

18 September 2026

To: The Secretary of State for Energy Security and Net Zero

Via the Planning Inspectorate: SouthEastAngliaLink@planninginspectorate.gov.uk

Application reference: EN020026

Sea Link supplementary representation on unresolved economic and delivery evidence

Dear Secretary of State,

I write in a personal capacity as an economist. Please accept and consider this supplementary representation concerning the Office of Gas and Electricity Markets' (Ofgem's) Sea Link Project Assessment consultation, published on 1 September 2026, after the close of the examination. I recognise that your current information request is directed principally to specified parties; this letter asks you to consider the implications of newly published regulatory evidence for the consent decision.

I consider that the published information leaves material uncertainty about the complete cost, deliverability and timing of the benefits of the proposed development. These matters are relevant to the weight attached to its economic benefits and to the assessment of effects on communities, businesses, the environment and human health and wellbeing. My principal concerns are set out below.

1 Delivering the capacity on which the benefits depend

Ofgem reports that the activities included in its assessment do not fully resolve the harmonic-compliance issue, which concerns the quality of the electrical waveform. Further studies are needed to identify additional mitigation, potentially elsewhere on the transmission network. Its specification and location remain to be determined. Ofgem explicitly connects resolution of this issue with delivery of the intended 2 gigawatt capacity and consumer benefits (Ofgem, 2026, paras 1.15–1.19).

I ask you to seek clarification of the additional works needed, their deliverability and expected timing, and the implications of any interim restriction in operating capacity. For the consent decision, can the applicant explain whether the necessary works and any resulting changes in operation fall within the environmental assessment already undertaken, and how any material additional or cumulative effects would be assessed and addressed?

2 The complete cost and the conclusions drawn from earlier appraisal

Ofgem proposes an allowance of £2,891.5 million in 2023/24 prices, while leaving some costs for later assessment. It also records that additional harmonic mitigation may be taken forward through other funding mechanisms (Ofgem, 2026, Table 1 and paras 1.16, 3.53–3.65). The proposed allowance therefore does not, by itself, establish the complete cost of achieving the intended output.

National Grid's March 2025 Strategic Options Back Check retained much of the earlier appraisal, including its 2020/21 cost base (National Grid, 2025, paras Ex1.1.4–Ex1.1.5). A historic price base is not itself a defect. I ask for a proportionate reconciliation of material changes in scope, relative costs and delivery dependencies, and an explanation of whether they affect the earlier conclusions on alternatives or the economic benefits relied upon in this application. Detailed regulatory allowances remain a matter for Ofgem; the relevance here is the evidence supporting the particular development before you.

3 Benefits depend on when usable capacity becomes available

The National Energy System Operator (NESO), in its Clean Power 2030 analysis, estimates additional constraint costs in 2030 of £1.4 billion or £1.1 billion, depending on the scenario, if Sea Link is not accelerated from its planned 2031 delivery. These are conditional results for one year (NESO, 2024, Table 1, p.8). Ofgem's consultation records a December 2031 regulatory delivery-incentive target, while the applicant's closing statement links Sea Link to achieving Clean Power 2030 (Ofgem, 2026, executive summary, p.5; National Grid, 2026, para. 2.4.1).

To the extent that 2030 or accelerated-delivery benefits inform your decision, I ask how their weight reflects the current delivery programme, the additional works needed for full operation and other network dependencies. A later delivery date would not remove all benefits, but benefits conditional on earlier availability need a credible delivery basis. Any comparison of proceeding, staging or delaying work also needs to account for the economic costs of delay.

4 Cumulative effects and mitigation commitments

Your information request already seeks clarification concerning health and wellbeing, employment planning, tourism, operational noise and community mitigation (Department for Energy Security and Net Zero, 2026, paras 42–44, 55–56). Suffolk County Council's April submission also records concerns about cumulative traffic and workforce pressures alongside Sizewell C; the applicant describes its assessment and coordination work (Suffolk County Council, 2026, paras 3.33–3.38 and 8.9–8.17; National Grid, 2026, paras 4.2.7–4.2.12).

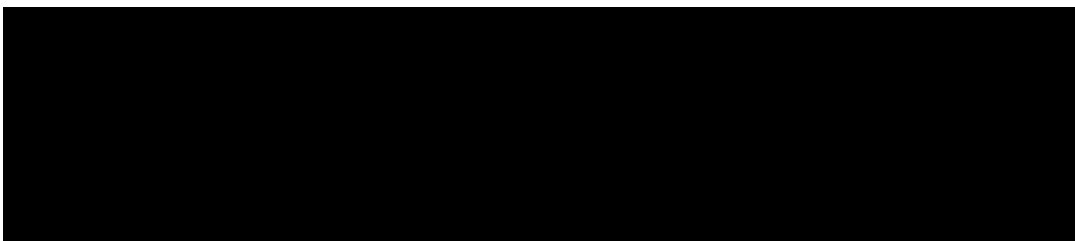
I ask how the latest delivery assumptions, including any acceleration or additional mitigation works, affect construction overlap, access, workforce demand and local business disruption. Where consent relies on mitigation or coordination commitments, how will their delivery be secured, including responsibility for necessary shared works and costs? This question concerns the dependability of the commitments relied upon, not an assertion that the examination concerns remain unresolved today.

I ask you to obtain and consider these clarifications before determining the application, identifying where existing evidence already supplies the answers. If information essential to assessing the deliverability of the claimed benefits or material adverse effects remains outstanding, I ask that determination be deferred to obtain it and allow any necessary opportunity for comment. I ask that consent is not granted unless these matters have been satisfactorily addressed in the decision.

I do not suggest that Ofgem's consultation, on its own, proves Sea Link uneconomic. It identifies specific unresolved matters whose implications for this consent decision merit an explicit explanation. I would be grateful for acknowledgement of receipt and confirmation of whether this representation has been accepted for consideration.

Yours faithfully,

Jacqueline Mallender



References

Department for Energy Security and Net Zero (DESNZ) (2026) *Sea Link: request for information*, 28 August, as amended 2 September.

National Energy System Operator (NESO) (2024) *Clean Power 2030: Annex 2, networks, connections and network access analysis*, Table 1, p.8.

National Grid (2025) *Sea Link Strategic Options Back Check Report*, document 7.2, March.

National Grid (2026) *Sea Link: Applicant's Closing Summary Statement*, document 9.145, April, REP7-192.

Office of Gas and Electricity Markets (Ofgem) (2026) *Sea Link: Project Assessment*, consultation, 1 September.

Suffolk County Council (2026) *Sea Link: summary statement of previously raised matters that have not been resolved to the Council's satisfaction*, 29 April, REP7-367.