

As requested for submissions over 1500 words please find the Summary for SEAS Oral Written Representation on 5 Nov 2025.

Suffolk Energy Action Solutions (SEAS), a community-led organisation supporting the transition to net zero, argues that the proposed Sea Link project is the wrong solution in the wrong place and should be refused in full. SEAS contends that Sea Link is based on outdated design principles, ignores modern offshore technologies, and has failed to justify its need, its site selection, or its substantial environmental and community impacts. The group points to more advanced and less harmful international models that prioritise offshore integration, brownfield sites, and strategic planning, none of which have been applied here. SEAS argues that National Grid's evidence base is incomplete, its surveys flawed, and its assessments of alternatives and cumulative impacts—particularly alongside Sizewell C, EA1N, EA2 and LionLink—superficial and inadequate. Taken together, the project's unproven need, unnecessary onshore harm, disregard for viable alternatives, and unacceptable cumulative burden on Suffolk's landscape, economy, and wellbeing render the proposal unjustifiable and unconsentable.



SUFFOLK ENERGY ACTION SOLUTIONS (SEAS)
WRITTEN REPRESENTATION of SEAS
ORAL REPRESENTATION by FIONA GILMORE
SEA LINK DCO

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Introduction

Good afternoon to all the Examining Authority Panel. Thank you for the opportunity to speak. My name is Fiona Gilmore, and I am a founder of Suffolk Energy Action Solutions – SEAS.

I will first tell you about SEAS and why we are participating in this Examination, second briefly address design principles and cumulative impact (these and other matters will be addressed at more technical level at the ISHs) and third offer a conclusion.

In short, we say this is the wrong project at the wrong place at the wrong time. We will develop and make good these points during the course of the examination with assistance from experts and counsel. Mindful of the 6 minutes for now I will simply give an overview of a part of our case that the application should be refused in its entirety.

Suffolk Energy Action Solutions (SEAS)

We are a community-led, research-driven organisation that enthusiastically supports the UK's transition to net zero, but believes it must and can be delivered in a way that is fit for the 21st century, maximising cost- efficiency, and environmental responsibility, and that the harm that Sea Link will cause cannot be justified. We are volunteers, representing thousands of people, we have given up a lot of time to understand these Proposals and to explore alternative modern solutions. Why have we done this? Because we care about our legacy to future generations, our wetlands, our flourishing tourism sector and the wellbeing of our communities and the more we investigated, the more obvious it became that these Proposals cannot be justified on their own terms, and that the unjustifiable harm they would cause is

because they were conceived in a previous era since when technology and objectives have changed dramatically - yet these plans have been stuck, mired in the outdated world of onshore radial connections with landfalls splattered along the entire coast, a world devoid of a master plan for energy infrastructure and where design principles are non-existent.

Why is SEAS participating in this examination?

Faced with the great harm that Sea Link will cause, on its own and in cumulation with other projects, we asked ourselves – is this necessary? It turns out the answer is no, on two levels – the more micro level of Sea Link on its own terms, and the macro level too. I want to say something first about the macro level, because it has such valid lessons in terms of design principles, before consideration of Sea Link specifically.

Macro and design principles

Over the past six years, SEAS has consulted engineers, economists and planners across North Sea countries to understand how major transmission infrastructure can be delivered efficiently and responsibly, reducing onshore infrastructure by as much as 50%. Belgium and the Netherlands pool energy at sea in an integrated way wherever possible and use brownfield sites at industrial zones such as Rotterdam and Zeebrugge for their energy infrastructure hubs. Their projects do not result in egregious damage to the natural environment and do not find themselves facing – 6,000 odd relevant representations? - and bogged down in lengthy arguments and judicial reviews - no doubt because they avoid building energy hubs in tourism nature hot spots and they consult collaboratively with communities at the outset.

The design principles applied by these other North Sea countries: use brownfield sites wherever possible; bring power directly to where it is needed near centres of demand; and pool offshore wind energy at sea, transmitting it via integrated subsea HVDC cables (Modular Offshore Grids: MOGs) rather than carving multiple cable routes through rural areas where tourism is the major revenue earner for local businesses.

Offshore converters are being implemented as we speak, in Germany and the UK's SPR EA3. Yes. ScottishPower is using an offshore converter for a neighbouring project.

We know from discussions with developers that SPR EA1N and EA2 can be pooled with LionLink at sea and that this electricity can be transmitted via these modern offshore converters. They have no need of onshore converters and individual substations at Saxmundham and Friston, which are acknowledged universally to be outdated, inefficient point to point solutions.

