



## **SEAS REBUTTAL of APPLICANT'S RESPONSE TO SEAS REP3-140**

### **CUMULATIVE IMPACT**

**SEA LINK: EN020026**  
**DEADLINE: 5 – 10 March 2026**

**SEAS IP: [REDACTED]**  
**Date: 10 March 2026**

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**RE: SEAS rebuttal of 9.116 Applicant's Comments on Selected Other Late Submissions Received at Deadline 3 [REP4-236 Tables 3.1 and 3.2] – in particular comments on SEAS REP3-140 Cumulative Impact.**

#### **Introduction**

This submission provides SEAS' response to the Applicant's comments in REP4-236 on SEAS late Deadline 3 submission (REP3-140) concerning Cumulative Impacts.

Across multiple stages of the Examination (RR-5210, REP1-278, REP2-125, REP3-140 and REP4-153), SEAS has identified fundamental deficiencies in the Applicant's cumulative impact assessment. The responses in REP4-236 largely reiterate reliance on the application-stage Environmental Statement cumulative assessment [APP-060] and do not engage with the methodological and evidential issues previously raised.

In several instances the Applicant also refers to the "LionLink Cumulative Visualisations" in Appendix A of REP4-086. These figures were produced following requests from the Examining Authority during ISH2 and do not address SEAS' earlier concern that cumulative visual assessment was absent from the original assessment. In addition these visualisations consist of simplified block models which do not provide the level of detail necessary to assess cumulative landscape and visual effects. These shortcomings prevent a meaningful assessment of how the combined Sea Link and LionLink infrastructure would be experienced in the landscape; this level of visualisation is not sufficient to allow a robust cumulative landscape and visual assessment.

The Examining Authority has also required the Applicant to update cumulative assessments in light of further LionLink project information (EV6-033 Action Point 107), with revised material to be submitted at Deadline 5.

Accordingly, the cumulative framework relied upon in the Application remains under review during the Examination. In several instances the Applicant’s response consists only of a general reference to earlier documents or provides no response to the specific point raised.

The rebuttals below explain why the concerns identified by SEAS remain unresolved.

**SEAS Rebuttals of Applicant's comments (REP4-236 Table 3.1) on SEAS late Deadline 3 submission [REP3-140] - Intra-Project Cumulative Effects**

<b>Ref</b>	<b>Matter</b>	<b>Point Raised</b>	<b>Applicant’s Comments</b>	<b>SEAS’ Rebuttals</b>
1	Introduction	The Applicant’s reference to REP1A-043 does not address the substantive concerns raised in RR-5210. SEAS’s core objections – that there remains no policy-compliant cumulative impact assessment; that foreseeable NSIPs are excluded from substantive assessment; that cumulative duration, lived experience and rolling impacts are unassessed; and that impacts are fragmented by topic and scheme – remain	Both the intra-project and inter-project cumulative effects assessments have been undertaken in line with best practice, including the PINS guidance on the assessment of cumulative effects. For interproject effects assessment, the list of projects to be considered has been agreed with local planning authorities and has been based upon the latest information available at the time of the assessment. Duration has been a consideration throughout the assessment.	The Applicant’s response does not address the specific points raised in SEAS’ rebuttal REP3-140. In that submission SEAS identified a number of methodological deficiencies in the cumulative impact assessment, including the continued reliance on earlier documents rather than engaging with the substance of SEAS’ arguments, the absence of a coherent integrated cumulative assessment across the principal co-located NSIPs, the failure to assess the cumulative duration and sequential nature of infrastructure construction, and

		<p>unanswered. No new evidence or analysis is provided to remedy those deficiencies.</p>	<p>Impacts are not fragmented – topics are brought together when considering, for example, potential intra-project effects on residential properties and Public Rights of Way (PRoW), an issue that has been the subject of several discussions at Issue Specific Hearings. Further analysis of the potential for significant intra-project cumulative effects has identified that if such effects do occur, they are likely to be moderate at most. This assumes all sources of effect occur at the same time, even though this may not be the case, or would only occur infrequently. As such the Applicant does consider that the cumulative assessment is compliant with both policy and guidance.</p>	<p>the fragmentation of impacts across individual topic areas.</p> <p>The Applicant’s response in REP4-236 does not engage with those points. Instead it simply asserts that the cumulative assessment follows best practice and guidance and that the project list was agreed with local planning authorities. These statements do not address the concerns raised in REP3-140 regarding the adequacy of the cumulative assessment presented in the Environmental Statement cumulative impact assessment [APP-060].</p> <p>In particular, the response does not explain how the assessment evaluates the combined and sequential effects of multiple major infrastructure projects affecting the same locality over extended periods, nor does it address SEAS’ concern that the assessment remains fragmented across individual topic areas rather than providing an integrated evaluation of cumulative effects experienced by communities and receptors.</p> <p>Accordingly, the methodological concerns identified in REP3-140</p>
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				remain unresolved.
6		<p>The Applicant answers a different question from the one SEAS raised. SEAS is not just treating the SPR ExA passages as a narrow LVIA precedent, but as evidence that this location has already been found to be highly constrained by cumulative energy infrastructure, requiring exceptional care when further major schemes are proposed. The WR's point is that, since EA1N and EA2, additional NSIPs – including Sea Link and the foreseeable LionLink project – materially change the cumulative context and therefore require a comprehensive, lawful and policy compliant cumulative impact assessment. The Applicant's assertion that effects are "already considered" and would be "little different" does not demonstrate that such an assessment has been undertaken. The fact that EA1N and EA2 had their own mitigations does not dispose</p>	<p>This is not an accurate characterisation of the Applicant's response. A comprehensive, and policy compliant assessment of cumulative effects with LionLink, EA1N and EA2 is already provided in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The potential inter-project effects associated with LionLink, including its proposed connection into the Friston (Kiln Lane) Substation, is being reviewed now that additional project information is available to support the LionLink statutory consultation. This information includes a proposal for an extension to the substation, though this is proposed for LionLink alone and is not required for Sea Link. It should be noted that the potential for extension of the substation to accommodate LionLink (then EuroLink) and Nautilus was discussed during the examination of EA1N and EA2 and that East Suffolk Council previously</p>	<p>The Applicant's response does not address the point raised by SEAS in REP3-140. In that submission SEAS referred to the conclusions of the EA1N/EA2 Examining Authority not as a narrow precedent relating to landscape assessment, but as evidence that the Friston–Saxmundham area has already been recognised as highly sensitive to cumulative energy infrastructure development.</p> <p>SEAS' point was that the cumulative context has materially changed since the EA1N and EA2 examination, with the addition of further major infrastructure proposals including the Proposed Project and the foreseeable LionLink project, particularly in light of the further project information now available in the PEIR for LionLink. This evolving concentration of infrastructure requires a comprehensive and integrated cumulative assessment of the emerging energy hub at Friston.</p>

