



**SEAS D6 RESPONSE to**  
**ISH3, Action Points and ExQ3**

**NOISE**

**PINS Ref:** EN020026  
**DEADLINE 6:** APRIL 13, 2026

**SEAS IP:** [REDACTED]  
**Date:** 13 April 2026

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**Introduction and Overview**

1. This submission addresses the Applicant's Noise assessment, having regard to D5, ISH3, Action Points and ExQ3.
2. SEAS remains concerned that operational noise proposals are unclear and unenforceable, that low-frequency noise has not been properly assessed in this exceptionally quiet area, and that tonal and cumulative effects may cause greater harm than predicted.
3. At ISH3, SEAS acoustic expert Mr Richard Thornely-Taylor suggested that proposed commitments should be enforceable DCO requirements and, on the instruction of SEAS Council, has drafted some requirements in the hope of assisting the Examining Authorities:

**SEAS Proposed DCO Requirements for operational noise drafted by Mr. Rupert Thornely-Taylor**

**“Detailed design parameters**

(X) No stage of Works No. 1B or 3B may commence until written details of the specification of plant, and any noise mitigation proposed in respect of Works No. 1B or 3B together with updated modelling, have been submitted to and approved in writing by the relevant planning authority. Work No. 1B and 3B must thereafter be implemented in accordance with the approved details.

**Control of noise during operation**

(X) The combined noise rating level for the standard operation of Work No. 1B and 3B cumulatively with the operation of other developments detailed in the Inter-Project Cumulative Effects Short List as determined in accordance with BS 4142:2014+A1:2019 shall not exceed 34 dB L<sub>A,r,T</sub> where T=15 minutes at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142:2014+A1:2019.”

4. Set out below is Mr Rupert Thornely-Taylor's written ISH3 evidence :

Sea Link DCO ISH3 26<sup>th</sup> March 2026

Noise evidence of Rupert Thornely-Taylor, Fellow of the Institute of Acoustics

## **10. Noise and vibration**

### **10.1 Construction noise effects and mitigation**

The applicants have not done what the question 2NV4 asked for "*Update REAC [REP4-235] provision NV01 to include reference to securing 10dB reduction from predicted levels, in order to demonstrate that likely significant noise effects and exceedance of the significant observed adverse effect level would be avoided, or explain why this is not necessary.*"

The applicants say that "*construction noise levels....would, however, still be subject to further detailed assessments by the contractor, as per commitment NV03*"

Nothing has been provided to demonstrate that the assumed 10 dB reduction is practicable in every case. The applicant says "*Detailed construction noise assessments have been undertaken for every noise sensitive receptor (NSR) along the Project based on the available information.*" The available information does not include information on the practicability of the assumed mitigation measures.

The Construction Noise and Vibration Management plan relies on a requirement to achieve "Best Practicable Means" and therefore if a mitigation measure capable of achieving a 10dB reduction proves impracticable, the stated results will not be achieved and significant effects will result.

### **10.2 Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable**

In answer to 2NV1 the applicant is adding the commitments quoted below to the REAC. These commitments should be inserted in the DCO as requirements, as was the case in the DCO for East Anglia One North and East Anglia Two, in order that they be readily and directly enforceable.

However, as drafted they are incomplete and lack clarity. Firstly, the value of  $T$  in  $L_{A,T}$  should be expressly stated as 15 minutes, and the result should be for cumulative noise from all developments that may contribute to the predicted level. Secondly it is

necessary to be very specific and not rely on general interpretations of BS4142. BS 4142 is not a precise standard, and two experts, without making any errors, can reach different conclusions from the methodology contained therein. For example, determination of background noise level, when measured values cover a wide range, requires a decision on what is a representative value. It must be borne in mind that background noise levels in this area are exceptionally low, a figure of 16 dBA being reported in the Environmental Statement APP-135 (EN020026-000313-6.3.2.9.A ES Appendix 2.9.A Suffolk Noise Survey Data Table 1.3). That is as low as any I have measured over the past 60 years (and the others were also in East Anglia). BS 4142 offers one possible way of arriving at a representative value (doing a statistical analysis of the results of a statistical analysis), namely the distribution of the 90<sup>th</sup> percentile and picking the mode—the most commonly occurring value), but this is not definitive even though it is often adopted by practitioners as if it were the standard method.

*"For Saxmundham Converter Station (Suffolk) and for Minster Converter and Substation (Kent): During normal operation of the proposed converter station/substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall not exceed 34 dB L<sub>A,r,T</sub> at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.*

*Friston Substation (Suffolk): During normal operation of the proposed substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall be at least 5dB below background noise levels at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (freefield equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142."*

## **Low frequency noise**

The applicants have not addressed the matter of low frequency noise. The applicant stated under Action AP70 *"An assessment of low frequency noise, based on the most up to date level of design detail, will be provided at Deadline 5. The assessment will calculate dBC noise levels at nearby noise sensitive receptors and assess impact by comparison with baseline levels. The dBC index includes a greater proportion of low frequency noise compared with the dBA index, and the assessment will include a comparison between dBA and dBC levels."* This has not been provided.

Document 9.108: Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 5 states "An assessment, incorporating a comparison of A-weighted (dBA)

and C-weighted (dBC) operational sound levels, is provided at Deadline 5 in Appendix D Comparison of dBA and dBC Operational Sound Levels of this document.” The applicants have misunderstood the issue which is that an indicator of the presence of low frequency noise requiring further consideration is obtained from the difference between the C-weighted and A-weighted sound levels (i.e. dBC-dBA). Instead, they have done a different exercise which was to evaluate C-weighted noise against C-weighted background, which does not achieve the same objective.

On the question of constructive interference leading to a combination of two 100Hz sources resulting in a 6dB rather than a 3dB increase, while this was an issue in the EA1N and EA2 examination, I do not have measurement results from another site where this has happened, and it is of particular concern at locations with very low background noise levels where tonal noise is prominent at significant distances. Many other comparable sites are located in areas where background noise levels are higher and this issue is less likely to be a concern.

End