

**SEAS WRITTEN REPRESENTATION OF THEIR**  
**ISH2 ORAL REPRESENTATION on**  
**COASTAL EROSION**

**SEA LINK: EN020026**  
**DEADLINE: 4 – 10 February 2026**

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This document constitutes SEAS oral representation at ISH2 on Sea Link Coastal Erosion

## **1. Introduction**

### **Coastal Erosion and Energy Infrastructure on the Suffolk Coast – A Local Perspective**

This is the written follow up to speaking at the ISH 2, day 2 session 3. I'm Lynne Walker, speaking both as a member of the SEAS team and as a local resident who has been closely following what is happening along the Suffolk coast, particularly around Walberswick, Thorpeness, Aldeburgh and Sizewell. What we are seeing on the ground now matters directly to how major energy infrastructure projects – but specifically Sea Link – should be assessed.

#### **What We Are Asking For**

Given the pace and scale of change now being observed, we are asking for three straightforward and reasonable steps:

1. **An urgent site inspection** by the Examining Authority, so current conditions can be seen first-hand
2. **New, climate-informed surveys** for Sea Link and all other current and proposed energy projects, carried out now – not after consent
3. **A proper reassessment of coastal erosion risk**, including quantified projections over the lifetime of the project, secured monitoring, and clear responsibility if things go wrong.

Climate change here is not some future risk. It is already reshaping this coastline. Sea-level rise, storm surges and increasingly severe storms are accelerating erosion at a pace that is far beyond what many existing surveys predicted. Conditions have changed materially since much of the baseline work for Sea Link and other projects was carried out. That is why we believe the current assessment framework is no longer adequate.

## **2. What's Happening on the Ground Now**

The most dramatic changes are happening at Thorpeness. Cliff erosion has accelerated sharply because the ground is saturated, making it extremely friable and prone to sudden collapse. The Red House on North End Avenue was lost several years ago, and in just the

past few weeks three more houses have been demolished following Storms Bram, Goretti and Chandra. Five flats are being demolished this week, with more properties expected to follow which the shocking feature on national BBC 6pm News on Tuesday 27<sup>th</sup> January served to illustrate.



<https://www.youtube.com/shorts/EVb5gsDrb1g?feature=share>

The above short montage of drone footage from BBC Politics East 1/2/26, shows the physical changes being wrought and confirms that around 27 metres of cliff have been lost in just two years, compared with earlier predictions of around 2 metres. At this rate, Thorpeness village faces a very real and imminent risk of flooding.

Along the wider coast, recent storms have stripped beaches back to levels many residents have never seen before. In places like Aldeburgh, historic gabions that had been buried for decades are now exposed. There is no guarantee that the shingle will return, and permanent sediment loss becomes more likely with every major storm.

This matters because beaches and sediment movement are not just scenery – they are part of the coast's natural defence system. Once they are destabilised, erosion can accelerate very quickly.

### **3. Why This Matters for Sea Link and Other Energy Projects**

This rapidly changing coastline is the setting for several major energy schemes: Sizewell C, Sea Link, SPR and potentially LionLink. These projects involve horizontal directional drilling, onshore and offshore cabling, and works beneath beaches, cliffs and sensitive conservation areas.

The proposed Sea Link landfall sits on a coastline that is already acknowledged by the Applicant to be highly sensitive and actively eroding. Their own data shows a long-term net loss of beach since the early 1990s, with accelerated erosion between 2016 and 2021 in the Thorpeness–Aldeburgh area.

Despite this, the Applicant repeatedly concludes that erosion impacts will be “negligible”, largely on the basis that the area affected is small and that natural processes will quickly restore equilibrium.

From a local perspective, that argument simply doesn’t reflect reality. A highly dynamic coastline is not a resilient one. It is often closer to tipping points, where relatively small interventions can trigger disproportionate and sometimes irreversible change – especially during storm events.

#### **4. Burial Depth, Exposure Risk and Real-World Experience**

The Applicant places a lot of confidence in burial depth and design standards. However, there is a clear local precedent that undermines this reassurance.

In October 2018, a fibre-optic telecommunications cable installed north of Thorpeness – buried well below the beach by an experienced international contractor – became fully exposed overnight following high winds and tides. This happened less than a decade after installation and demonstrates that burial depth alone is not a reliable safeguard on this stretch of coast. Extreme but entirely foreseeable conditions can rapidly undermine design assumptions and yet this precedent is not meaningfully addressed in the Sea Link assessment.

