State in 2022, due to the "significant planning pressures on the AONB due to Nationally Significant Infrastructure Projects that are in part being driven by commitments to achieve net Zero by 2050." [S&EC&H MP 2023-2028, p.10]. 3.26. The ExA is requested to ask NGET to include a proper assessment the Alde estuary in the Cultural Heritage and Landscape and Visual chapters of the ES. The model used to generate the ZTV plans should be run again further south to include the southern side of the Alde estuary, down to Tunstall Road on the ridge.	
B	**B – THE IMAGES USED IN THE LVIA** 3.27 The assessments of the LVIA viewpoints' baselines is in DCO doc. 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution. The images of the Proposed Project are only modelled as AVR1 wirelines. These have been assessed for the magnitude and scale of effects, in years 1 and 15 in operation, both winter and summer. None of the images of the Proposed Project have been rendered to AVR 3 standard [Figures not included] 3.28 In my professional opinion, the level of detail in the assessments cannot be justified from the limited quality of AVR1 images. The massing of the buildings is impossible to understand, there are no materials, colour or texture to understand how different light conditions will render the building with the seasons. None of the associated wires and external equipment are modelled, nor the perimeter fencing. 3.29. This may reflect the level of detail in the drawings of the Proposed Project building submitted for DCO approval 2.13 Design and Layout Plans. The layout and components of the electrical buildings and components are very specific as one would expect. But there are no details of material and detailing of the converter sheds, not the landscaping around them and within the site. It seems that NGET wanted to submit the overall design with limited information. The consequences of this are explored further in Topics C and D below. 3.30. The ExA should request the applicant to either limit the scope of the LVIA assessment to what can be assessed or submit more detail of the Proposals so they can be assessed to EIA standards.	3.27 – 3.30 Refer to the Applicant's response to 1LVIA12 in Table 3.1 above regarding the visualisations.

Objection Point	Point Raised	Applicant's Response
C	**C - THE DETAIL OF THE DESIGN SUBMITTED** NSIP – Advice on Good Design, 16 April 2025 3.31. The compliance with Design guidance is explained in several application document with some repetition. 7.1 Planning Statement explains how it considers good design is embedded in the Proposed Project. 3.32. NG has published its own Horlock Rules Guidelines on the siting and design of Substations. These include "avoiding altogether nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections." (Section III, para 2). "Areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as reasonably practicable." (Section III, para 4). 3.33. On design: • With outdoor equipment, a preference should be given normally to a low profile design with low height structures and silhouettes appropriate to the background. • Commission exterior design and colours appropriate to the surroundings. • Materials and colours for buildings, equipment and fencing should be chosen to harmonise with local surroundings • The design of access roads, perimeter fencing, earth shaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings 3.34. On environmental reporting, descriptions of "Operational features of the project and relevant measurements of emissions such as noise, vibration, light, heat and electric and magnetic fields." 3.35 DCO 7.12.1 Design Principles Document – Suffolk identifies the objectives of the design process. It identifies the NPS Policy Statements, Design Guides and Local Policy and specific AONB Guidance. Critical Design Constraints are at the top of the hierarchy in recognition that, "electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure." 3.36. The principles of siting and cable routes are covered in DCO 7.3 Design Development Report. 3.37. DCO 7.11.1 Design Approach Document – Suffolk, which is the equivalent of a Design and Access Statement, assesses different options for massing the converter, including colour, pattern and materials. It analysis the site and its context, local character, the generic design parameters, design evolution, the comments from the Design Review Panel, mixing different masses with roof forms, skyline profiles, materials, patterns, scale of cladding components, all with tone and colour studies. The appearance of different solutions are explored with	3.31 – 3.41 Refer to the Applicant's response to points raised around design in Tables 2.1 and 3.1 above.