The current NSIP system gives developers enormous power to determine the destiny of communities and ecologies. As a SPR engineer declared at the SPR EA1N and EA2 Hearings: "our brief is to dump our boxes (substations) wherever is the cheapest short-term option available which is the shortest distance from windfarm to connection". That modus operandi is no longer sustainable and is not even technically valid given the advent of HVDC cables which are cheaper the longer the distance.

Sea Link, as proposed, has been tagged on to this outdated, debunked system.

It is an expensive component of a fragmented, piecemeal network that multiplies onshore impacts without proving clear need or demonstrating that alternatives have been properly assessed.

However, as I will now explain, not only does Sea Link fail these basic design principles, Sea Link cannot justify itself even on its own terms. During the hearing we will with assistance from counsel and experts address (i) the needs case, (ii) site selection, (iii) alternative technology, (iv) rule 9 letter sleight of hand, (v) demonstrable and fundamental flaws in surveys relied upon by National Grid and (vi) cumulative impact.

1. Needs case

Sea Link's Needs Case is fundamentally flawed. National Grid has not demonstrated that this project is required on the timescale claimed or that it represents the best use of public and consumer funds.

The company's modelling relies on out-of-date assumptions about generation and demand patterns from the early East Anglia studies — studies that pre-date Sizewell C delays, the upgrade review of offshore wind targets and the accelerated roll-out of HVDC technology, and the change of Nautilus' connection site to Grain. National Grid presents Sea Link as an urgent necessity when the evidence shows there is time to design better solutions that deliver significant cost savings, as well as socio-economic and environmental benefits.

Sea Link has been described as the “missing link”, but National Grid has never shown what specific generation it will carry or how it fits within a clearly-modelled future network. There is no transparent system analysis of alternative HVDC paths or demand-side reinforcement. The Needs Case rests on assertion, not evidence.

SEAS therefore urges the Examining Authority to find that the project fails the basic test under EN-1 and EN-5: that a proposal must be demonstrably necessary and proportionate to its claimed purpose. Until a credible, transparent strategic assessment is produced, this DCO application can surely not be recommended for consent.

2. Alternative Sites and Alternative technology

National Grid has not demonstrated that Saxmundham is the only, or the best, location for a converter station of this scale.

Viable brownfield or semi-industrial sites closer to existing grid infrastructure were screened out too early, often for reasons that were subjective, inconsistent, or simply unexplained.

By contrast, the chosen rural site located adjacent to world acclaimed bird sanctuaries and vital lowland wetlands cause extensive loss of farmland, severe

landscape and ecological harm and displacement, and extreme upheaval to nearby communities — including an unsound and disruptive logistics route through Benhall and Saxmundham that National Grid is now trying to fix through late “non-material” changes.

Crucially, offshore innovations — including options for offshore converter platforms and direct HVDC connection to more suitable inland or brownfield substations closer to demand such as Isle of Grain, West Grain, Bradwell, Thames Gateway — were dismissed without ROBUST AND TRANSPARENT comparative analysis. These options could have avoided almost all onshore impacts. SEAS will be presenting some of these options at the Issue Specific Hearings.

The Alternative Sites assessment therefore fails the policy test under EN-1 and EN-5, which require clear justification where a project imposes greater environmental or community harm than reasonable alternatives. Until a credible, transparent assessment of alternative locations and routes is produced, consent CAN SURELY NOT be granted.

3. Flawed Surveys

The examination is being asked to assess a project whose evidence base is INADEQUATE and incomplete.

Key surveys have either not been carried out, are ongoing, or were based on outdated or irrelevant data, e.g. the traffic assessments fail to factor in realistic seasonal peak conditions and exclude inevitable cumulative project congestion. National Grid have made no material response to ExA’s request on this matter or on inadequate Ecology surveys again carried out in the wrong season as pointed out by Kent Wildlife Trust and SEAS. Traffic congestion is a major deterrent for day visitors. Over 90% of visitors to Aldeburgh, Walberswick and the region are day visitors. According to independent research, they will increasingly go elsewhere to more attractive places where ease of access is more certain.

Tourism visitor attitudes have not been explored by National Grid. Independent quantified studies have been conducted on behalf of the Destination Management Organisation, indicating a reduction of visitors as a result of these cumulative

projects leading to at least 17% loss in revenues resulting in at least £0.5 billion loss to local businesses. The loss of livelihoods and the closure of local businesses will have a domino effect. Tourism and hospitality decline will impact many other economic sectors which are dependent on buoyant tourism.

