



Response to the Secretary of State's invitation to all interested parties to comment on responses to the request for information: Sea Link (EN020026)

Response deadline: 23:59, 22nd October 2026

To: The Secretary of State for Energy Security and Net Zero, c/o Energy Infrastructure Planning Delivery Team, Department for Energy Security and Net Zero

Via Email: SouthEastAngliaLink@planninginspectorate.gov.uk

Application reference: EN020026

From: Walberswick Against LionLink (WALL)

Interested Party reference: [REDACTED]

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Date: 21st October 2026

Dear Secretary of State,

Walberswick Against LionLink (WALL) welcomes the invitation in the Department for Energy Security and Net Zero's letter of 22nd September 2026 to comment on the responses to the Secretary of State's consultation letter of 28th August 2026 (Department for Energy Security and Net Zero, 2026b, para. 2). WALL, a grassroots community group set up in 2023 in response to the proposed LionLink project, has taken part in the Sea Link examination, and many of its members also made representations in their own right during the examination. Subsequently, WALL's members responded individually to the Secretary of State's consultation letter of 28th August 2026. WALL has also responded to Ofgem's Sea Link Project Assessment and OHA Timelines and Incentives consultations, and to the Public Accounts Committee inquiry Clean Power by 2030: Upgrading the Grid (Walberswick Against LionLink, 2026a, 2026b, 2026c). WALL works cooperatively with the local Parish, District and County Councils and other community organisations.

WALL's comments are drawn from eleven of the published responses to the Secretary of State's consultation letter of 28th August 2026, listed in Annex A, and from National Grid Electricity Transmission's (NGET's) own response. Taken together, these responses raise six connected concerns that require further investigation and information before the Secretary of State can properly assess the application:

- the cost of the project;
- the capacity and timing of its claimed benefits;
- the need it is meant to meet;
- the alternatives;
- its technical deliverability;
- its cumulative effects.

Taken together, the responses sent to the Secretary of State show that critical questions on the economic and need case for Sea Link remain unresolved, and that consent should not be considered further until these questions have been addressed.

WALL has used material published after the examination of the Sea Link project closed to check the published responses against current evidence and to identify the specific clarifications needed before determination, principally Ofgem's Sea Link Project Assessment consultation published 1st September 2026 (Ofgem, 2026) and the National Audit Office (NAO) report 'Upgrading the Electricity Transmission Network', published 11th September 2026 (National Audit Office, 2026).

WALL hopes that its analysis will assist the Secretary of State in testing the claims made in the application and in recognising that the questions and concerns raised in the responses are material and bear directly on the weight that can be given to Sea Link's claimed benefits, costs and deliverability.

1 The cost of Sea Link presented to the Secretary of State is not complete

The cost figures in the representations are not on a common price basis, and the cost of delivering a working 2GW link remains unknown.

WALL asks the Secretary of State to obtain a single reconciliation, on a common price base, of the cost of delivering usable and compliant 2GW capacity, including costs deferred or funded elsewhere. WALL considers this information necessary before determination. To do otherwise risks escalating costs, delays, and costly mistakes which will ultimately fall on consumers.

Several representations compare a figure of about £1.1 billion for Sea Link presented during the examination, with the figure of about £3.2 billion NGET is using now (C1-064, p. 3; C1-096; C1-102; C1-126, p. 1). The published totals differ substantially, but even these figures are not like for like and may not represent the final cost. For a published reference point, NGET's Strategic Options Back Check Report (APP-320) gives an indicative capital cost of £1,154.2 million for the preferred option, SL2, in a 2020/21 cost base (National Grid Electricity Transmission, 2025, para. Ex1.1.5 and Table Ex 1.1). It is an option-appraisal estimate, and its scope relative to later figures has yet to be reconciled. The £3.2 billion figure is NGET's requested total cost of £3,197.0 million in 2023/24 prices. Ofgem proposes an allowance of £2,891.5 million in 2023/24 prices, equivalent to £2,321.7 million in 2018/19 prices (Ofgem, 2026, pp. 4–5).