Objection Point	Point Raised	Applicant's Response
	AVR3 renders within the selected viewpoint baselines. International exemplars were studied for effectiveness of massing in different site contexts. 3.38. Consultation comments from SCC, Esc and Design Review Panel are stated in 7.11.2 (para 1.4.6) have been addressed in doc. 7.11.1. 3.39. Four different design approaches were developed in tandem with the DCO 7.12.1 Design Principles Document. Yet after this analysis no decision was made to select one design to submit as the DCO application. 3.40. Despite this, the character and effects of the proposed converter station and substation designs can be understood. Themes for the standards to be met recur through all policy and guidance, sampled below in the NIC Design Group's Design Principles for Infrastructure which include: • To "design for people…, make it human scale, easy to navigate, and instinctive to use, helping to improve the quality of life." • Places are to "provide a strong sense of identity and improve the natural and built environment; make a positive contribution to landscapes within and beyond the project boundary." 3.41. The functional and safety constraints are clear to see. The change from rural farmland to the scale of the 26m and 18m heights of the proposed converter and sub-station windowless sheds with multiple overhead cables on plots 250m square minimum, floodlit and surrounded by 2.8m fencing in visually open security corridors, will always be dramatic. Despite the best efforts of the architect's mitigation of cladding and roof forms, the sheer scale and extent marks the sheds as a sterilisation of space and landscape. These buildings are intrinsically alien and will be harmful in many ways.	
D	**D – EFFECTS OF IMPORTANT ELEMENTS NOT SUBMITTED** 3.42. The drawings submitted for the ExA and SoS to include in the DCO as the means to control the development can be found in DCO Section 2. These show the land needed to construct and operate the Proposed Project, the layout and dimensions of the underground cable routes and their jointing, alterations to highways, hedgerows and trees to be removed, and the two major buildings. 3.43. The ExA recommendation and approval is limited to what has been submitted. It can only approve an application when its purposes, uses, design and effects can be fixed and controlled. These Section 2 drawings can be approved by the ExA and SoS as they describe parts of the design precisely. Any further pre-commencement details required can be listed in the DCO. 3.44. The ExA can only approve when it is satisfied that it understands all the effects of the proposed development. By not submitting a complete set of architectural and landscape drawings of the converter and substation sites, NGET have left an information void. This seems unnecessary as it has commissioned most of the preparatory design work already. The ExA is left in the invidious position of having either to guess what NGET will finally propose,	As highlighted above the use of a parameter-based approach is standard practice when undertaking Environmental Impact Assessment of DCO projects. It allows for a worst case assessment prior to the detailed design being undertaken and the design approach being finalised in line with the detailed design. The magnitude of effects would only ever be the same or lower based on this approach; never higher.

Objection Point	Point Raised	Applicant's Response
	request final details (at the risk of possibly extending the Hearing beyond the 6 month time limit), or refuse. 3.45. The highways drawings showing land needed for wide bell-mouth road junctions have notes stating "Proposed arrangements shown for indicative purposes only. Dimensions and design may vary following completion of site surveys and the detailed design." DCO ref. 2.13 Design and Layout Plans, (p 21, drawing no. DCO/S/DE/SS/1214). This seems an unnecessary condition when it is standard practice to submit in LPA planning application tracking of key vehicle movements such as fire engines, refuse vehicles, and disabled parking. This drawing also illustrates a truck train 74.7m long for very heavy loads for which the land needed has been carefully drawn as part of the limits.	
E	**E – USE OF THE 'ROCHDALE ENVELOPE'** 3.46. Due to the information void, NGET is relying on the ExA approving the use of the Rochdale envelope to give the applicant latitude to complete the design after the DCO has been issued. NSIP – Advice Note 9 – The Rochdale Envelope, July 2018 3.47. This Advice Note addresses the level of flexibility which would be considered appropriate in order to address uncertainties associates with application for NSIP approval. It is employed where the nature of the Proposed Project means that some details of the whole project have not been confirmed (for instance precise dimensions of structures). 3.48. EN-1, EN-5 and the NS for National Networks all stress the need to ensure that the significant effects of a Proposed Project have been assessed. I have described above in Topic B that the LVIA is deficient because it does not have a final design which can be rendered in sufficient quality to be included in the operational state. If the good work in DCO 7.11.1 Design Approach Document – Suffolk was completed, the LVIA images could be produced as VAR3s and the LVIA completed. The significant effects could then be assessed properly. 3.49. It is unreasonable for NGET to hold back simple information at this critical stage in their long approvals programme solely to retain flexibility within the Rochdale Envelope principles. There may be other topics where details can follow after the DCO because their effects have been assessed. But this does not apply to the architectural and landscape design. The only uncertainty seems to have been generated purposefully by NGET. 3.50. When this Proposed Project will have such harmful effects, it is incumbent on the applicant to include the requisite level of detail and the ExA to require it. The Advice Note records the very specific propositions in the Court's judgement The Advice Note states (para. 5.2) clearly: "Implementation of the Rochdale Envelope assessment should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment." As NGET have commissioned and submitted most of the design for consultation and developed it further, they should be requested to complete and submit the architectural design and landscaping. The ExA can then make a more	3.46 – 3.50 Refer to the Applicant's response to the Rochdale Envelope in Table 3.1 above and regarding design control matters in Table 2.1 above.