		<p>of the need to assess the cumulative impact of Sea Link with those schemes, still less with LionLink. No integrated cumulative evaluation is provided that addresses the combined effects of multiple colocated NSIPs at this hub, as required by EN-1, EN-5 and the EIA regime</p>	<p>commented 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” The Applicant has assessed the Suffolk Onshore Scheme, as it pertains to the Friston site, under two scenarios – one where the Friston substation is built under SPRs consent (Scenario 1) and one where the Friston substation is built under consent granted to the Proposed Project (Scenario 2). Both EA1N and EA2 are also considered in the assessment of inter-project cumulative effects as reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Significant inter-project cumulative effects on landscape character and visual amenity are reported with EA1N and EA2, LionLink, and South Saxmundham Garden Neighbourhood with these developments separately and together. Significant effects are also</p>	<p>The Applicant’s response does not engage with that issue. Instead it refers back to the cumulative effects assessment contained in the Environmental Statement cumulative impact assessment [APP-060]. However, referring to APP-060 does not address the concern raised in REP3-140, namely that the Environmental Statement does not provide an integrated evaluation of the combined and sequential effects of multiple co-located NSIPs at this location.</p> <p>The statement that LionLink is now being “reviewed” as further project information becomes available further illustrates the point raised by SEAS: the cumulative context continues to evolve, yet the assessment relied upon remains the application-stage assessment presented in APP-060.</p> <p>Accordingly the Applicant’s response does not demonstrate that a comprehensive cumulative assessment of the emerging Friston infrastructure cluster has been undertaken, and the</p>
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			<p>reported in respect of the cumulative loss of Best and Most Versatile agricultural land with Sizewell C Rail Improvements, EA1N and EA2, The Croft Farm land and buildings development and South Saxmundham Garden Neighbourhood, again both separately and together. These developments and others have been considered by other topics but have not been considered likely to have significant effects separately or together.</p>	<p>concern identified in REP3-140 remains unresolved.</p>
7-8		<p>The Applicant’s observation about the sequencing of the SPR ExA passages does not address SEAS’s point: that the ExA found the local harm from the cumulative delivery of two EA schemes to be “substantial” and the outcome “only just sufficient on balance”. SEAS relies on this as evidence that this location is already at the limits of acceptability for major energy infrastructure, such that the addition of further NSIPs</p>	<p>Please see the above response which confirms that a comprehensive inter-project effects assessment has been undertaken for all “<i>other existing and, or approved development</i>” for which there was sufficient reliable information to undertake a satisfactory cumulative assessment. All other existing and, or approved development within 20 km of the Order Limits of the Proposed Project were included on the long list and agreed with the local planning authorities.</p>	<p>The SEAS submission referred to the conclusions reached by the Examining Authority in the East Anglia ONE North and East Anglia TWO examinations, which found that the cumulative effects arising from those two schemes in this location were substantial and that the planning balance was only just sufficient.</p> <p>SEAS relies on that finding as evidence that the Friston–Saxmundham area has already been recognised as highly sensitive to the cumulative delivery of major energy infrastructure. The relevance of this precedent is that the addition</p>

		demands a comprehensive cumulative assessment, which has not been undertaken.		<p>of further nationally significant infrastructure projects in the same location requires particularly careful and comprehensive cumulative assessment.</p> <p>The Applicant's response does not engage with this point. Instead it refers again to the cumulative assessment presented in the Environmental Statement cumulative effects chapter [APP-060] and to the preparation of a project long list agreed with local planning authorities. These procedural matters do not address the substantive issue raised by SEAS, namely whether the assessment adequately evaluates the cumulative implications of further infrastructure development in a location already identified as experiencing substantial cumulative effects.</p> <p>The concern identified by SEAS therefore remains unresolved.</p>
9		The Applicant's "as and when sufficient information becomes available" response does not engage with SEAS's point that	The Applicant agrees that " <i>additional major projects have already been identified</i> " and has, in	The SEAS submission did not dispute that additional projects were listed within the Environmental Statement