On the published figures, NGET's requested cost is roughly 2.2 to 2.8 times the examination estimate, and Ofgem's proposed allowance roughly 2.0 to 2.5 times; the range reflects the different price bases (Annex B). A true like-for-like increase requires common scope and a consistent inflation adjustment, which is the reconciliation WALL asks the Secretary of State to request. The proposed allowance is also not the whole cost. Three categories of costs related to building Sea Link have not been included. Taking such a piecemeal approach allows NGET to understate the ultimate costs to Government and consumers of making the project operational:

- **Harmonic mitigation.** NGET expects to take forward additional harmonic works elsewhere on the network "using alternative funding mechanisms" (Ofgem, 2026, para. 1.16). WALL asks that the reconciliation identify the additional mitigation costs attributable to connecting Sea Link, including necessary works funded elsewhere, and explain the allocation of any shared network costs without double counting.
- **The Richborough to Canterbury overhead line.** These works are excluded from the requested construction allowance and are proposed as eligible for later assessment under the ASTI Uncertain

Cost Reopener (AUCR), a process through which NGET may apply to Ofgem for further funding, without guaranteed funding (Ofgem, 2026, paras 2.3 and 3.65; C1-096).

- **Other reopener items.** Archaeology, unexploded ordnance, biodiversity net gain, price adjustments and hedging are proposed as cost areas for that reopener. NGET's initial estimates for some of these are published, for example £51.7 million for archaeology and £27.9 million for unexploded ordnance in 2023/24 prices, but final costs are not settled (Ofgem, 2026, Table 1 and paras 3.29, 3.66 and 3.71). Ofgem states that eligibility is not a commitment to future funding (Ofgem, 2026, para. 1.21).

Ofgem's proposed reduction of £305.5 million in 2023/24 prices cannot be understood as a demonstrated saving to consumers, since part of it simply moves costs to later assessment rather than removing them (Ofgem, 2026, Table 1 and paras 3.66 and 3.71; Walberswick Against LionLink, 2026a, p. 3).

2 Any benefits depend on capacity and timing that are not yet secured

Sea Link's case rests largely on avoided constraint costs, i.e. the costs of managing bottlenecks on the network. Those benefits depend on the link operating at full capacity, when it does so, and on there being no better alternatives. The Secretary of State should obtain an explanation of what usable capacity Sea Link is expected to provide and from what date. The Secretary of State should insist on knowing how the constraint benefits relied upon would change under consistent capacity and delivery scenarios, including full operation starting later than 2030, which Ofgem's regulatory target date of December 2031 (Ofgem, 2026, p. 5) suggests is now the most likely scenario.

Ofgem records that the measures in NGET's submission "do not fully resolve the harmonics issue", that further activity may be needed elsewhere on the transmission network, and that resolving the issue is "a necessary component of delivering the Outputs and consumer benefits associated with Sea Link" (Ofgem, 2026, paras 1.16 and 1.18). Any derating of the circuit, meaning operation below its rated capacity, due to harmonic issues would mean the project's outputs will not be achieved (Ofgem, 2026, para. 1.12).

The benefit Ofgem cites, NESO's estimate of £1.1 billion to £1.4 billion, is the consumer benefit of bringing Sea Link forward to 2030 (Ofgem, 2026, p. 4). It is a conditional estimate for a single year (C1-156, section 3), and its price base is not specified in the passage cited. Ofgem's regulatory target date for delivery is December 2031 (Ofgem, 2026, p. 5). The NAO reports that NESO does not recalculate constraint costs for each delay, having judged that updated estimates were not necessary to support planning decisions (National Audit Office, 2026, summary para. 16).

Later delivery would forgo some or all of the claimed 2030 acceleration benefit, and reduced usable capacity could reduce benefits further. WALL asks NGET and NESO to identify any updated estimate on a consistent capacity and delivery basis already submitted, or to provide one.

3 Sea Link's need is highly questionable

The representations raise substantive questions about whether the network needs Sea Link as designed. Before determination, the Secretary of State should obtain a current, reconciled statement of the boundary requirements Sea Link is intended to meet, that is, the limits on power transfer between parts of the network, including those labelled EC5, LE1 and SC2. It should reflect the relocation of Nautilus and consented reinforcements such as Bramford to Twinstead, and not assume projects that have not yet applied for consent.

