



**SEAS DEADLINE 7 RESPONSE TO APPLICANT'S DEADLINE
6 SUBMISSIONS AND RELATED EXAMINATION MATERIAL.**

**CUMULATIVE IMPACT
(INTER- and INTRA-PROJECT EFFECTS)**

PINS Ref: EN020026
DEADLINE 7: 29 APRIL 2026

SEAS IP: [REDACTED]
Date: 29 APRIL 2026

Introduction and Scope

1. This submission is made by Suffolk Energy Action Solutions (SEAS) in respect of cumulative impact (inter-project and intra-project effects).
2. SEAS relies on and stands by its previous submissions, including its Deadline 6 cumulative impact submission (REP6-256G).
3. This submission:
 - a. identifies matters which remain unresolved at the close of Examination;
 - b. addresses the Applicant's Deadline 6 submissions, including responses to ExQ3 (REP6-111) and associated documents;
 - c. addresses the draft Development Consent Order (dDCO) (REP6-004) and the Examining Authority's (ExA's) Schedule of Changes to dDCO (EN020026-003324); and
 - d. takes into account the Examining Authority's Rule 17 request for further information dated 21 April 2026; and
 - e. reflects the position at the close of the Examination.

Overview: Position at Close of Examination

4. The Applicant's Deadline 6 submissions do not materially alter the position previously identified by SEAS.
5. In particular, at conclusion of the Examination we remain without:
 - a. any integrated cumulative impact assessment across receptors, geography and time;
 - b. any consistent and clearly defined cumulative scenario;
 - c. any demonstration that the mitigation hierarchy has been applied in a cumulative context; or
 - d. any secured mitigation capable of addressing cumulative effects.

6. These matters have been the subject of:
 - a. repeated submissions by SEAS (including REP6-256G);
 - b. questions from the Examining Authority (PD-021 and PD-023); and
 - c. discussion at ISH3 and associated Action Points (EV6-033).
7. Notwithstanding those opportunities, the Applicant's responses to ExQ3 and Deadline 6 submissions do not materially address, still less resolve, these issues.
8. The Examining Authority's Rule 17 letter of 21 April 2026 records that key matters relating to cumulative impact remain unresolved at the close of Examination. In particular, section 16 (Cumulative Impacts) identifies:
 - a. significant intra-project cumulative effects identified by Suffolk County Council (including mental health, public rights of way, landscape and socio-economics);
 - b. unresolved mitigation measures and the need for the Applicant to justify why further mitigation is not required, having regard to the mitigation hierarchy; and
 - c. the identification by the Applicant of potentially significant inter-project cumulative effects for which no further mitigation is proposed.
9. The Examining Authority sought further significant justification on these matters, indicating that the assessment and mitigation of cumulative impacts remains unresolved and under active examination even at Deadline 7 as the Examination reaches its conclusion.

Integrated Cumulative Assessment Remains Absent

10. As set out in REP6-256G, the Application has not provided a coherent, project-wide cumulative impact assessment.
11. The Applicant's Deadline 6 material, including cumulative updates and responses to ExQ3, continues to address cumulative effects within individual environmental topics, rather than through a single integrated framework.
12. This position is unchanged despite repeated requests from SEAS, statutory consultees and the ExA. No Deadline 6 submission provides:
 - a. a unified cumulative baseline;
 - b. a consistent project list applied across topics; or
 - c. an integrated assessment of how effects combine across receptors.
13. The result remains that there is no single cumulative scenario against which impacts and mitigation can be assessed. This lack of integration is reflected in the issues raised by the Examining Authority in Section 16 of the Rule 17 letter, where significant cumulative effects are identified without a corresponding integrated framework for assessment and mitigation.

Cumulative Scenario and Temporal Effects Remain Unresolved

14. The Applicant's cumulative assessment continues to rely on guesswork, in the form of assumed peak overlap scenarios, without demonstrating that these

represent realistic worst-case conditions.

15. The Supplement to the Preliminary Cumulative Highway Impact Assessment (REP6-096) continues to assess cumulative effects based on defined scenario years, rather than testing:
 - a. seasonal variation;
 - b. tourism peaks; or
 - c. sequential and overlapping construction phases.
16. The Rule 17 letter confirms that key aspects of cumulative traffic assessment remain under examination, including:
 - a. the need for sensitivity testing of cumulative impacts (section 7.10);
 - b. unresolved concerns regarding the A12 and wider network (section 7.11); and
 - c. limitations in the scope of assessment raised by Suffolk County Council.
17. These matters go directly to the temporal and spatial definition of cumulative effects, and remain unresolved at the close of Examination.

Inter-Project and Intra-Project Effects Not Assessed Together

18. The Applicant continues to distinguish between inter-project and intra-project effects, but does not provide an assessment that brings these together into a single cumulative framework.
19. Section 16 of the Rule 17 letter highlights both intra-project cumulative effects identified by Suffolk County Council and inter-project cumulative effects identified by the Applicant. However, these are not brought together into a single integrated assessment, nor is there a coherent framework for addressing their combined effects.
20. As a result, intra-project interactions within topics and inter-project cumulative effects are considered separately, without assessment of their combined effect on receptors. This limitation has not been addressed in Deadline 6 submissions and remains a fundamental gap in the assessment.