		<p>additional major projects have already been identified and materially alter the cumulative context. SEAS is not asserting certainty about design detail; it is asserting that the existence of further NSIPs and major schemes now requires a lawful cumulative framework that can accommodate escalation in scale and concentration. Simply deferring consideration to an unspecified future point does not demonstrate that the present Application includes a comprehensive, policy-compliant cumulative impact assessment for the Proposals in their known and foreseeable context, particularly where the Applicant itself has acknowledged coordination with LionLink. and has stated that statutory consultation material for that project will be available during the lifetime of this Examination, and indeed as of January 2026 is available. The fact that EA1N and EA2 were consented with their own mitigation does not dispose of the need to assess the</p>	<p>fact, assessed these ‘additional major projects’ in the inter-project cumulative effects assessment submitted with the application [APP-060], based upon the information available at the time, or reasonable assumptions. As of 13 January 2026 additional information is now available for LionLink which, although it was considered in the original inter-project cumulative effects assessment, previously required many assumptions to be made in the absence of specific project information. This was only possible because of the likely similarity of the project to Sea Link and the proposal for a shared converter station site. The Applicant has committed to reviewing its previous assessment of cumulative effects with LionLink to test whether project information published in support of the statutory consultation for LionLink, which only commenced on 13 January 2026, are materially different from any of the previous assumptions used in the cumulative assessment of LionLink.</p>	<p>cumulative assessment [APP-060]. Rather, the point raised was that the emergence of multiple further NSIPs in the same location materially alters the cumulative context and requires a comprehensive cumulative assessment capable of evaluating the escalation in scale and concentration of infrastructure at the Friston–Saxmundham energy hub.</p> <p>The Applicant’s response confirms that the original assessment of LionLink within APP-060 relied on assumptions in the absence of detailed project information. The Applicant also confirms that it now intends to review its cumulative assessment in light of the information published in the LionLink statutory consultation documents. This confirms the concern raised by SEAS that the application-stage cumulative assessment was undertaken on the basis of incomplete information and does not represent a settled assessment of the cumulative context.</p>
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		<p>cumulative impact of the Proposals with those schemes. Cumulative assessment is concerned with the combined effects of multiple developments in the same place, not with whether each project was, in isolation, mitigated to an acceptable standard</p>	<p>It is standard practice in cumulative effects assessment to assess the residual effects reported for other existing and, or approved development, rather than assuming that none of the legally binding measures committed to by the project will be delivered. In fact, many Environmental Statements only provide detailed assessment of effects with committed mitigation in place. EN-1 supports this approach, stating that “<i>The cumulative impacts of multiple developments with residual impacts should also be considered</i>” (our emphasis).</p>	<p>The Applicant also refers to the practice of assessing cumulative effects based on the residual effects of other developments after mitigation. SEAS does not dispute that cumulative assessment may consider residual effects. However, this methodological point does not address the substantive concern raised by SEAS, which is that the Environmental Statement does not evaluate the implications of the emerging concentration of major energy infrastructure projects in this location.</p> <p>The fact that individual projects may include mitigation measures does not remove the need to assess the combined effects of multiple co-located NSIPs. Cumulative assessment is concerned with the interaction of developments in the same place and over time, rather than whether each project in isolation has been mitigated to an acceptable standard.</p> <p>Accordingly the Applicant’s response does not demonstrate that the Application includes a comprehensive cumulative</p>
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				assessment of the proposals in their known and foreseeable context.
10		The Applicant's response merely refers back to its earlier reframing of the SPR ExA passages and does not engage with SEAS' point. SEAS is not inviting the Examining Authority to treat those passages as determinative, but to recognise them as evidence that this location is already acutely constrained by cumulative energy infrastructure. The Applicant does not answer the WR's central argument: that, in this intensified context, a comprehensive and integrated cumulative impact assessment is required, and has not been provided.	Please see above responses that confirm that the cumulative effects assessment undertaken is entirely compliant with both policy and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as well as PINS guidance on cumulative effects assessment.	<p>The SEAS submission referred to conclusions reached by the Examining Authority during the East Anglia ONE North and East Anglia TWO examinations as evidence that the Friston–Saxmundham area has already been recognised as experiencing substantial cumulative effects from major energy infrastructure.</p> <p>SEAS did not suggest that those passages should be treated as determinative for the present application. Rather, they were cited to demonstrate that this location has already been identified through the planning process as highly sensitive to the cumulative delivery of multiple large infrastructure schemes.</p> <p>In that context, the central point raised by SEAS is that the addition of further nationally significant infrastructure projects in the same location requires a comprehensive and integrated cumulative assessment capable of evaluating the combined</p>

				<p>implications of that concentration of development.</p> <p>The Applicant's response does not address that argument. Instead it simply repeats the assertion that the cumulative effects assessment undertaken is compliant with policy, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and relevant guidance. A general assertion of compliance does not address the substantive concern raised by SEAS as to whether the Environmental Statement actually evaluates the cumulative implications of further infrastructure development in a location already identified as experiencing substantial cumulative effects.</p> <p>The concern raised by SEAS therefore remains unresolved.</p>
12	Multiple overlapping NSIPs have now been supplemented by yet further overlapping	The Applicant's referral to REP1A-043 does not engage with SEAS's point. Points 13–15 demonstrate that even where professional cumulative analysis has been undertaken (e.g. the PJA Report), it necessarily underestimates	<p>PINS guidance confirms that the information to be gathered for the assessment of other existing and, or approved development, is to include:</p> <ul style="list-style-type: none"> <li>proposed design and location information;</li> </ul>	SEAS' submission did not suggest that the Applicant should speculate about the detailed design of other projects. Rather, the concern raised was that the cumulative assessment fails to identify and assemble the full suite of overlapping

