



SEAS Comments on ExA’s Second Written Questions
ExQ2

SEA LINK: EN020026
DEADLINE: 5 – 10 March 2026

SEAS IP: [REDACTED]
Date: 10 March 2026

Please find SEAS Comments on [ExQ2](#) - questions 2GEN1; 2LVIA10 and 2LVIA11 as follows:

ExQ2	Question:	SEAS Comments:
2GEN1. Applicant	<p>Need</p> <p>At deadline 3 (DL3) [REP3-144], in issue specific hearing 2 (ISH2) [REP4-156] and summarised in [REP4-238] Suffolk Energy Action Solutions (SEAS) raised concerns in relation to need. SEAS state that there is no need for the proposed development and that any shortfall in capacity could be met through reinforcement of existing infrastructure. In ISH2 the ExA specifically asked the applicant to respond to SEAS</p>	<p>On 6 March, SEAS sent a clarification note to the ExA and SeaLink regarding SEAS [REP4-156], <i>How the Applicant’s “need” case has fallen away, and why it matters in section 104/NPS terms</i>. This was intended to assist the Applicant in preparing its response to 2GEN1.</p> <p>As this note has not yet been published, it is reproduced here within 2GEN1 to keep the relevant material together and for ease of reference;</p> <p><i>In light of ExQ2 question 2GEN1, we are writing to provide additional clarification relating to SEAS’s Deadline 4 submission on “Need” (REP4-156), with the intention of further assisting the ExA’s ongoing assessment and to inform the Applicant’s Deadline 5 response.</i></p> <p><i>In Appendix A of REP4-156, we outline how more straightforward grid upgrade solutions, can fully resolve the N-1 “worst case fault” “need” scenarios in both Suffolk and Kent, for a fraction of the cost of Sea Link. Namely, by reconductoring the</i></p>

