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Sea Link DCO Application EN020026

FAO: Rt. Hon Miatta Fahnbulleh MP, Secretary of State for Energy Security and Net Zero
c/o Energy Infrastructure Planning Delivery Team, DESNZ

ESCEP response to the Secretary of State's Request for Information of August 28th 2026

East Suffolk Communities Energy Partnership – ESCEP – is a partnership of over 30 East Suffolk parish and town councils, led by a Steering Group. We seek to share the knowledge and understanding and commitment of our parish and town council members in preparing responses to NSIP applications in East Suffolk, and have been acting as an Interested Party throughout the Sea Link DCO Examination.

Dear Secretary of State,

ESCEP and other local community organisations, and indeed the more than 6,000 Interested Parties to this Examination, are not addressed in your Request for Information (RFI), but we are aware it is your Department's clear intention to ensure that all relevant matters have been correctly identified and assessed.

We refer particularly to your **Question 13, Design**, which sets out how, even now, there is no final 'design choice' for the converter stations; and to the references in that paragraph to the requirements of NPS EN-1, EN-3 and EN-5.

We will include in our comments on that request some references to the recent Ofgem Project Assessment on the Sea Link project, [Sea Link: Project Assessment](#) which essentially contradicts the claims of NGET to have set out a well-designed plan for a functional grid reinforcement, adding to existing concerns about the overall efficiency, value for money and misplaced needs case for the Sea Link proposal.

1 Design of the converter stations – Q13 and EN-1, EN-3, EN-5

SoS 26 August 2026 RFI extract:

13. The Secretary of State notes that although the Applicant demonstrated how early stages of design for the Proposed Development evolved it did not narrow down the four design options to a favoured choice for the converter stations. The Applicant is therefore requested to provide an update on whether it has identified favoured choices for the converter stations and if it has, how those designs meet paragraphs 4.7.7, 4.7.11 and 4.7.12 of NPS EN-1, paragraphs 2.4.1-4 of NPS EN-5, paragraphs 2.5.1 and 2.5.2 of NPS EN 3, and paragraphs 2.9.18 and 2.9.19 of NPS EN-5

1.1 Broadly, these EN-1 references require explanation of the design selection process (4.7.7), the balance between functionality (*‘including fitness for purpose and sustainability’*) and aesthetic considerations, including local impacts on landscape quality (4.7.11), and operational safety and security (4.7.12) The EN-3 and EN-5 references bring in the importance of ‘good design’ and the Holford and Horlock rules.

1.2 To satisfy these criteria, it is very clear that the first step must be to demonstrate that a specific design has been selected, and *that it meets the fitness for purpose* criteria. It cannot meet those criteria if

- (a) the reinforcement required in EC5 has been incorrectly calculated,
- (b) the system design, including but not limited to the converter station, will not be compliant with NETS-SQSS requirements,
- (c) there is any risk that the final reinforcement could suffer from unacceptable ‘power quality challenges’ that may require wider grid reconfigurations, and
- (d) the projected cost of the failed reinforcement solution has not been tested for efficiency and value for money against other serious proposals.

It is our contention that none of these four conditions has been satisfactorily met on the basis of the documents submitted at Examination. We look at these questions below, and incorporate material from Ofgem’s recent consultation paper on Sea Link Project Assessment^[1] and additionally from SEAS^[2] proposals put forward during the later stages of the Examination in REP6-256A^[3].

2 Defects in the design of the project

2.1 The proposed solution, and the costs, are based on incorrect basic calculations.

Examination REP-256A, section 6 paras 6.1-6.5 sets out in some detail the serious and fundamental errors in the calculation of boundary conditions relevant to the Sea Link ‘reinforcement’ model, including the failure to reflect the impact of relevant concurrent

projects and upgrades. We would particularly highlight NGET's inexplicable erroneous inclusion in its Application of the Nautilus project. Prior to the presentation of the Application and the Examination the Nautilus project had moved to the Isle of Grain, taking away 1500MW of the claimed 1852MW 'deficit' in the 'Sizewell area'.

The erroneous inclusion means the calculation of boundary deficits is fundamentally flawed and that Sea Link is designed to meet deficits that do not exist. The project cannot therefore be claimed to be 'fit for purpose' as required by EN-1 4.7.11 and 4.7.12. Indeed, for similar reasons it is clear that the NGET's proposed 'solution' would not actually be NETS-SQSS compliant,^[4] on the basis of the documents submitted for Examination.

2.2 A previously undisclosed, and very significant obstacle to the successful delivery of the Sea Link Programme has now emerged.

Following the publication of Ofgem's Sea Link Project Assessment, it is now clear that NGET and Ofgem are both agreed that the *overall* design and implementation of **the proposed Sea Link project will not produce a reinforcement that will meet 'compliance with applicable standards'**:

'1.15...During the detailed design and procurement of Sea Link, NGET identified power quality challenges associated with connecting the Project in an area of the network with significant connection activity. The harmonic studies undertaken indicated that, even with the largest filter solutions proposed by bidders on the Project, compliance with applicable harmonic limits was unlikely to be achieved under all system conditions.'^[5]

'1.16 ...We understand that the activities proposed by NGET in this PA do not fully resolve the harmonics issue.'