	<p>NSIPs, and other projects</p>	<p>effects because the Applicant has failed to identify and assemble the full suite of overlapping projects. Mr Ellam’s express warning that “numerous other smaller developments aren’t included” is not answered. Deferring cumulative work on the basis that “details are not available” is precisely the structural flaw identified in the WR: it guarantees that cumulative impacts are systematically missed or downplayed, contrary to the requirements of law and policy.</p>	<ul style="list-style-type: none"> <li>• proposed programme of construction, operation and decommissioning; and</li> <li>• environmental assessments that set out baseline data and effects arising from the other existing and, or approved development.</li> </ul> <p>Where such information is available for other existing and, or approved development within the zone of influence of the Proposed Project, the information has been assessed. Where such information is not available it is clearly not possible nor desirable for an Applicant to speculate about project information on behalf of the other existing and, or approved development.</p>	<p>developments affecting the same locality.</p> <p>As set out in REP3-140, evidence presented by the Applicant’s own professional witnesses acknowledges that additional developments exist beyond those included in the cumulative assessment, with Mr Ellam noting that “numerous other smaller developments aren’t included”. This concern is not addressed by referring to the availability of detailed project information.</p> <p>The issue raised by SEAS is structural: where projects are excluded from the cumulative framework on the basis that insufficient detail is available, the cumulative assessment will systematically underestimate the scale and concentration of development affecting the area. Identifying the existence of additional overlapping schemes is necessary in order to understand the evolving cumulative context, even where detailed design information is not yet available.</p> <p>The Applicant’s response therefore does not address the</p>
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				concern raised by SEAS that the cumulative assessment fails to assemble the full suite of overlapping developments required to evaluate cumulative effects in accordance with policy and the EIA framework.
17		Citing general guidance does not demonstrate that these additional schemes have been incorporated into a coherent cumulative framework for this Application. The result remains that the Proposals are being examined on the basis of an incomplete and outdated cumulative picture	The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5	<p>The Applicant's response confirms the concern raised by SEAS. SEAS' point was that the Application is currently being examined on the basis of an incomplete cumulative picture. The Applicant now confirms that it is reviewing planning information to identify additional developments and updated project information, and that the results of this review will be submitted at Deadline 5.</p> <p>This acknowledgement indicates that the cumulative context is still evolving and that the application-stage cumulative assessment presented in APP-060 does not yet represent a settled or complete assessment of cumulative effects.</p> <p>The Applicant's response therefore does not address SEAS' point that the Proposals</p>

				are presently being examined against an incomplete cumulative framework.
21	Breakdown of additional conflicting NSIPs, plus additional Housing and Major Road projects: Suffolk Water Recycling, Transfer and Storage (SWRTS) NSIP	Relying on a generic reference to “the Planning Inspectorate’s advice on cumulative effects assessment” is not a substitute for producing a full, coherent and policy-compliant cumulative impact assessment for this Application. The guidance does not disapply the requirements of the EIA Regulations or NPS EN-1 and EN-5. It does not justify deferring the assessment of known and foreseeable cumulative schemes.	The Applicant considers it to be entirely appropriate and reasonable to follow guidance developed by PINS specifically for the assessment of cumulative effects for NSIPs. The Applicant also considers that the cumulative effects assessment undertaken is entirely in accordance with policy as set out in EN-1, EN-3 and EN-5. EN-1 specifically references PINS advice note 17 (the original location of PINS guidance on cumulative effects), stating “ <i>104 For guidance on the assessment of cumulative effects, see, for example, PINS Advice Note 17 regarding Cumulative Effects Assessment (August 2019)</i> ” The need or otherwise to assess cumulative effects with other existing and, or approved development for which little or no information is available was considered in the Judicial Review by Lang J in her judgment on 13 December 2022 [EWHC 3177 (Admin)] in the case of SASES v. SoS, EA1N and EA2. The challenge was that two other developments- Nautilus and EuroLink (now LionLink)- should have been	SEAS’ submission did not suggest that the Applicant should speculate about detailed design information for other schemes. Rather, the concern raised was that the cumulative framework for the Application fails to assemble and evaluate the full range of overlapping NSIPs and other major projects affecting the area. The Applicant refers to LionLink and the Helios Energy Solar Park as examples of schemes where limited information may constrain detailed cumulative assessment. However, the existence of these projects, and their potential contribution to the evolving concentration of major infrastructure in the locality, is not in dispute. Identifying such schemes within a coherent cumulative framework is necessary in order to understand the cumulative context, even where detailed modelling may not yet be possible. In addition, further project information for LionLink is now available following publication of the LionLink Preliminary

