

To: The Rt Hon Miatta Fahnbulleh, Secretary of State for Energy Security & Net Zero

c/o Energy Infrastructure Planning Delivery Team, DESNZ

Via email: SouthEastAngliaLink@planninginspectorate.gov.uk

Subject: Sea Link (EN020026) – Response to Request for Information

Interested Party: [REDACTED]

Dear Secretary of State,

I am writing as an Interested Party who took an active role throughout the Examination, and as a resident living only a few hundred metres from the proposed Saxmundham converter station site. Although your letter of 28 August does not list me among those invited to respond, the new evidence published since the close of the Examination is so significant that I feel compelled to do so, particularly on Question 13 (Design), and on the wider issues of need and value for money.

Your letter notes that:

“The Applicant... did not narrow down the four design options to a favoured choice for the converter stations.” (Sea Link Request for Information, 28 August 2026)

This reflects a concern I raised repeatedly: the converter station design was never fixed, never final, and never capable of being properly assessed. A project of this scale cannot be properly examined when its fundamental design parameters remain unresolved.

Design (Q13)

Throughout the Examination, National Grid presented four possible designs but declined to identify a preferred option. As a result, neither the Examining Authority nor the community could understand the true scale, height, massing, or orientation of the buildings. The landscape and visual assessment were therefore based on a hypothetical design rather than a real one.

Since the Examination closed, Ofgem’s Project Assessment has revealed something even more significant. In its September 2026 consultation, Ofgem states:

“Even with the largest filter solutions proposed... compliance with applicable harmonic limits was unlikely to be achieved under all system conditions.” (Ofgem, Sea Link Project Assessment, para. 1.15)

I am not a technical expert in harmonics, but this appears to be a fundamental design issue. Harmonic filtering is integral to the footprint, feasibility, and configuration of the converter station. If the largest filters proposed by bidders are insufficient, then additional or larger filters may be required. This could mean further buildings, increased

land take, or a reorientation of the entire site, none of which were assessed in the Environmental Statement.

Any requirement for larger or additional harmonic filters would not only alter the physical layout of the site but could also affect operational noise levels. As someone living close to the proposed converter station, this is deeply concerning. Noise impacts were assessed on the basis of the original design assumptions, yet Ofgem's findings suggest that the equipment required may be materially different. This means the noise assessment may no longer be reliable.

Noise, harmonics, building massing and equipment configuration are all interdependent. If one changes, the others change with it. None of this has been assessed.

Ofgem also notes:

"Additional activity is required elsewhere on the transmission network... although the precise scope and location will depend on the solution identified." (para. 1.16)

This means the design presented at Examination is no longer reliable and may not even be deliverable in its current form. The Applicant cannot demonstrate compliance with NPS EN-1 or EN-5 because the design has not been finalised, and the new harmonic requirements could materially alter the site.

Traffic and Transport (Q39)

Your Question 39 regarding the structural survey of Benhall Railway Bridge highlights another unresolved engineering constraint. Suffolk County Council raised the bridge's weight restriction at statutory consultation, yet the Secretary of State is still asking whether a structural survey has even been completed.

This mirrors the harmonics issue: fundamental evidence that should have been available during Examination is still missing.

The Applicant's access strategy, relying on a weak bridge, a second new bridge over the River Fromus, and a new access road through sensitive landscape, remains unproven. It is also important to note that SCC proposed a northern access route, supported by the community, which would have avoided these constraints entirely. The Applicant declined to adopt or meaningfully assess this alternative. It is difficult to understand why the Applicant persisted with an access strategy dependent on a weak bridge when a safer, deliverable alternative was available.

Need and Value for Money

Two major publications since the Examination closed, Ofgem's Project Assessment and the National Audit Office's report Upgrading the Electricity Transmission Network, materially change the basis on which Sea Link was examined.

Ofgem has now confirmed that Sea Link is a £3.2 billion project, almost three times the £1.1 billion figure repeatedly stated during the Examination. Communities, local authorities, and the Examining Authority were therefore asked to assess a project whose true cost was not disclosed. The Examination was therefore conducted on the basis of a cost estimate that has since proven to be wholly unreliable.

The NAO report raises deeper concerns: grid upgrades are being delivered without whole-system appraisal, without proper comparison of alternatives, and without clear demonstration of value for money. It also notes that NESO and Ofgem did not update each other when circumstances changed.

This is directly relevant to Sea Link. The project was designed around an assumed 1,852MW export deficit at Friston created by the proposed Nautilus interconnector. However, Nautilus was formally relocated before the Sea Link application was submitted, reducing the deficit to around 352MW. NESO did not update its assumptions, and the Examination proceeded on the basis of a need case that no longer existed. The need case presented to the Examining Authority was therefore materially incorrect.

Rising Energy Bills

Recent analysis reported in the national press indicates that energy bills could rise by around 25% from January 2027, due to a predicted increase in the price cap. At a time when families are already under pressure, it is vital that DESNZ considers the affordability implications of consenting a project with a £3.2 billion price tag, a cost that will ultimately be borne by consumers through network charges.

A Deliverable Alternative Exists

During the Examination, Suffolk Energy Action Solutions (SEAS) presented a deliverable option based on upgrading existing pylon corridors in Suffolk and Kent. This would cost under £300 million, a saving of almost £3 billion and could be delivered more quickly with far less environmental impact. This evidence was never rebutted.

The NAO report makes clear that value for money depends on prioritising upgrades to existing infrastructure and avoiding unnecessary new capacity. Sea Link does not meet these criteria.

The new evidence from Ofgem and the NAO fundamentally changes the basis on which Sea Link was examined. The converter station design is not fixed, not compliant, and not deliverable in its current form. The need case has changed. The cost case has tripled. Energy bills are rising sharply. And a viable alternative exists that has never been properly considered.

In its current form, Sea Link risks becoming an expensive white elephant, a project conceived to resolve a problem that no longer exists, whose costs will fall directly on

households already facing rising bills, and whose design remains fundamentally unresolved.

Thank you for considering this submission.

Yours sincerely,

Paul Atkinson

[REDACTED]

[REDACTED]