Receptor-Level Consequences of Cumulative Failure

21. The consequences of this fragmented approach are evident across multiple receptors.
22. For example, in relation to traffic:
 - a. cumulative effects on key routes and junctions remain under examination (Rule 17, section 7); and
 - b. the absence of robust modelling and sensitivity testing means that combined impacts across multiple projects are not understood.
23. In relation to socio-economics and tourism:
 - a. the Rule 17 letter confirms that issues relating to tourism monitoring, mitigation and cumulative effects remain unresolved (section 9); and
 - b. no inter-project cumulative assessment of tourism impacts has been provided.

24. These are not isolated topic issues, but illustrate the systemic consequences of the absence of an integrated cumulative assessment.
25. This is reinforced by the ExA's Rule 17 letter (section 16), which records SCC's identification of significant cumulative (intra-project) effects across a range of receptors.
26. In addition, the Rule 17 letter (section 16) records that in response to ISH3 Action Points, Thanet District Council has stated that it is unable to provide an update on these matters as discussions have yet to take place, indicating that cumulative mitigation measures have not been agreed between the Applicant and relevant authorities.

Mitigation Remains Process-Based and Not Assessed Cumulatively

27. The Applicant continues to rely on:
 - a. outline plans (including the CEMP and CTMTP);
 - b. the REAC (REP6-134); and
 - c. post-consent approval processes under the DCO.
28. As set out in REP6-256G, these mechanisms:
 - a. do not secure defined outcomes;
 - b. are not assessed against a cumulative baseline; and
 - c. depend on future agreement and implementation.
29. The Rule 17 letter reinforces that key mitigation-related matters remain unresolved, including:
 - a. reliance on coordination between projects (section 7.3);
 - b. uncertainty as to effectiveness of monitoring and control mechanisms (section 7.4); and
 - c. the need for additional commitments in relation to tourism and socio-economics (section 9.2).
30. SEAS has provided a separate submission in response to the Applicant's late submission (AS-167), which is not repeated here. In summary, the proposed amendment to the draft DCO would introduce a materially different and unexamined approval regime for the discharge of Requirements, including discretion for the undertaker as to which authority is responsible for that function, without any clear policy or legal basis having been demonstrated. In a cumulative context, where mitigation depends on consistent, locally informed and coordinated decision-making across multiple concurrent projects, this introduces uncertainty into the control framework and further weakens the effectiveness of mitigation measures. As a last-minute and unexamined change to the control regime, and for the reasons set out in SEAS' separate submission on AS-167, the proposed amendment should be given no weight in the assessment of cumulative impacts.
31. In these circumstances, it has not been demonstrated that the mitigation hierarchy has been applied, or can be effectively applied, in a cumulative context.

Coastal Erosion and Cumulative Coastal Processes

32. SEAS relies on its previous submissions including REP4-142 and REP6-256G, regarding coastal processes.
33. The evidence before the Examination indicates that coastal conditions are changing more rapidly than assumed in the Applicant's assessment, calling into question the validity of the baseline used.
34. The interaction of multiple HDD landfalls, cable installations and other coastal interventions introduces cumulative and durational effects that have not been assessed.
35. The Rule 17 letter (section 11.1) raises the need for monitoring of beach profile and erosion rates, and for assessment of the potential for coastal change to lead to cable exposure, confirming that these matters remain unresolved at the close of Examination.
36. In these circumstances, it is not possible to conclude that impacts will be negligible or that mitigation will remain effective over the lifetime of the project.

Comparison with EA1N / EA2 DCP Report Findings

37. The Examining Authority in the East Anglia ONE North and East Anglia TWO projects identified that the cumulative effects of development in this location were substantial, with local harm mitigation 'only just sufficient on balance', and that cumulative effects were 'so substantially adverse that utmost care will be required' in considering further development. There is a clear implication that the Examining Authority anticipated that further projects in the locality would not be consented.
38. SEAS has consistently relied on these findings not as determinative, but as evidence that the Friston–Saxmundham area has already been recognised as highly sensitive to the cumulative delivery of major energy infrastructure.
39. In that context, the addition of further NSIPs requires a comprehensive and integrated cumulative assessment. In contrast, the present Application reaches the close of Examination with significant cumulative effects identified, mitigation measures unresolved or not agreed, and no integrated framework for assessing or managing those effects.

Conclusions

40. The Examination concludes without the Applicant having demonstrated that:
 - a. cumulative impacts are understood;
 - b. a coherent cumulative assessment has been undertaken; or
 - c. mitigation is effective in a cumulative context.

41. The Examining Authority is therefore left without a sufficient evidential basis to assess the likely significant cumulative effects of the Proposed Development.
42. The Rule 17 letter confirms that key elements of the cumulative assessment remain deficient, significant cumulative effects have been identified and that the adequacy of mitigation remains unresolved at a very late stage in the Examination.
43. In these circumstances, and applying the precautionary approach, it is not appropriate to assume that effects will be negligible.
44. SEAS' position remains that the Application is not supported by a lawful or policy-compliant cumulative impact assessment, for the reasons set out in its previous submissions, which remain unresolved.
45. These unresolved deficiencies which go to the heart of any meaningful assessment of cumulative impact, mean in our respectful opinion, that the Examining Authority must give a negative recommendation.

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