			<p>assessed as part of the cumulative effects assessment with EA1N and EA2, however very little information was available at the time for either development. Lang J concluded that: <i>“I accept the submissions made by the Defendant and the Applicants that the approach taken by the Defendant did not constitute a breach of the EIA Regulations 2017. 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 to the EIA Regulations 2017”</i> And <i>“The two projects were at such an early stage that there was not sufficient reliable information to undertake a satisfactory cumulative assessment. That approach was in accordance with the guidance in Advice Note Seventeen.”</i></p> <p>The reliable information available for the Helios Energy (Solar) Park project is similarly insufficient to allow any level of cumulative assessment. This project will be included in the updated long list of</p>	<p>Environmental Information Report in January 2026. The Examining Authority has therefore required the Applicant to update the Sea Link cumulative impact assessment to reflect this information (EV6-033 Action Point 107). This reinforces SEAS’ point that the cumulative context continues to evolve and cannot be addressed solely by reliance on the application-stage cumulative assessment.</p> <p>The Applicant’s reliance on Planning Inspectorate guidance and the judgment in <i>SASES v Secretary of State</i> does not resolve this issue. That judgment addressed circumstances where extremely limited information was available for the projects in question. The concern raised by SEAS is different: that the cumulative framework for the Application does not adequately reflect the known and evolving suite of overlapping infrastructure proposals affecting the area.</p>
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			developments and will therefore have been considered in the update to the Cumulative Effects Assessment (CEA); however, it is highly unlikely to progress to stage four of the CEA due to a lack of suitable information.	
25	Helios Energy (Solar) Park NSIP	Relying on a generic reference to “the Planning Inspectorate’s advice on cumulative effects assessment” is not a substitute for producing a full, coherent and policy-compliant cumulative impact assessment for this Application. The guidance does not disapply the requirements of the EIA Regulations or NPS EN-1 and EN-5. It does not justify deferring the assessment of known and foreseeable cumulative schemes.	Please see response to point 21 above.	The Applicant’s response simply refers back to its answer to point 21 and therefore does not address the concern raised by SEAS in relation to the Helios Energy (Solar) Park NSIP. As explained in response to point 21 above, the issue raised by SEAS is not whether detailed cumulative modelling can be undertaken where limited project information exists, but whether the cumulative framework for the Application properly reflects the known and evolving suite of overlapping NSIPs and major projects affecting the area. The existence of the Helios Energy (Solar) Park proposal is part of that evolving cumulative context. Simply referring to Planning Inspectorate guidance and deferring consideration on the basis that project details are limited does not demonstrate that the Application includes a coherent and policy-compliant

				cumulative assessment of the cumulative infrastructure context in which the Proposed Project would be delivered.
27	Suffolk County Council Highways A12 improvements	The Applicant's generic "as and when" response does not engage with SEAS's identification of this specific scheme and the ways in which it overlaps spatially and functionally with the Proposals. SEAS is not inviting speculation about unknown development; it is pointing to a defined project that already alters the cumulative context. Reliance on future consideration does not demonstrate that this scheme has been incorporated into a lawful and policy-compliant cumulative assessment for this Application.	Please see response to point 21 above. In addition, we note that the A12 improvements construction peak (early 2027) would not overlap with construction peak of the Suffolk Onshore Scheme (2028). No trips are expected during assessed network or shoulder peaks. Fewer than 30 vehicles per hour during the other hours, based on levels outside of peak months. The forecast daily movements (102) represents a 1% increase through A12/B1121 Main Road (south) junction which has a weekday 12-hour baseline (2028) of 10,204 vehicles. Also, when the A12 works are being carried out, baseline flows on the A12 may be lower (due to potential disruption caused by works), so there could be an overall decrease (rather than increase) on the network at this time.	SEAS identified the Suffolk County Council A12 improvement scheme as a defined project that alters the cumulative context in which the Proposed Project would be delivered. The issue raised was whether this scheme has been incorporated into the cumulative assessment framework for the Application. The Applicant's response instead focuses on a limited traffic comparison, suggesting that the construction peak for the A12 works would not coincide with the peak construction period for the Suffolk Onshore Scheme and that forecast traffic increases would be modest. This does not address the concern raised by SEAS. The question is not solely whether peak traffic flows coincide, but whether the existence of the scheme has been properly incorporated into the cumulative assessment of overlapping infrastructure and construction activity affecting the same area.

				<p>In addition, reliance on the absence of exact peak overlap does not address the potential for sequential or partially overlapping construction activity to affect communities and infrastructure over extended periods. As noted in previous SEAS submissions, cumulative effects may arise from the combined duration and concentration of infrastructure works rather than from a single coincident peak.</p> <p>The Applicant's response therefore does not demonstrate that the A12 improvement scheme has been incorporated into a coherent cumulative framework for the assessment of the Proposed Project.</p>
41	The South Saxmundham Garden Neighbourhood (SSGN)	The Applicant's response to SEAS's points 41–45 repeats the same deferral relied on elsewhere and does not engage with SEAS's point that this is a defined, significant development likely to interact with the Proposals in the same locality. The existence of the South Saxmundham Garden Neighbourhood materially alters the cumulative context. Reliance on APP-060, which is	The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5.	The Applicant's response confirms the concern raised by SEAS. SEAS identified the South Saxmundham Garden Neighbourhood as a defined development in the same locality that has the potential to interact with the Proposed Project and therefore materially alters the cumulative context. The Applicant's response does not explain how this scheme has been incorporated into the

		<p>a static, application-stage cumulative chapter based on an earlier and narrower project set, does not demonstrate that this known scheme has been incorporated into a coherent cumulative framework for this Application.</p>		<p>cumulative framework for the Application. Instead, the Applicant states that it is reviewing planning information and will identify whether updated information changes the findings of the existing cumulative effects assessment at Deadline 5. This acknowledgement indicates that the cumulative project list and assessment remain under review during the course of the Examination. The reliance on the application-stage cumulative assessment presented in the Environmental Statement cumulative chapter [APP-060] therefore does not demonstrate that the South Saxmundham Garden Neighbourhood has been incorporated into a settled and coherent cumulative assessment for the Proposed Project.</p>
46-47	<p>41-housing development at Benhall next to the 9 houses already situated at Shotts Meadow.</p>	<p>The Applicant explains why this land is no longer within the Order Limits, but that is not the entirety of the point SEAS raises. Points 46–47 are also concerned with the fact that a new, consented housing development now exists on land which the Applicant had proposed to use in connection</p>		<p>The Applicant provides no response to this point, and therefore does not address SEAS' concern that the consented housing development at Benhall alters the local and cumulative context of the proposed Bridge works.</p>

