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The Sea Link Examining Authority
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

9 December, 2025
Your Ref: EN020026
SEAS IP: [REDACTED]

Dear Sarah Holmes and Inspectorate team,

**RE: SEAS COVER LETTER FOR, AND EXECUTIVE SUMMARY OF, DEADLINE 2
SUBMISSIONS – Sea Link (EN020026)**

1. Introduction

Suffolk Energy Action Solutions (SEAS) is seriously concerned by the Applicant's response ([REP1A-043](#), 1 December 2025) to our Relevant Representations ([RR-5210](#) and [AS-038](#), 23 June 2025). The Applicant's approach is inadequate both substantively and procedurally. NGET repeatedly defaults to the assertions in its original application documents—documents which SEAS has demonstrated contain outdated modelling, factual inaccuracies, material omissions, and a flawed needs and alternatives case—treating them as authoritative rather than subject to scrutiny.

There is little if any new evidence, just referencing back, or re-presentation of the same material (or in the case of the need case, an unjustified and rather desperate attempt to claim a different case has been in place all along, and even then, the new case does not stand scrutiny).

What new "evidence" there is does not plug the gaps (e.g. what is presented as a traffic cumulative assessment lacks the necessarily cumulative modelling/quantitative assessment and, regrettably, is simply a lengthy exercise in textual description badged as "assessment", without substance).

In addition, the so-called "thematic" grouping of responses, in which the Applicant aggregates the concerns of public bodies, expert organisations, and individual stakeholders into generic replies to which it refers back when addressing individual RRs, is inappropriate and dismissive. This method prevents transparent engagement with specific points raised by Interested Parties and undermines the purpose of the DCO examination process.

Finally, SEAS is compelled to highlight the wider procedural shortcomings that now characterise the Sea Link DCO process. These include:

- **The Applicant's repeated late submissions**, leaving insufficient time for scrutiny;
- **Missing or incomplete baseline data from the Applicant** across multiple environmental and technical assessments;
- **Material factual inaccuracies**, including in the (crucial) Needs Case (but not only there);
- **Deficient consultation**, failing to meet the standard required under the Planning Act 2008; and
- **A late and significant DCO Change Application**, submitted only after the close of Relevant Representations, which itself demonstrates the flaws in the Applicant's evidence, its case, and its approach overall.

Taken together, these shortcomings indicate that the Application **continues to fall below the statutory requirements** of the Planning Act 2008 or the EIA Regulations 2017 for a legally sound, transparent, and evidence-based examination.

2. Rebuttal of REP1A-043 (Sections 6–9.34.1)

SEAS submits further written evidence (see list of documents appended at the foot of this covering letter/executive summary) at Deadline 2 to assist the Examining Authority in identifying the core issues that remain unresolved. Despite the Applicant's assertion that concerns have been addressed, material deficiencies persist in every major area of the Application.

In particular, SEAS highlights that:

- **The Needs Case is no longer factually correct, has fallen away** and does not reflect the current or future system configuration. This was already the case when the Application was submitted, due to the removal and then cancellation of Nautilus, but the Applicant has compounded its failure to acknowledge the removal of its Need Case at the time it submitted the Application, by now asserting its Need Case *'is not changed by the exclusion of Nautilus from the Sizewell Generation Group'*. This flies in the face of reality.
- **The strategic justification originally relied upon has dissolved**, given the relocation and then cancellation of Nautilus, the ability to (comfortably) meet any remaining "worst case fault" transmission capability gap (352MW even if LionLink comes to Sizewell area, which it ought not) by cheap and environmentally light-touch upgrading of existing infrastructure, and the fact of other now consented grid upgrades in East Anglia.
- **The inadequacies identified by SEAS across the various ES topic areas remain**, and even on the rare occasions where the Applicant has provided some further evidence, rather than repackaging or referencing the inadequate existing evidence, it fails to plug the gap (e.g. regarding heritage, by its Appendix A, or its attempts at Appendix B to dismiss RAF

Leiston as not previously development based on a NPPF policy test that is concerned with Green Belt, ignoring the previously developed reality).

