

Reference: EN020026 – Sea Link Project (28/08/2026 DESNZ letter requesting further information) v2

Date: 18 September 2026

From: Susan Bridges, ID No. [REDACTED]

SUBMISSION TO THE DEPARTMENT FOR ENERGY SECURITY AND NET ZERO (DESNZ)

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

Via Email: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Madam

I write in response to your department's Request for Information of 28 August 2026 about the Sea Link Development Consent Order (DCO) application. As an Interested Party, the queries raised in the letter need to be understood and answered within the context of the "Whole Project". This follows the case *Raeshaw Farms Ltd v Scottish Ministers* [2026] CSIH 10, which offers important guidance on the approach decision-makers and developers should adopt when assessing renewable schemes under Environmental Impact Assessment (EIA) regulations. To grant development consent for Sea Link without evaluating the cumulative impacts of consented, unbuilt and incomplete projects since March 2016 would be an irrational planning decision and a failure to take into account a relevant consideration, rendering any final DCO vulnerable to Judicial Review.

Landscape and Visual, No. 11

1. No financial contribution can legally or physically mitigate the permanent significant harm the Sea Link project will inflict on the setting of the Suffolk & Essex Coast & Heaths National Landscape (S&EC&H). As the Secretary of State, please evaluate the Applicant's professional judgement against the baseline established in National Grid Electricity Transition's (NGET) own *Visual Impact Provision (VIP) Report*¹. In that statutory evaluation, NGET concluded that standard 400kV overhead pylon lines passing through Knodishall, Friston, and Gromford cause "*individual impacts which are of high importance*", harming the visual amenity of the landscape for users of "regional trails and cycleways".
2. Having admitted over a decade ago that pylon lines cause "high-importance" visual harm to this area, the Applicant's professional judgement needs to be questioned as to why they completely ignored their own report when selecting the Sea Link converter station site at Saxmundham next to Grade 2* Listed St John's Church and sixteen Listed Buildings in Sternfield and within sight of the

¹ *Visual Impact Provision (VIP)*, Landscape and Visual Impact Assessment of Existing Electricity Transmission Infrastructure in Nationally Protected Landscapes in England and Wales, Technical Report. October 2014 Professor Carys Swanwick, Gillespies, Land Use Consultants. Page 83.

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said pylons. If standard overhead lines cause “high importance” harm, the introduction of massive, industrialised onshore converter stations, co-locating Sea Link and Lion Link at Saxmundham and connecting both to the grid at the Friston Hub is unassessed cumulative harm by NGET. In addition, an unidentified third converter station is included in the Sea Link application. This will further increase the harm to the setting and landscape character of the S&EC&H, Saxmundham and Sternfield.

3. NGET's onshore design continually justifies its statutory obligation under Section 9 of the Electricity Act 1989 to provide: “(a) to develop and maintain an efficient, coordinated and economic system of electricity distribution (b) to facilitate competition in the supply and generation of electricity.”² but fails to equally justify its statutory duties also under Schedule 9 to “*preserve natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*”³
4. If the Applicant has failed to meet its obligations under the 1989 Electricity Act, as the Secretary of State, please reject Sea Link being sited within the setting of the S&EC&H at Saxmundham and Minster Marshes in Kent and move the converter stations to industrialised zones.

Ecology, Biodiversity and Ornithology No. 15 & Water Environment No. 37

1. The Applicant's engineering models treat coastal erosion as a purely marine-driven phenomenon. This is a flaw in the assessment. The cliff collapses at Thorpeness during the 2025/26 winter caused the destruction and loss of residential properties, demonstrating the primary cause of the cliff erosion in the specific Suffolk crag environment was sub-aerial rainfall saturation.
2. The prolonged rainfall saturated the soft, un-consolidated sand cliffs. When the sand aquifers become over-saturated, the internal pressure causes the cliff face to structurally fail, liquefy, and collapse. Because this erosion is driven top down by intense weather events rather than bottom up by tides and wave action, HDD drilling into the subtidal zone does *not* protect the onshore transition infrastructure or the cable corridors running immediately behind the cliff edge.