		with the Benhall Bridge solution. CR1-052 explains the technical basis for revising the Order Limits, but it does not assess how this additional development alters the local and cumulative context at Benhall, nor how its interaction with the proposed Bridge works will be experienced. The WR point therefore remains unanswered.		
53-54	NG ESO (now NESO) Connections Tec Register and Interconnector Register	SEAS's point is that it has had to rely on the NESO Connections and Interconnector Registers to identify overlapping, sequential and adjacent projects which ought to form part of a lawful cumulative assessment. The Applicant's response – that its cumulative project list in APP-060 was agreed with Suffolk County Council and East Suffolk Council – does not answer that point. Agreement with local authorities does not demonstrate that system-level, nationally significant projects identifiable from NESO registers have been captured,	The fact that a project is listed on the Tec register does not mean there is sufficient information to allow " <i>satisfactory cumulative assessment</i> " to be undertaken and the Applicant refers again to the judgment of Lang J which supports the Applicant's view.	SEAS referred to the NESO Connections and Interconnector Registers as evidence of additional nationally significant infrastructure proposals affecting the same network geography and therefore forming part of the evolving cumulative context. The point raised was not that detailed cumulative modelling should be undertaken in the absence of sufficient project information, but that such projects must be recognised within the cumulative framework used to understand the overall infrastructure landscape. Reliance on the Lang J judgment regarding detailed cumulative assessment does not address this concern.

		nor that the cumulative scope reflects the full and evolving project landscape. The WR concern, that the Application's cumulative framework is incomplete in what it brings into scope, therefore remains unanswered		
55		The Applicant's reliance on future projects to undertake cumulative assessment does not answer SEAS's point. Cumulative assessment cannot operate in only one direction. Where EA1N, EA2 and Sizewell C are consented and LionLink is now a defined NSIP, cumulative assessment with those schemes is capable of being undertaken now. Deferring that task to others does not demonstrate that this Application is supported by a lawful and policy-compliant cumulative impact assessment.	All of the other existing and, or approved developments listed by SEAS are already considered in the inter-project Cumulative Effects Assessment undertaken by the Applicant. The Applicant is currently reviewing the additional information published for LionLink on 13 January to consider whether it changes any of the cumulative effects with the project previously reported.	SEAS' submission was that cumulative assessment with consented projects such as EA1N, EA2 and Sizewell C, and with the now-defined LionLink project, is capable of being undertaken as part of the present Application rather than deferred to future projects. The Applicant refers again to the cumulative assessment presented in the Environmental Statement cumulative chapter [APP-060] and confirms that it is now reviewing the additional information published for LionLink on 13 January 2026. This acknowledgement indicates that the cumulative context continues to evolve and that the application-stage assessment relied upon by the Applicant was undertaken before this further information became available.

				The response therefore does not demonstrate that the Application is supported by a comprehensive and up-to-date cumulative impact assessment of the known infrastructure proposals affecting the area.
57-60	Lime Tree Energy Park - developer BNRG Langmead Ltd Red House Farm – developer Cambridge Power Ltd Manor Farm – developer Qair Renewables UK Ltd	SEAS’s point is that a lawful cumulative assessment begins with accurate identification of the relevant projects. SEAS has demonstrated, using publicly available NESO registers, that additional overlapping and sequential schemes exist which are not captured in the Application’s cumulative scope. The Applicant’s response does not explain why those projects are omitted, nor does it dispute their existence. Even if full evaluation were deferred, failure to identify them at all evidences an incomplete and unreliable cumulative framework. The WR concern therefore remains unanswered.	The cumulative effects assessment was undertaken at a point in time and reflected the information publicly available on other developments at the time the ES was being produced. The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for a development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5. The fact that a project is listed on the Tec register does not mean there is sufficient information to allow “ <i>satisfactory cumulative assessment</i> ” to be undertaken” and the Applicant refers again to the judgment of Lang J which supports the Applicant’s view.	SEAS’ submission was that a lawful cumulative assessment begins with accurate identification of the relevant projects forming part of the cumulative context. Using publicly available NESO Connections and Interconnector Registers, SEAS identified additional overlapping and sequential schemes which were not reflected in the cumulative project scope presented with the Application. The Applicant does not dispute the existence of these projects but instead states that the cumulative assessment represents a point-in-time exercise based on the information available when the Environmental Statement was prepared and that the project list is now being reviewed. This confirms the concern raised by SEAS that the cumulative framework relied upon in the Application does not reflect

			<p>Although these projects may be included in the updated long list of developments and will therefore have been ‘considered’ in the update to the CEA, it is highly unlikely that any will progress to stage four of the CEA due to a lack of suitable information.</p>	<p>the full and evolving project landscape.</p> <p>The Applicant also refers to the absence of sufficient information to undertake detailed cumulative modelling. SEAS’ point is not that detailed stage-four modelling must be undertaken for every project listed on the NESO registers, but that the cumulative framework must first identify the full suite of overlapping infrastructure proposals affecting the area. Failure to identify these projects within the cumulative scope evidences an incomplete cumulative framework.</p> <p>The Applicant’s response therefore does not address SEAS’ concern that the cumulative assessment presented in the Application fails to capture the full set of overlapping and sequential infrastructure proposals affecting the area.</p>
65		<p>The Applicant’s response does not engage with SEAS’s point. A “short list” figure in APP-093 is a static catalogue produced at application stage; it is not an integrated, up-to-date</p>	<p>The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for a development previously</p>	<p>The Applicant’s response does not address the point raised by SEAS. SEAS’ submission was that the cumulative project information presented in the Inter-Project Cumulative Effects Short List [APP-093] represents a static</p>

