

From: [REDACTED]
To: [South East Anglia Link](#)
Cc: [REDACTED]
Subject: Sea Link DCO Examinations Deadline 7 submission from Fiona Gilmore
Date: 29 April 2026 23:59:22

Re: [REDACTED]

Dear Planning Inspectors

Thank you for considering our submissions as part of the Examination process.

First, I write to object in the strongest possible terms to the Applicant's proposal identified as AS-167.

This proposal by National Grid Electricity Transmission is to transfer responsibility for discharging Development Consent Order (DCO) Requirements from Suffolk local authorities to an unspecified future unit within the Department for Energy Security and Net Zero (DESNZ). The objection is advanced on the following grounds:

1. Late and Procedurally Unfair Introduction

- AS-167 was introduced at a very late stage in the Examination, denying Interested Parties a proper opportunity to scrutinise and respond to its implications.
- No meaningful consultation has taken place on this fundamental governance change, and it has not been tested through hearings or evidence, undermining the integrity of the Examination.

2. Erosion of Local Democratic Accountability

- The current regime correctly assigns Requirement discharge to local authorities, who possess detailed local knowledge, are democratically accountable to affected communities, and provide an essential check on major infrastructure delivery.
- AS-167 strips those authorities of decision-making power, reducing them to mere consultees in a process controlled by a remote, centralised body — a clear departure from the democratic principles underpinning the Planning Act 2008.

3. Legal Uncertainty and Absence of Safeguards

- The proposed DESNZ unit does not yet exist. Its statutory basis, legal powers, governance structure, decision-making procedures, timelines, and appeal mechanisms are entirely undefined.

- Granting consent on this basis is contrary to the requirement for robust, enforceable, and clearly defined DCO controls. Such legal vagueness would expose the consent to challenge and could render Requirements unenforceable in practice.

4. Risk to Effective Oversight and Mitigation

- Removing local authority oversight risks weaker scrutiny of detailed design, construction impacts, ecological effects, and traffic management — precisely the matters where local expertise is most critical in a project of this scale in Suffolk.
- Commitments given during the Examination may not be properly implemented or enforced without meaningful local involvement in their discharge.

5. No Evidence of Need or Justification

- The Applicant has provided no evidence that the existing system is inadequate, that local authorities are incapable, or that the proposed alternative would deliver better outcomes. The proposal appears designed to reduce local scrutiny, not improve it.

6. Concerns of national significance

- **Incompatibility with the Levelling-Up in and Regeneration Act 2023 agenda:** Government policy has consistently emphasised the importance of local decision-making in planning. AS-167 runs directly counter to this direction, concentrating power in central government at a time when policy ostensibly moves the other way.
- **Human rights and access to justice:** Replacing a local authority decision-maker — against whose decisions statutory appeal rights exist — with an undefined central body raises serious concerns under Article 6 ECHR (right to a fair hearing) and the principle of access to justice.
- **Dangerous precedent for NSIPs nationally:** If accepted, AS-167 signals to all future Nationally Significant Infrastructure Project applicants that governance arrangements can be restructured late in an Examination to sideline local authorities, fundamentally undermining confidence in the DCO regime.
- **Disproportionate impact on host communities:** The communities of Suffolk and Kent bear the greatest burden of construction and operational impacts from Sea Link. It is unjust and disproportionate that they should simultaneously lose the local democratic oversight mechanisms intended to protect their interests. Whilst this is specifically an issue for both Suffolk and Kent, the consequences of this material change will cause a ripple effect nationally. Questions will be raised as to how a Government can allow a developer National Grid plc to hijack so much control over projects which require local Council leadership to ensure that local knowledge of sensitive receptors and community concerns are addressed properly.

Conclusion

AS-167 is a material, unjustified, and procedurally unfair late change that erodes local democratic accountability, introduces unacceptable legal

uncertainty, and sets a damaging precedent. The Examining Authority is respectfully requested to recommend that AS-167 be rejected in full.

My submission at Deadline 6 remains relevant.

The Applicant has failed to address these important questions.

Throughout these Examinations we have endeavoured to raise serious concerns and expected to receive answers to those questions.

The SEAS submissions for Deadline 7 confirm in detail what continues to be outstanding.

I would take this personal opportunity to emphasise that even applying a precautionary approach, the potential for significant adverse effects on tourism and associated socio-economic businesses and other receptors cannot be excluded.

In the absence of baseline attitudinal surveys conducted during this next three months, any decisions on consenting these projects would be taken in a vacuum.

The Applicant's cavalier approach has been extraordinary. This is a National Grid plc company with extraordinary resources and profit results (up by over 35% year on year). Yet, it is as if they have not put in the basic work to provide robust and reliable evidence to support their application. The local Community has had to go round with a fundraising hat for over six years to enable our community to pay for professional specialists' quantitative analysis relating to Traffic and Roads, Noise, Landscape, Ecology, Tourism and more besides.

Our conclusion is that :

Unresolved evidential gaps

Uncertainty regarding mitigation effectiveness

Late stage procedural changes

Reliance on post consent controls

should be given material weight in the ExA's recommendations and the Secretary of State's decision-making.

This is the wrong project, at the wrong place, at the wrong time.

I would like to take this opportunity to thank the Planning Inspectors for their attention and engagement.

Best wishes

Fiona

Fiona Gilmore

SEAS

www.suffolkenergyactionsolutions.co.uk