SEAS D5 Comments on ExQ2

	<p>[REP3-144] submission [EV6-011]. This has not been done. The ExA accepted a late DL4 submission from the applicant [REP4-236]. At paragraph 1.1.4 of this submission it states, “Some submissions are not responded to again in this document because it is the Applicant’s view that all matters raised have been responded to previously, or that no further comments are necessary.” The applicant is requested to provide appropriate responses to all submissions. Provide a response to the SEAS submissions detailed above, and any other submissions not already responded to. In the responses either provide a detailed answer or clearly sign post to where this answer can be found using examination library references/page or paragraph numbers.</p>	<p><i>existing 55km overhead-line (OHL) Sizewell to Bramford double circuits - works that are required in any event on a lifecycle maintenance basis ahead of Sizewell C becoming fully operational - together with the provision of a new 29 km 400kv double-circuit OHL routed alongside the existing Canterbury North–Kemsley line.</i></p> <p><i>It is important to highlight that not only would these works entirely meet the “worst case fault” need, but that Sea Link itself would not do so. So these low-cost, low-environmental harm solutions offer something, in grid capacity terms, that Sea Link does not.</i></p> <p><i>We recognise that we may not have spelled this out clearly in our REP4-156, so we do so now.</i></p> <p><i>In particular, in Kent, the N-1 worst case fault scenario transfer deficit of about 6,516 MW across the SC2 boundary would be fully resolved by building a new 400kv double-circuit overhead-line (7,482 MW) alongside the existing double-circuit between Canterbury North and Kemsley, as proposed in Appendix A of REP4-156 and in David Stevens’ technical assessment detailed in REP4-207.</i></p> <p><i>However, in contrast, Sea Link would only offset that 6,516 MW N-1 worst case fault transfer deficit by 2,000 MW, leaving a substantial residual deficit of 4,516 MW.</i></p> <p><i>Sea Link cannot therefore be regarded as a reinforcement that resolves the identified transfer deficit across the SC2 boundary, which forms part of the network constraint relied upon to justify the Applicant’s needs case.</i></p> <p><i>We trust that this submission will assist both the ExA and the Applicant in their ongoing assessment of the ‘Need’ case for Sea Link.</i></p>
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<p>2LVIA10.</p> <p>Applicant ESC, SCC, SEAS and other relevant stakeholders</p>	<p>Cumulative effects on the AONB Applicant:</p> <p>The updated assessment of effects on the sub-factors of the special qualities and natural beauty indicators set out in the Planning Statement Addendum [REP4-092] is welcomed. The cumulative assessment provided in table 4.1 of the National Landscape Section 85 Duty Technical Note [REP1-120] is only in relation to the indicators rather than the sub-factors. Provide a more detailed cumulative assessment in relation to the sub-factors for the natural beauty indicators and special qualities indicators with a greater level of detail as to the factors that have led to the conclusions for each indicator and the magnitude of the effect. Where a temporary significant adverse effect is identified, specify the likely duration of the temporary effect and whether any avoidance, mitigation or compensation measures could be identified that would reduce the magnitude of the effects. ESC, SCC, SEAS and</p>	<p>SEAS wishes to state clearly at the outset that it remains opposed to the Sea Link project and would not normally engage in detailed commentary on mitigation measures for a scheme it considers should not proceed. In SEAS's view, a convincing and robust needs case for the project has not been demonstrated. Furthermore, SEAS notes that an alternative solution has been identified which is estimated to cost approximately £250 million, significantly less than the proposed development.</p> <p>Notwithstanding this fundamental objection, SEAS recognises that the Examining Authority must consider the application as submitted. In the event that development consent is granted contrary to the concerns expressed by SEAS and the wider local community, it is essential that the draft Development Consent Order (DCO) and associated control documents secure the strongest practicable mitigation and enforceable protections. This is necessary to minimise harm to local communities, the environment, and other affected receptors. We therefore make the following comments:</p> <p>SEAS welcomes the additional assessment presented in the Planning Statement Addendum [REP4-092] and the National Landscape Section 85 Duty Technical Note [REP1-120]. However, the cumulative assessment in Table 4.1 remains expressed primarily at the level of indicators rather than the underlying sub-factors that contribute to the special qualities and natural beauty of the National Landscape.</p> <p>SEAS agrees that clarification of the duration and mitigation of temporary significant adverse effects is appropriate. Based on the construction programmes described in the Environmental Statement and in the context of overlapping NSIPs affecting the Suffolk coast, temporary cumulative landscape effects associated with compounds, cable corridors, haul routes, construction lighting and abnormal load deliveries are likely to persist for approximately 3–5 years, particularly where construction phases coincide.</p>