		<p>cumulative picture of how multiple major schemes overlap geographically and temporally in the same communities. SEAS's Appendix A is provided precisely because the cumulative context has evolved and the Examination now requires a clear, place-based view of that concentration, including schemes such as SWRTS which were not captured when APP-093 was prepared.</p>	<p>identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by deadline 5. The fact that a project has been proposed, such as Suffolk Water Recycling Transfer Scheme (SWRTS), does not mean there is sufficient information to allow "<i>satisfactory cumulative assessment</i>" to be undertaken" and the Applicant refers again to the judgment of Lang J which supports the Applicant's view. Although SWRTS may be included in the updated long list of developments and will therefore have been considered in the update to the CEA, it is highly unlikely that it will progress to stage four of the CEA due to a lack of suitable information.</p>	<p>catalogue prepared at application stage and does not provide an integrated, up-to-date picture of how multiple infrastructure schemes overlap geographically and temporally in the same communities. The Applicant's response confirms that the cumulative project list is now being reviewed and that updated information will be submitted at Deadline 5. This acknowledgement supports SEAS' concern that the cumulative framework relied upon in the Application does not reflect the full and evolving project landscape identified during the Examination. The Applicant also refers to the absence of sufficient information to undertake detailed cumulative modelling for schemes such as the Suffolk Water Recycling Transfer Scheme (SWRTS). SEAS' point is not that detailed modelling must be undertaken where information is limited, but that the cumulative framework must recognise the existence of such schemes in order to understand the overall concentration of infrastructure proposals affecting the area.</p>
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				Accordingly, the Applicant's response does not address SEAS' concern that the cumulative assessment presented in the Application fails to provide a coherent and up-to-date cumulative picture of the infrastructure proposals affecting the locality.
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See Inter-Project Cumulative Effects below.

**SEAS Rebuttals of Applicant's comments (REP4-236 Table 3.2) on SEAS late Deadline 3 submission [REP3-140] – Inter-Project Cumulative Effects**

<b>Ref</b>	<b>Matter</b>	<b>Point Raised</b>	<b>Applicant's Comments</b>	<b>SEAS' Rebuttals</b>
1	Introduction	The Applicant's reference to REP1A-043 does not address the substantive concerns raised in RR-5210. The issues identified by SEAS, understatement of landscape and visual harm, inadequate cumulative assessment, and structural weaknesses in the LVIA remain unresolved.	In light of recent discussions within Issue Specific Hearing 2 (ISH2) and Deadline 4 submissions relating to ISH2 and previous material ( <b>Application Document 9.87 (A) Applicant's Comments on First Written Questions [REP4-083]</b> , <b>Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2 (ISH2) [REP4-094]</b> and <b>Application Document 9.90 (A) Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]</b> ), as well as all previous responses to Landscape and Visual Impact Assessment (LVIA) related submissions made by SEAS, the	The Applicant's response does not engage with the substance of SEAS' point. The references to REP4-083, REP4-094 and REP4-086 simply restate the Applicant's position on the adequacy of the LVIA; they do not address the concerns raised in RR-5210 regarding the understatement of cumulative landscape and visual effects and the structural limitations of the cumulative assessment.  Moreover, following ISH2 the Examining Authority required the Applicant to provide further information relating to cumulative effects and visualisation material (EV6-033). The Applicant's assertion that the matter has already been addressed "in full" is therefore premature while additional cumulative assessment material remains to be submitted and examined.

			Applicant has responded in full. The Applicant refutes that the LVIA is inadequate, understates effects or contains structural weaknesses as suggested by SEAS.	
2	Introduction	The Applicant's position is no longer tenable. NGV's January 2026 statutory consultation documents now provide a defined converter station envelope, indicative engineering layout, architectural massing studies, landscape masterplans, and a cumulative viewpoint sketch showing Sea Link and LionLink together. This directly contradicts	Cumulative visualisations have been prepared with LionLink within Appendix A LionLink Cumulative Visualisations contained within <b>Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific</b>	The Applicant's response refers to the material provided in Appendix A of REP4-086. However, the figures provided do not resolve the issue raised by SEAS. The visualisations consist of simplified block models which do not include key design components such as electrical equipment, structures, overhead wirescapes or landscape mitigation, and do not

		<p>the Applicant’s claim that no usable information exists. Moreover, the Applicant already held sufficient indicative information, block massing from the Sea Link PEIR, footprints in APP-363, and the AS-064 envelopes to produce meaningful cumulative visuals long before NGV’s PEIR.</p> <p>The ExA requested cumulative photomontages, not dotted lines. The continued absence of proper cumulative visualisations remains unjustified and undermines transparent assessment of landscape and visual effects.</p>	<p><b>Hearing 2 (ISH2) [REP4-086].</b> These were informed by the statutory consultation material from LionLink that was published in January 2026 as set out in Appendix A.</p>	<p>provide the level of detail necessary to assess cumulative landscape and visual effects. These shortcomings prevent a meaningful assessment of how the combined Sea Link and LionLink infrastructure would be experienced in the landscape. Given the scale of the proposed infrastructure and the sensitivity of the receiving landscape, this level of visualisation is not sufficient to allow a robust cumulative landscape and visual assessment.</p>
8	<p>Why cumulative visualisations/ photomontages showing the LionLink converter station at Saxmundham are required</p>	<p>SEAS does not agree with the Applicant’s position. The Applicant’s reference back to REP1A-043 does not address the substance of SEAS’s point.</p>		<p>The Applicant has not provided any response to the point raised. SEAS notes that subsequent to this exchange the Applicant provided material described as “LionLink Cumulative Visualisations” within Appendix A of REP4-086. The Examining Authority has required the Applicant to review and update its cumulative effects assessment in light of further LionLink project information (EV6-033 Action Point 107), and the adequacy of cumulative</p>