² Electricity Act 1989, SCHEDULE 9, *General duties of licence holders*

³ Electricity Act 1989, SCHEDULE 9, *Preservation of amenity: England and Wales,*

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3. Heavy, vibrating trenchless drilling operations executed within an unstable, rain-saturated sand cliff environment risks triggering landslips during the construction phase. Post-construction, as climate change accelerates extreme rainfall patterns, rapid cliff erosion caused by rain saturation could become more frequently than NGET's dry weather modally predicts. This increases the risk of cable exposure and asset failure.
4. In addition, EDF's planned Hard and Soft Coastal Defence Features at Sizewell C could well alter the localised longshore sediment drift. By disrupting natural longshore drift, these defences threaten to starve beaches at Thorpeness and Aldeburgh of sand and shingle supply, accelerating erosion rates. Has NGET modelled Sea Link's landfall with Sizewell C's most recent coastal protection plans dynamically together?
5. If NGET's core budget is being stripped back by the regulator, they possess no financial allowance or structural contingency to manage the long-term liabilities of sub-aerial cliff collapse. Funding for this eventuality should be kept alive.
6. Development Consent cannot be granted on a baseline assessment that ignores the rainfall-driven collapse of the Thorpeness sand cliffs or the down-stream starvation effects of Sizewell C's sea defences. The weather events of last winter prove that the coastline at Thorpeness is inadequate for hosting strategic cable landfalls with increased rainfall. Consent should be refused, and the applicant directed to a more stable landfall site.

Socio-economics and Tourism, No. 44

1. The request for a detailed plan to minimise and maximise tourism benefits highlights a blind spot in the Applicant's submission. The Suffolk Coast boasts an annual £693 million tourist economy built entirely on a specific brand: tranquillity, open skies, and natural and cultural heritage. According to data from local impact reports, a vast percentage of visitors are classified as day visitors from Ipswich and within a two-hour radius.
2. NGET's baseline assumption that there will be "*no significant adverse effects on visitors or tourism*" is challengeable. By failing to model the cumulative impact of Sea Link alongside EA1N, EA2, Lion Link, and the still expanding construction footprint of Sizewell C, the Applicant has entirely understated the threat of tourism displacement. The overlapping logistics, massive traffic interference on the only access roads into major tourism hubs like Aldeburgh and Snape, and persistent construction noise will drive visitors away from East Suffolk for over a

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decade. NGET has failed to produce credible, evidence-backed mitigation measures.

3. The destruction of local socioeconomics and tourism is not a cost-saver for consumers. It is fallacy for the Applicant to claim they can "maximise the benefits" of an energy reinforcement project that delivers excess electricity that is not needed in Suffolk, creates negligible long-term local employment and permanently blights the landscape that feeds the local hospitality sector. As the Secretary of State, please consider that the only effective way to protect the annual £693 million tourism economy is to reject Sea Link's converter station at Saxmundham. Consent should be withheld until the Applicant restructures the scheme away from the Heritage Coast and the Alde and Ore Estuary to an industrialised zone.

Cumulative Impacts, Nos. 52, 53 & Other Matters, No. 56

1. The Request for Information's focus on long-term infrastructure viability cannot be separated from the historical origin of the Friston (Kiln Lane) Substation DCO. This hub, now referred to as a "Super-Hub" was never a chosen, strategic asset like Bramford. The Friston (Kiln Lane) connection to the grid was an emergency fallback position created solely because through The East Anglia ONE Offshore Wind Farm (Corrections and Amendments) Order 2016 (S.I. 2016/447) S.I. 2016/447, which allowed NGET and Scottish Power Renewables to downgrade its transmission corridor from high-capacity HVDC to lower-efficiency HVAC cables. This "Non-Material Change" was erroneously processed as Corrections and Amendment and was never challenged by the Applicant, East Suffolk District Council, Suffolk County Council and BEIS⁴. At the time, the District and County Councils were seriously under resourced with Sizewell C and could not devote the necessary manpower to renewables infrastructure. As the Secretary of State, please note that the Suffolk Preservation Society published "*Greening the Great Grid Upgrade, A new vision for landscapes and communities in East Anglia*" addressing the inequitable impacts on East Anglia's countryside and communities, calling for better grid planning. There is not a single reference to this publication in the Applicant's Sea Link's DCO documents nor in the DCO documents for EA1North and EA2.
2. The March 2016 "Non-Material" amendment meant the 37 km Bawdsey-to-Bramford grid corridor was never maximised to its potential 8.4GW HVDC capacity⁵ and a new

⁴ GRID CONNECTION SUMMARY, Interested Party: C C Wheeler PINS Refs: 20023840 & 20023842
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⁵ GRID CONNECTION SUMMARY, Interested Party: C C Wheeler PINS Refs: 20023840 & 20023842
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connection to the grid was required. Since then, NGET has assisted in "salami-slicing" the PINS planning process, resulting in significant cumulative harm to communities, cultural and heritage assets, ecology, economy and landscape designations.