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	<p>other relevant stakeholders: Suggest potential mitigation or compensation measures for the likely significant cumulative effects on the special qualities and natural beauty of the AONB, as identified in table 4.1 of [REP1-120].</p>	<p>However, SEAS emphasises that mitigation must be considered within the wider strategic context discussed throughout the Examination. Evidence presented during the Examination indicates that alternative strategic solutions and locations exist that could substantially reduce the identified landscape harm. In particular, a coordinated offshore grid or offshore mesh solution connecting to appropriate brownfield or existing industrial locations would avoid concentrating large-scale energy infrastructure within the sensitive landscape setting of the Suffolk & Essex Coast & Heaths National Landscape.</p> <p>SEAS therefore maintains that the current siting of the proposal is fundamentally flawed, and that mitigation measures cannot compensate for strategic siting decisions. The Examination has also heard substantial evidence indicating that the need case for the project remains to be clearly demonstrated.</p> <p>Should the project nevertheless proceed, SEAS considers that the magnitude and duration of cumulative landscape effects could be reduced through stronger mitigation and coordination measures, including:</p> <ul style="list-style-type: none"> • stronger design controls within the DCO governing maximum building heights, materials, colours and ancillary structures • robust lighting controls to protect dark skies, including shielded fittings and restrictions on unnecessary night-time lighting • construction management measures to minimise overlap of visually intrusive phases and ensure progressive restoration of temporary working areas • reinforcement of existing woodland belts, hedgerows and landscape structure where local screening is achievable. <p>SEAS also considers there are clear opportunities for greater coordination with other major infrastructure projects in the area that could reduce cumulative impacts, including:</p>
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	<ul style="list-style-type: none"> • coordination with Sizewell C infrastructure, including potential use of the consented Sizewell C Link Road currently under construction for construction access and abnormal load movements • coordination with East Anglia One North and East Anglia Two cable trench routes and corridors where feasible • use of existing infrastructure corridors and previously disturbed land to minimise new landscape disruption. <p>Where significant residual cumulative effects remain, SEAS considers that compensation measures could include:</p> <ul style="list-style-type: none"> • strategic landscape enhancement projects aligned with National Landscape management objectives • contributions to programmes that reduce the visual impact of existing electricity transmission infrastructure within the wider landscape • improvements to public rights of way and recreational routes affected by construction activity • long-term landscape stewardship funding for woodland, hedgerow and habitat management. <p>Given the importance of the National Landscape to the tourism economy of coastal Suffolk, SEAS also considers that financial compensation mechanisms should be explored to support tourism-dependent communities and businesses affected by the loss of landscape quality, tranquillity and visitor experience. The ability of residents and visitors to enjoy the landscape is a fundamental component of its special qualities and economic value.</p> <p>SEAS therefore considers that mitigation should prioritise avoidance through better strategic siting and infrastructure coordination, followed by strong design controls, construction management and lighting mitigation. Where residual cumulative harm to the special qualities of the National Landscape remains, compensation should include strategic landscape enhancement, reduction of</p>
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		<p>existing infrastructure impacts, and appropriate economic support for communities whose tourism livelihoods depend on the enjoyment of this landscape.</p>
<p>2LVIA11. Applicant</p>	<p>Outline Landscape and Ecological Management Plan (oLEMP) Include contingency measures for acid grassland in case reinstatement plans fail or are not achievable within the timeframes stated. This should be reflected in the REAC [REP4-235].</p>	<p><i>This question is not addressed to SEAS, but in light of previously submitted relevant evidence, SEAS offers brief comments to assist the ExA.</i></p> <p>SEAS welcome the request by the ExA to the Applicant to include contingency measures within the oLEMP, should the acid grassland creation fail. However, we also believe the Applicant should be providing more detail at this stage on the suitability of the proposed location and its soils for such creation, to ensure it is an appropriate location.</p> <p>To further aid the ExA in their question on Acid Grassland, SEAS has some observations regarding the updated Environment Statement - REP4-025 - 6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity.</p> <p>Para 2.9.32 - We would appreciate if this same question (2LVIA11) could be asked in relation to para 2.9.32 of the ES.</p>

		<p>Para 2.9.50 of the ES states only 0.3ha of the aid grassland meets the Priority Habitat criteria. Has the supporting data for this been presented elsewhere? If so, it would be useful if this were cross-referenced. If not, then it needs to be.</p> <p>Para 2.9.50 of the ES describes the presence of bands of semi-improved neutral grassland. This habitat type does not exist in the UKHab habitat descriptions, which now forms the standard guidelines. We request that this habitat be described using the latter.</p> <p>Par 2.9.63 of the ES states that the acid grassland creation location has suitably sandy soils and is close to other areas of acid grassland. However, there is no consideration of the recent land use of this location, and how that might have altered the chemical and physical composition of the soil such that it may not now be suitable for acid grassland reversion, particularly over the short-term interim period required to off-site the temporary loss of the existing acid grassland. Again, we believe the Applicant should be providing more detailed evidence that the location is suitable for such habitat creation.</p> <p>NB: We have also included the above in SEAS D5 submission 'Outstanding Issues on Ecology', so the applicant may respond.</p>
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