				visual assessment therefore remains dependent on the further material to be submitted in response to that request.
9	N/A	The Applicant's emphasis on corporate separation does not alter the factual position: National Grid Group plc has already confirmed co-location as the preferred and intended outcome, and both project teams have coordinated siting, layout and design. NGV's January 2026 statutory consultation documents explicitly show the two converter stations positioned together and include coordinated design material. The Applicant cannot rely on corporate separation to downplay co-location when the Group's own published material demonstrates a shared intention and coordinated approach.	Regarding updates on coordination with LionLink, Response to AP125 should be referred to as contained within <b>Application Document 9.90 (A) Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 4 [REP4-086]</b> .	The Applicant's reference to AP125 in REP4-086 does not address the point raised by SEAS. The response indicates that any wider landscape design or cumulative mitigation for the co-located Sea Link and LionLink infrastructure would "more readily be identified and secured by LionLink". LionLink is a separate project which has not yet been consented and may not proceed. It cannot therefore be relied upon to secure mitigation for impacts arising from the Proposed Development. Deferring mitigation for a known cumulative infrastructure cluster to a future and uncertain project does not demonstrate that the cumulative effects of the co-located converter stations have been robustly assessed or mitigated within this Application.
11-14		The Applicant's response does not address the core issue: the	Cumulative visualisations have been prepared with LionLink	The Applicant's response does not engage with the point raised by SEAS. The issue identified by

		<p>Applicant already possessed ample indicative information to produce meaningful cumulative visualisations, just as it did at PEIR stage when it generated block photomontages for three converter stations. APP-363 provides clear indicative footprints, development zones and access arrangements for Sea Link + LionLink, and AS-064 adds further indicative parameters. These materials are no more “illustrative” than the information used to produce the Applicant’s own PEIR block massing. Moreover, NGV’s January 2026 statutory consultation documents now provide defined converter station envelopes, massing studies and a cumulative viewpoint sketch showing both converter stations together. The Applicant’s continued refusal to produce cumulative photomontages is therefore unjustified and leaves a significant gap in the LVIA.</p>	<p>within Appendix A LionLink Cumulative Visualisations contained within <b>Application Document 9.90 (A) Applicant’s Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific National Grid   February 2026   Sea Link Hearing 2 (ISH2) – Deadline 4 [REP4-086]</b>. These were informed by the statutory consultation material from LionLink that was published in January 2026 as set out in Appendix A.</p>	<p>SEAS was that the Applicant had sufficient indicative information available at application stage and during the PEIR process to produce meaningful cumulative visualisations but declined to do so, leaving a material gap in the Landscape and Visual Impact Assessment. The response instead refers to cumulative visualisations now provided in Appendix A of REP4-086 following the Examining Authority’s request at ISH2 (AP109) – see point 2 above. The provision of these late-stage visualisations does not address SEAS’ point that the necessary information to produce cumulative visual material was available earlier in the assessment process. Furthermore, the Examining Authority has required the Applicant to update cumulative assessments and related material in light of the additional information now available for LionLink (AP107). The adequacy of the cumulative visual assessment therefore remains subject to further work to be submitted at Deadline 5.</p>
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15	N/A	While different projects may progress on different timelines, NGV's statutory consultation material is now available, including defined envelopes and indicative layouts.		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.
17-18	N/A	See note 15. The information required to produce meaningful cumulative photomontages now exists, and the ExA's request should therefore be met within the Sea Link examination timetable. .		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.
20	N/A	A procedural gap remains. Whatever the Applicant says about its "need" case, LionLink is central to it, yet the Applicant has not provided the cumulative visuals required to understand the combined effects. NGET's claim at ISH1 that no LionLink model existed is now overtaken by events.		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.
22	N/A	SEAS maintains that the public was asked to engage with Sea Link without access to LionLink's visual or environmental		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.

		information. Now that NGV's statutory consultation material is available, the cumulative visualisations requested by the ExA can and should be produced within the Sea Link examination timetable.		
23-26	Misleading public consultation and visual evidence	SEAS maintains that the public was presented with visuals that excluded LionLink, giving an incomplete picture of the true scale of development.		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.
N/A	N/A	SEAS maintains that the PINS guidance anticipates applicants working with the best information available at the time, including indicative design and location parameters where detailed data is not yet published. In any event, this debate is now academic: NGV's statutory consultation material is available, providing defined envelopes and indicative layouts. The cumulative visualisations requested by the ExA can therefore now be produced within the Sea Link examination timetable.		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.

27-29	Landscape and visual harm from collocated infrastructure	SEAS maintains that the cumulative presence of two converter stations at Saxmundham would industrialise a highly sensitive rural landscape within LCA L1 and adjacent to the Suffolk Coast and Heaths National Landscape. The Applicant's references to earlier documents do not alter this fundamental concern, nor do they address the absence of cumulative visualisations that would allow the ExA and the public to understand the full landscape impact.		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.
37-40	Conclusion	SEAS maintains that the absence of cumulative visualisations remains a serious flaw. The Applicant's reliance on ZTVs and professional judgement cannot substitute for the clear, visual evidence the ExA has explicitly requested. Now that NGV's statutory consultation material is available, including defined envelopes and indicative layouts, there is no remaining barrier to producing meaningful cumulative photomontages. These visuals are essential to understanding the real-world		No response is provided to this point. The concern raised by SEAS therefore remains unaddressed.

		scale and combined landscape effects of two co-located converter stations. SEAS therefore reiterates that the application cannot be properly examined without them, and that revised cumulative visualisations should be required within the Sea Link examination timetable.		
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