No specific meter-by-meter burial depths are currently fixed. The applicant states that “as it stands, our assessment offshore, we haven’t finalized specific depths because they are subject to the CBRA and detailed design”. NGET argues that “monitoring plans” and final depth assessments are usually deferred until a contractor is appointed, which SEAS and other parties challenge as being “too late” for the examination. In our view this deprives the ExA of the ability to assess the environmental impact of that depth (e.g. sediment disturbance or “frac-out” risk) before the DCO is granted.

Horizontal Directional Drilling (HDD) will be used to install the cables deep beneath the beach and intertidal area. The cables are intended to pass “deep beneath the shoreline” to avoid surface impacts and ensure the infrastructure remains unaffected by coastal erosion over its lifetime. NGET argues that burial via HDD is a mitigation measure against erosion. However, documents like APP-339 (p. 23) admit that “ground strength” dictates burial depth. As illustrated in points above SEAS argue that recent events show ground strength as being highly unstable.

\*See Appendix below regarding examples of cable burial agreed parameters.

#### **5. Sediment Movement and Wider Knock-On Effects**

Longshore sediment transport along this frontage is critical. It helps maintain beach levels, protects settlements, and supports sensitive habitats such as the RSPB North Warren and Hazlewood Marshes.

Those marshes have already been breached by storm surges, converting freshwater habitat into saltmarsh and increasing inland flood risk. Further breaches could have serious

ecological consequences and could leave Aldeburgh effectively cut off far sooner than previously anticipated.

Any intervention that alters sediment pathways – even if the physical footprint seems small – risks knock-on effects well beyond the immediate landfall area. Yet there is no conservative, quantified modelling showing how sediment transport might be affected under storm conditions or over the lifetime of the project.

## **6. Monitoring, Mitigation and Responsibility**

Despite acknowledging that this is a highly sensitive and eroding coastline, the Applicant has not secured:

- Long-term beach profile monitoring at the landfall
- Clear trigger points for intervention if erosion accelerates
- Transparent reporting arrangements
- A clear liability framework if cables become exposed or erosion is worsened

Short-term construction monitoring is not enough for infrastructure expected to operate for decades in a rapidly changing coastal environment. Deferring these issues to post-consent plans does not give confidence that risks are being properly managed.

SEAS challenge whether NGET has modelled the predicted erosion profile against the technical burial limits for the full 40–60 year lifespan of the project

## **7. Policy, Precaution and the Burden of Proof**

National policy is clear. Where environments are sensitive and impacts may be irreversible, applicants are expected to assess risks conservatively, address uncertainty transparently, and apply the precautionary principle.

In this case:

- Erosion risk is acknowledged but consistently downplayed
- Key uncertainties are deferred rather than resolved
- Worst-case and lifetime scenarios are not meaningfully explored
- Assertions are repeated without new evidence

Simply stating that impacts will be negligible does not make them so. Ultimately, it may be climate change itself that determines whether this location is suitable for this kind of infrastructure at all.

## **8. In Conclusion**

The evidence shows that the proposed Sea Link landfall would be built on a coastline that is already eroding, highly sensitive and changing faster than previous assessments anticipated. Relying on outdated surveys, qualitative assurances and post-consent fixes does not meet the standards required for nationally significant infrastructure in such a setting.

For these reasons, coastal erosion alone weighs heavily against granting Development Consent as things currently stand.

END

## Appendix 1

### Other project examples relating to cable burial:

- **Sheringham Shoal and Dudgeon Extension (SEP/DEP):** Unlike Sea Link, this project submitted a **Detailed Export Cable Burial Risk Assessment** during the examination phase (PINS Doc 9.7.2). They explicitly proposed a target "depth of lowering" of **1.0m**, or **0.6m** in chalk, rather than deferring the figure to post-consent. <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010109-000217-9.7.2%20Export%20Cable%20Burial%20Risk%20Assessment.pdf>
- **East Anglia ONE North (EA1N):** At the Thorpeness landfall, the applicant committed to a specific **HDD entry pit setback of 85m from the cliff top** to allow for natural coastal erosion over the project's life. NGET's current documents (like **AS-127**) are less specific about these setback distances and how they correlate to burial depth – seems important given recent Thorpeness events, original 2020 doc [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-002599-ExAAS2D1V1EA1NOutlineLandfallConstructionMethodStatement\\_378408\\_1.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-002599-ExAAS2D1V1EA1NOutlineLandfallConstructionMethodStatement_378408_1.pdf)

2021 update to EA2N doc [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-005394-ExA.AS-1.D12.V4%20EA1N%20Outline%20Landfall%20Construction%20Method%20Statement%20\(Tracked\).pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-005394-ExA.AS-1.D12.V4%20EA1N%20Outline%20Landfall%20Construction%20Method%20Statement%20(Tracked).pdf)