- **Cumulative impact assessment remains missing**, despite the Applicant's claims to the contrary, what is needed is substantive assessment, with necessary quantitative modelling, not least of such as cumulative traffic/transport impacts, along with their effects on tourism and the local economy, as well as the range of environmental issues, from landscape/visual impact, to noise, air quality, water/flooding etc.
- **Reasonable brownfield and grid-optimised alternatives have not been lawfully assessed**, contrary to EN-1, EN-5, and the EIA Regulations. Its Need Case set out in APP-320 having fallen away, it was incumbent on the Applicant to revisit the reasonable alternatives exercise, and at the macro level, as SEAS has explained: with no need for a "sea link" connecting at Sizewell, other options, not least better placed brownfield closer to demand to take any (if any) excess from Kent should have been carefully explored. Even in the fictional world in which the Applicant's APP-320 Need Case remains, the Applicant's Appendix B attempts to justify its preference for Saxmundham over Leiston hold no water.
- **The Applicant continues to rely on outdated modelling and cost bases**, preventing a lawful application of the s.104(7) planning balance and undermining the credibility of its conclusions. It is plain, despite the Applicant's careful language, that the costs of these Proposals are vastly in excess of the outdated figures the Applicant has quoted in the Application documents.
- **The evidence (and lack of evidence) continues to show that the Proposals do not comply with National Policy Statement requirements**, nor with NGET's statutory duties under the Electricity Act 1989, particularly the duty to develop an efficient, coordinated, and economical system of electricity transmission.

Despite repeated concerns raised by SEAS and numerous stakeholders, the Applicant's responses remain generalised, unsubstantiated, and unjustifiably dismissive. NGET has failed to engage with the evidence presented, despite the volume of its responses, and in where it has ventured to add argument it is contradicted by its own documentation or by publicly available system planning data.

To support a transparent and rigorous examination, SEAS provides detailed, point-by-point rebuttals of the Applicant's responses across all topic areas (see list of what is appended at the food of this document). These include need, alternatives, environmental, technical, heritage, socio-economic, cumulative effects, and community-impact matters.

3. Conclusion

SEAS submits that the Sea Link application, as currently presented, is procedurally flawed, substantively deficient, and unsupported by an up-to-date or legally robust needs or alternatives case. The Applicant has not met its statutory obligations, and the material before the Examination

does not provide the necessary foundation for the Secretary of State to make a lawful decision, let alone to grant the DCO sought.

We trust that these Deadline 2 submissions will assist the Examining Authority in carrying out a thorough evaluation of the evidence. SEAS remains available to provide further clarification, written submissions, or oral representations as required.

Thank you for your continued consideration.

Yours faithfully

Suffolk Energy Action Solutions (SEAS)

APPENDED TO/ACCOMPANY THIS COVERING LETTER/EXECUTIVE SUMMARY

SEAS Deadline 2 submissions – 9 December 2025

The individual submissions at Deadline 2 for each of the following topics constitutes the formal response from SEAS to the Applicant's Response ([REP1A-043](#)), (or REP1-111)] to SEAS Relevant Representations [[RR-5210](#)] and [[AS-038](#)]. They have been submitted via 'Have your Say' portal.

PART 1 – SUFFOLK NEEDS AND ALTERNATIVES TOPICS

- A. Needs Case
- B. Alternatives Case

PART 2 - SUFFOLK SPECIFIC-EFFECT TOPICS

- 1. Landscape & Visual
- 2. Ecology & Biodiversity
- 3. Cultural Heritage
- 4. Water Environment
- 5. Geology and Hydrogeology
- 6. Agriculture & Soils
- 7. Traffic & Transport
- 8. Air Quality
- 9. Noise & Vibration
- 10. Socio-Economics, Recreation & Tourism
- 11. Health & Wellbeing
- 12/13. Cumulative Effects Intra & Inter Project