Objection Point	Point Raised	Applicant's Response
	informed analysis of the Proposed Project and give more weight in its recommendations to the SoS.	
F	**F – THE SELECTION OF THE SAXMUNDHAM SITE** Alternative Options Considered at Strategic Proposals Stage 3.51. Para. 2.2 in the ES Non-Technical summary (DCO ref. 6.1) identifies four options which were appraised. The only initial landfall considered was in the Sizewell area. SL2 - Sizewell area and Richborough area offshore was selected. The Corridor and Preliminary Routing and Siting Study [ref. 8.1, October 2022, paras. 2.1.1 to 2.1.5] does not explain or justify why, if the power was being transmitted to Kent, a landfall in the Sizewell area was essential. 3.52. The 2019/2020 NOA is cited as the source of the assessment but no explanation is given. In the absence of any public justification for the eventual selection of Saxmundham for the converter station as opposed to placing it at sea, the choice of this application's site must be questioned. 3.53. SEAS have made a case for the converter station being located offshore. As the principal purpose of the Saxmundham converter station is to redirect power from the wind farms in the North Sea out to Kent and not to connect to the pylons coming from Sizewell, there is no need for it to be in countryside and causing both temporary and permanent significant effects on landscape, wildlife and the local economy. 3.54. The applicant considers what it concludes to be limited harm to be more than balanced by the benefits to the national infrastructure. They do not consider that even this harm would not be caused at all with a converter station offshore	3.51 – 3.54 Refer to **Application Document 9.129 Applicant's Response to ExQ2 2GEN1 and 2GEN2 in respect of Need** submitted at Deadline 5.
G	**G – THE USES OF AND CONNECTIONS TO THE FRISTON SITE** 3.55 The location of a substation at Friston to connect SPR's offshore wind-generated power to the 400kV grid was only necessary because SPR refused to implement in full its DCO for underground cables from Bawdsey to Bramford. 3.56. The 3.57 harm to the setting of the SC&H AONB and local receptors will be entirely unnecessary. The extent of this landscape and visual harm can be seen on the ZTV plans referenced above. 3.58. The ExA should understand that the harm caused by Friston's DCO should not be considered as part of the baseline before assessing the Proposed Project. In LVIA and TVIA assessments, consented but unimplemented projects are only assessed as cumulative developments after the Proposed Project has been assessed..	3.55 – 3.59 Refer the Applicant's Response to AP50 in Table 2.1 and 1LVIA12 in Table 3.1 above.

Objection Point	Point Raised	Applicant's Response
	3.59. As NGET have included the whole Friston substation within their Proposed Project, the harm caused by that element will have to be assessed against the existing undeveloped baseline.	
H	**H – THE IMPLICATIONS OF SIZEWELL C HAVING BEEN COMMISIONED** 3.60. The Government has confirmed funding to allow Sizewell C to proceed. It has also provided funding to extend the life of Sizewell B. Thus, both power stations will need most of the capacity of the dual line of pylons connecting them to the national grid. 3.61. The remaining capacity available to be used either from the Friston substation or the Saxmundham converter needs to be calculated. If this is insufficient, will the two DCO projects be viable? If only one, which one? 3.62. This information is critical to financial viability, especially the taxpayer's contribution to the financing of NGET's Proposed Project. 3.63. If either or both of the two proposed stations are going to be redundant, the ExA should not allow their sites to be used for another energy use which is inappropriate for the character of the East Suffolk countryside. The consequences of co-locating converters or similar very large industrial buildings at Saxmundham are noted in Topic I below.	3.51 – 3.54 Refer to **Application Document 9.129 Applicant's Response to ExQ2 2GEN1 and 2GEN2 in respect of Need** submitted at Deadline 5. Within this response it covers the fact that Sea Link actually adds capacity to the region therefore it would not be necessary to chose between the two DCO's.
I	**I – THE CUMULATIVE IMPACTS** NSIP – Advice on Cumulative Effects Assessment, 25 March 2025 3.64. This Advice Note summarises the process for undertaking cumulative effects assessments. It quotes the legal and policy requirements, interrelationships and combined effects and the 4 Stages from establishing long and short lists of existing and / or approved developments, information gathering and assessment. 3.65. The cumulative effects between projects are in DCO 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects. The key potential projects are Sizewell C, East Anglia ONE North offshore, East Anglia TWO offshore, and LionLink offshore interconnector. All progressed to Stage ¾ for Landscape & Visual and Cultural Heritage except not the latter for Sizewell C. 3.66. There was potential for significant cumulative effects from EA1N and EA2 on the SC&H AONB (Table 13.35) during construction, relying on this to be mitigated by growing vegetation and distance between onshore permanent elements. Likewise, for LionLink. 3.67. The summary conclusion on Landscape & Visual (para 13.4) is that "The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the Suffolk Coast and Heaths AONB has the potential to alter the perception of the AONB with construction of major energy	3.64-3.67 No response required 3.68 There are currently only two converter stations proposed for the site at Saxmundham; the Saxmundham Converter Station proposed as part of Sea Link and the LionLink Converter Station. The cumulative effects of the two converter stations being co-located on the site have been assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060].** The assessment has been reviewed based upon the information published by NGV on 13 January 2026 and, other than a cumulative effects with LionLink in respect of the loss of agricultural land, the assessment findings remain unchanged (See appendix C of **Application Document 9.108.1 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 – Appendices** submitted at Deadline 5).

Objection Point	Point Raised	Applicant's Response
	projects becoming a temporary characteristic feature of the landscape. These total cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time" 3.68 When considering the number of converter anticipated and possible on the Saxmundham site, as drawn in DCO7.10 Coordination Document, Appendix A, Section 3 (see Figures 13 and 13 below), the change character will be immense. Each converter is an enclosure 250m square, with spiders webs of wires connected into 26m high sheds. This industrialisation of the countryside on a massive scale.	

References

Blair. (1992). Anglo-Saxon minsters: topographical review. In J. B. Sharpe, *Pastoral Care Before the Parish* (pp. 226–67). Leicester.

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