Several issues including groundwater, drainage, ecology, and construction access have been perfunctorily addressed - National Grid has acknowledged gaps or committed only to future “further surveys”. That means the application cannot be properly tested during this examination.

Such omissions are contrary to the principle of front-loaded meaningful assessment required by the Planning Act. The ExA cannot make a sound recommendation when essential baseline evidence is missing.

3. Cumulative Impact

A glaring flaw in this application is its treatment of cumulative impact.

Sea Link has been assessed as if there was no need to really get to grips with the surrounding projects — Sizewell C, EA1N, EA2, and now LionLink — as well as the many non-NSIP projects, including applications of major development that have nothing to do with the energy projects but which all add their cumulative impacts to the pile. Yet for the communities of East Suffolk, these schemes overlap in time, in geography (the epicentre being five square miles) and in consequence.

Each energy project brings its own road closures, HGV movements, land grab, loss of amenities and construction disturbance. Together, they create a level of disruption that no single Environmental Statement has yet captured or acknowledged. The scale of disruption is disproportionate and unreasonable for any rural region to accept but in particular a uniquely popular destination attracting food and drink producers, ornithologists, ramblers, cyclists, Duke of Edinburgh Award students, beach lovers and day visitors. The concept of “escaping to the country” as the BBC programme implies is to get away from the stresses of urban and industrial life to immerse oneself in tranquillity and beauty of the wilderness. These developer plans will destroy that essential character. The spirit of the place will be changed for ever. This is an existential threat.

National Grid's cumulative assessment is superficial and incomplete. It downplays overlapping phases, and fails to address combined effects on our rural road infrastructure, traffic, tourism, ecology, landscape, noise, flood risk, and wellbeing. By way of example (and we will highlight many more in the ISHs) SZC was acknowledged as a "known major project" but its construction effects were not combined with Sea Link's expected construction traffic, workforce demand, noise, landscape impacts. Instead, Sea Link treated SZC as if its peak traffic and disturbance would NOT overlap – which is not supported by SZC's own schedule. EA1N and EA2 were referenced only as consented projects, but Sea Link did not assess:

- Combined construction haul roads

- Combined landscape /visual receptor impacts

- Combined noise and health effects

- Competing demands on temporary accommodation, labour, materials, or local transport

- LionLink was dismissed entirely from cumulative assessment on the grounds that "it was not sufficiently defined".

This is despite the fact that:

- LionLink's landing zone, converter station zone and cable corridor footprint were publicly identified in the Holistic Network Design (2022)

- National Grid themselves used LionLink in their own Needs case justification for Sea Link and Lion Link consultation is now on foot

This approach is inconsistent with EN-1 and EN-3, which require significant cumulative effects to be assessed transparently and mitigated. National Grid's approach is termed as "cherry picking, "card stacking" or bluntly "fallacy of incomplete evidence".

Not that there can be any meaningful mitigation for the permanent blight, loss of peace and wellbeing and seismic shift in the essential character of this region from a coastal haven to a semi- industrial zone. You just need to see the numerous road closures to gain a glimpse of what is only the start of this onslaught. How does one fairly quantify the mitigation value of the tourism lost earnings let alone all those

other important aspects of life: loss of wellbeing and loss of wildlife corridors for which there's no price tag?

The adverse cumulative impacts of these combined projects risk overwhelming the very communities being asked or instructed to host.

SEAS therefore urges the Examining Authority to find that the cumulative impacts of Sea Link and other projects render these proposals unacceptable.

Conclusion

In closing, SEAS supports a strong, reliable offshore-onshore energy transmission network — but one that is planned using holistic network design criteria, verified and endorsed with relevant and adequate surveys and delivered with fairness. Sea Link fails those tests.

Its need has not been proven. Its site selection was biased and incomplete. Its surveys are inadequate. And its cumulative impacts on Suffolk's communities and environment have not been properly assessed and are clearly too great a burden for this small area.

This DCO application represents a piecemeal, outdated approach that the Planning Act and National Policy Statements were never intended to authorise.

We therefore respectfully urge the Examining Authority not to recommend consent for a project built on flawed evidence and without any robust spatial energy planning.

End

CUMULATIVE IMPACT MAP

COASTAL SUFFOLK

This map shows the cumulative impact of multiple offshore wind farm projects with approximate site locations of potential cable routes and converter station locations for **National Grid's LionLink** and **Sea Link** interconnectors, **Scottish Power Renewables (SPR)** cable routes together with the proposed **Sizewell C Nuclear Power Station**, **ESW Recycling, Transfer & Storage Project**