The mitigation proposals made by NGET to Ofgem amount to a commitment to carry out 'further research' to identify either a solution or a mitigation of the harmonics issue, either within the Sea Link project or more widely or indeed elsewhere on the grid system entirely. This research would be carried out using funds unconnected with NGET's bid for project funding.

We thus contend that NGET cannot at the present time deny that the Sea Link project detailed in the Application, for which a decision has to be made by the SoS now, is both flawed in its calculation of fundamental necessity and ability to reliably deliver its target 2GW. An as yet unfunded and undefined research project into harmonic systems (both within the Sea Link system and elsewhere on the Grid) is anticipated to provide mitigation or solutions to the fundamental design flaws but at what cost and with what delays to the Sea Link project? The Ofgem PA Consultation report's language^[6] on this topic is unequivocal:

‘1.16 Further investigations are ongoing to determine the appropriate specification and location of further harmonic filters or other solutions as may be identified[7].’

NGET anticipates that additional activity is required elsewhere on the transmission network to resolve this issue and ensure compliance with applicable requirements...’

‘...the precise scope and location will depend on the solution identified..’

‘...actions may include wider reinforcement or additional harmonic mitigations...’

‘We consider that addressing the identified harmonics issue is a necessary component of delivering the Outputs and consumer benefits associated with Sea Link.

ESCEP’s view is that it now seems quite straightforward that the Sea Link project is fundamentally flawed and that it would be perverse to approve a project that is presently requesting public funds in excess of £3.1bn, and clearly will require additional funds but cannot show what those cost would be or that it will deliver the required reinforcement (2GW) *either* as presently submitted *or* after undefined research and amendment.

ESCEP also notes that it is surely a gross breach of the ‘*Guidance on the examination stage for Nationally Significant Infrastructure Projects*’ under the Planning Act 2008[8], and particularly the paragraphs on changes to the application[9], for this issue to have been known to Ofgem and to NGET but not revealed at any stage of the Examination to the Examining Authority or interested parties.

3 Costing of the project and value for money considerations are inconsistent

3.1 Until the Ofgem PA consultation report was published on September 1st, information on the projected costs of the Sea Link project has been slight, and redaction of relevant documentation meant that only industry-standard costs could be assigned to the programme by interested parties. The Ofgem consultation now reveals that the overall costs bid for are £3.197bn, with Ofgem minded to approve £2,891.5bn of this sum – these are at 2023/4 prices and will rise substantially before the project is likely to commence. This confirms previous estimates based on Ofgem’s ECF decision and the heavily redacted calculations on which *that* was based..

3.2 **Alternative, detailed and robust reinforcement solutions** based on lower impact re-conducting in Suffolk and Kent, and limited additional OHL in Kent have been submitted for examination by SEAS in their Examination REP6-256A. The SEAS proposals, which were developed in close co-ordination with organisations in Kent, start by eliminating the many errors in NGET’s calculation of boundary deficits, and include, rather than ignore, the impact of consented changes elsewhere on the Grid – for example to the Bramford to Twinstead upgrade - and it corrects the erroneous and disingenuous inclusion by NGET of Nautilus in the Sea Link needs case. The proposals

for EC5 and LE1 boundaries are set out very clearly in paras 7.4.4-5 and 7.4.6 respectively of the SEAS document.

The costs of the alternative and NETS-SQSS compliant solution put forward are based on industry standards[10], and amount to between £170m and £260m. A worst case figure of £300m would in effect reduce the cost of the necessary reinforcement by around 90%. There can be no question that accepting the higher of these two proposed alternatives could be compliant with EN-1's requirements on fitness for purpose and *sustainability*.

4 Conclusions

4.1 The project cannot claim currently to have met the design criteria in EN-1, since the Sea Link project cannot forecast either when or how it will meet Grid Code requirements for safety of transmission in all situations;

4.2 The project is failing to demonstrate value for money, and has not been fully assessed against credible alternatives – partly because financial information has been kept from the public eye. The National Audit Office has declared in its recent report on Electricity transmission: ‘... We found limited public transparency on the cost, progress and status of the portfolio of projects...’[11]; In this case, it appears that an apparently fatal defect in the design of the project has been discussed in private with the regulator, and has been disclosed neither to the Examining Authority nor to consultees over the course of the DCO Examination.

4.3 ESCEP therefore asks the Secretary of State to reject the Application.

[1] Consultation Sea Link – Project Assessment, Ofgem 01/09/2026

[2] Suffolk Energy Action Solutions

[3] <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-003300-01.SEAS%20D6%20NEED%20on%20D5,%20ISH3,%20Action%20Points%20&%20ExQ3-%20FINAL.pdf>

[4] The project as submitted fails to resolve the SC2 transfer deficit -REP6-256A, para 7.4.6.

[5] Consultation Sea Link – Project Assessment, Ofgem 01/09/2026, para 1.15

[6] Ibid, paras 1.15-1.19

[7] Our emphasis

[8] The guidance issued on April 30th 2024 would have been in force during the examination.

[9] Paragraph 018 Reference ID 07-018-20240430 of the April 30th 2024 document

[10] Institute of Engineering and Technology, *A comparison of Electricity Transmission Technologies: Costs and Characteristics*, IET 2025

[11] NAO Sept 2026, 'Upgrading the Electricity Transmission Network', Key findings, para 18.

East Suffolk Communities Energy Partnership

