

By email to: SouthEastAngliaLink@planninginspectorate.gov.uk

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

Date: 29 April, 2026
Your ref: Sea Link EN020026
Our ref: [REDACTED]

Dear Sarah Holmes and the Examining Authority,

RE: Sea Link EN020026 – SEAS Deadline 7 Submissions and Summary of Unresolved Issues

1. Introduction

Suffolk Energy Action Solutions (“SEAS”) submits the attached Deadline 7 submissions and Summary of Outstanding and Unresolved Issues.

These submissions supplement, and do not supersede, SEAS’ previous written representations and submissions, upon which SEAS continues to rely.

The attached submissions include:

1. SEAS D7 - SUMMARY of UNRESOLVED ISSUES
2. SEAS D7 - RESPONSE to AS-167
3. SEAS D7 - NEEDS on D6 Submissions
4. SEAS D7 - TRAFFIC on D6 submissions
5. SEAS D7 - TOURISM on D6 submissions
6. SEAS D7 - CUMULATIVE IMPACT on D6 Submission

2. SEAS’ Overall Position at the Close of Examination

SEAS’ position remains that the Applicant has failed to demonstrate that the Proposed Development satisfies the relevant statutory and policy tests.

In particular, SEAS submits that:

- the Applicant has failed to establish a robust and lawful Need case for the Proposed Development in its current form;
- significant deficiencies remain in the evidence base across multiple environmental and technical topic areas;
- cumulative effects have not been assessed in a lawful, integrated or precautionary manner;
- key mitigation measures and controls remain deferred to outline plans, future approvals and post-consent processes; and
- the Examination has concluded with substantial uncertainty remaining regarding likely impacts, mitigation effectiveness and the adequacy of the proposed control framework.

SEAS further submits that the evidence before the Examining Authority is insufficient to support a conclusion that the Proposed Development represents an efficient, coordinated and economical solution within the meaning of EN-1 and the Applicant's statutory duties.

Insofar as SEAS comments on mitigation, controls or drafting of the DCO, such comments are made strictly without prejudice to SEAS' primary position that development consent should be refused.

3. Applicant Conduct and Consequences for the Examination

Throughout the Examination, SEAS has repeatedly raised concerns regarding the Applicant's approach to the process, including:

- late submission of material;
- introduction of significant changes at a late stage;
- repeated reliance on outline or deferred mitigation;
- incomplete or evolving evidence;
- and failure adequately to engage with substantive concerns raised by Interested Parties, local authorities and the Examining Authority.

These concerns are documented throughout the Examination, including:

- SEAS' procedural complaints of November and December 2025;
- the Examining Authority's Rule 17 requests;
- and SEAS' response to AS-167 (dated 29 April 2026) and related late-stage DCO amendments.

SEAS remains particularly concerned by the increasing reliance placed by the Applicant on:

- the REAC;
- outline management plans;
- future discharge processes; and
- post-consent approvals,

rather than securing clear mitigation and enforceable controls within the DCO itself.

As SEAS has previously submitted, this approach creates substantial uncertainty regarding the effectiveness, enforceability and coordination of mitigation measures, particularly in relation to cumulative impacts and concurrent NSIPs within East Suffolk.

It also creates a significant and unnecessary burden on local authorities through the discharge of requirements process, while reducing certainty as to how mitigation and cumulative effects would in practice be controlled.

SEAS is concerned that this approach is inconsistent with the requirements of the EIA Regulations, the precautionary approach embedded within the Habitats Regulations, and the policy requirements of EN-1.

SEAS also remains concerned by the Applicant's repeated reliance on assertions unsupported by clear evidence. A notable example is the Applicant's attempt within REP5-142 to rely upon Ofgem's grant of Early Construction Funding as support for the "critical" or "urgent" need for the Proposed Development, notwithstanding Ofgem's express statement that the funding decision was not a relevant consideration or predeterminant of the DCO process.

Similarly, SEAS notes the extent to which the Applicant's Need case has materially evolved during the Examination following scrutiny of the underlying assumptions and modelling.

4. Implications for Decision-Making

At the close of Examination, substantial unresolved issues remain across multiple topic areas, including:

- Need and alternatives;
- cumulative impact assessment;
- traffic and transport;
- tourism and socio-economic effects;
- operational and construction noise;
- landscape and visual effects;
- water environment and flood risk;
- and cumulative impacts on health and well-being.

The attached Summary of Outstanding and Unresolved Issues identifies many of these matters.

SEAS respectfully submits that:

- unresolved evidential gaps;
- uncertainty regarding mitigation effectiveness;
- late-stage procedural changes;
- and reliance on post-consent controls

must all be given material weight in the Examining Authority's recommendation and the Secretary of State's decision-making.

Where evidence remains incomplete or uncertain, SEAS submits that a precautionary approach is required and that significant adverse effects cannot lawfully be excluded.

5. Conclusion

SEAS wishes to thank the Examining Authority for the considerable care and attention given throughout the Examination process.

SEAS respectfully submits that the Examination has demonstrated substantial unresolved concerns regarding the Proposed Development, and that the Applicant has failed to demonstrate that the proposal is justified, proportionate, adequately assessed or supported by a sufficiently robust and enforceable mitigation framework.

Yours faithfully,



For and on behalf of
Suffolk Energy Action Solutions (SEAS)