3. Under *Raeshaw Farms Limited v Scottish Ministers*, I trust the Secretary of State will be advised to evaluate all cumulative impacts arising from connections to the Friston asset since March 2016 as a "Whole Project", as Sea Link is converting electricity resulting from downsizing the EA ONE DCO.

Development Consent Order, No. 55

1. The proposed insertion of a 34 dB operational noise limit (day and night) under Requirement 18 is vital but exposes the structural contradictions of NGET's submission. Achieving a rigorous 34 dB limit for a massive 2GW converter station requires highly specialized, heavy structural engineering: fully enclosing main valves and transformers in noise-reducing buildings, utilizing advanced acoustic screening, and placing noisy external cooling fans behind physical barriers. This will be challenging with the houses on the west side of the site.
2. As noted by Professor Sir Dieter Helm, this is the end-result of Ofgem and the System Operator's "passive, request-to-connect" regulatory model. NGET does not make its primary profits by selling electricity; it makes profits based on a percentage return of its total capital expenditure (the Regulatory Asset Value, or RAV). Sea Link functions less as a national infrastructure solution and more as a capital-generating "toll booth" designed to expand the Applicant's regulated asset base at the expense of the consumer.
3. As the Secretary of State, please reject the Applicant's desktop assertion that the proposed 34 dB limit can be sustained without severe, unmitigated low-frequency noise pollution. Operational baselines across the UK provide empirical proof of this failure. At comparable HVDC/HVAC infrastructure hubs, the Sellindge Converter Station in Kent and the Hunterston Converter Station in Ayrshire, residents have monitored, recorded and complained of a pervasive, low frequency 100Hz/200Hz tonal hum that bypasses standard acoustic screening.

Conclusion: request for deferral of decision

1. Given the serious unresolved engineering and environmental defects detailed in this response, I request that as the Secretary of State, you defer any final determination on the Sea Link DCO until: **A.** An independent cumulative

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assessment of all the projects since the March 2016 Non-Material Changes were accepted and

B. NESO's Strategic Spatial Energy Plan (SSEP) has been formally finalised and accepted.

2. The SSEP was explicitly commissioned by the government to end the chaotic, uncoordinated, "request-and-connect" planning process that has led to the current flawed onshore layout. Approving a legacy, point-to-point onshore asset like Sea Link at this juncture completely undermines the integrity of the government's own transition toward a coordinated national energy blueprint.
3. The Applicant's primary justification for fast-tracking Sea Link under the Accelerated Strategic Transmission Investment (ASTI) framework is that it will lower consumer bills by reducing grid constraint payments. This economic claim is flawed. While the project may superficially reduce bottleneck payments on paper, it does so by ignoring the enormous structural and financial costs passed on to consumers for the foreseeable future.
4. Sea Link's economic model entirely omits the devastation of East Suffolk's annual £693 million tourism economy, the long-term operational liabilities of navigating Europe's fastest-eroding sand cliffs, and the massive civil engineering premium required to enforce a strict 34 dB noise threshold on an artificially clustered network hub. Furthermore, under Ofgem's regulatory framework, the multi-billion-pound capital cost of building these fragmented onshore assets directly inflates the Applicant's Regulatory Asset Value (RAV).
5. The economic inefficiency of the Sea Link project design is no longer a matter of local debate; it has been confirmed by Ofgem in the draft Sea Link Project Assessment report. Ofgem propose a £305.5 million reduction from National Grid's requested allowance, specifically citing unjustified costing models and inefficiencies.
6. It is financially reckless to force an uncoordinated onshore asset through the DCO system given the background to how Sea Link evolved. I request that as the Secretary of State, you halt this DCO process and wait for the "Whole Project" to be assessed and for the delivery of the SSEP report.

Yours faithfully

Susan Bridges