NGET's need case in the application was based on a Sizewell export-group deficit of about 1,852MW, which assumed that the Nautilus interconnector would connect at Friston. As SEAS points out, Nautilus had already been relocated to the Isle of Grain before the Sea Link application was submitted on 27 March 2025 (C1-074, para. 3.14). Other representations argue that the need case following Nautilus's relocation quickly unravels (C1-064, p. 3; C1-078, section 3; C1-102).

SEAS's examination analysis puts the remaining deficit at no more than 352MW (C1-102 gives about 325MW), arising around 2040 and only if LionLink, a separate interconnector project that has not yet applied for consent and remains highly controversial, proceeds in this same location. Without LionLink, SEAS finds that existing circuits keep a 1,582MW export surplus out to 2040 (C1-074, para. 3.14, citing REP6-256A). It would be poor practice to justify one project on an assumed decision to approve the other.

In fact, LionLink's own economic case in relation to costs to consumers and businesses cannot be justified on current evidence. Ofgem's 2024 modelling of LionLink estimated GB consumer-welfare losses of £3.1 billion to £6.1 billion across its three Marginal Additional scenarios (25-year present values in 2022 prices, discounted at 3.5 per cent) (Ofgem, 2024, paras 4.23–4.27 and Annex, p. 70). Modelled total GB market welfare remained positive only because producer and interconnector gains outweighed those consumer losses. This matters, given the Government's focus on reducing Britain's high energy costs and desire to build support for a well-designed transition to green energy. WALL has provided evidence in this regard to Ofgem's OHA Timelines and Incentives consultation (Walberswick Against LionLink, 2026b).

4 The responses leave the comparison with lower-cost alternatives unresolved

WALL recommends that the Secretary of State ask NGET and NESO to identify the existing technically comparable assessment of the overhead-line alternative or, where none addresses the points raised, to provide one, using consistent assumptions for capacity, security of supply, cost, programme and environmental effects.

SEAS proposed an alternative based on upgrading and reconductoring the existing overhead-line corridors in Suffolk and Kent. It costs this at under £300 million and states that it would meet the security standard (C1-074, para. 3.16, citing REP5-147, REP6-256A and REP7-292). ESCEP, another respondent, puts the cost even lower at £170 million to £260 million, for an option that includes limited additional overhead line in Kent (C1-162, section 3.2). Several other representations ask that the alternative be assessed (C1-064, p. 3; C1-096; C1-102).

The scale of the difference between the published estimates, at a time when Government is rightly concerned about the UK's very high energy costs impacting consumers and limiting growth, warrants a transparent, independent comparison on a common basis. At programme level, the NAO found that the grid upgrades chosen for Clean Power 2030 "are not supported by a full business case, options appraisal, or assessment of overall value for money", and that most were chosen because they were already in development (National Audit Office, 2026, summary para. 18).

The increase in Sea Link's estimated cost since the APP-320 options appraisal also matters for the choice of option. NGET's appraisal compared options using indicative estimates and assumed that, while final costs would exceed those estimates, all options would rise in proportion (National Grid Electricity Transmission, 2025, para. 5.1.14). The additional harmonic works identified for Sea Link may affect its costs differently from those of other options, so the assumption that all options would rise in proportion cannot be relied on in the light of current evidence (Ofgem, 2026, paras 1.15–1.18).

The Secretary of State should consider whether the comparison of options still holds once the cost increases for Sea Link, including any harmonic works, are taken into account.

5 The responses leave the assessment of the harmonics solution unresolved

WALL asks the Secretary of State to obtain a statement of the works needed for compliant 2GW operation, their location and programme, and whether they fall within the assessed and consented envelope.

Ofgem records that, even with the largest filter solutions proposed by bidders, compliance with harmonic limits was unlikely to be achieved under all system conditions, and that the precise scope and location of further works “will depend on the solution identified” (Ofgem, 2026, paras 1.15–1.16). These representations state that the issue was not disclosed during the examination (C1-073; C1-074, paras 3.8–3.11; C1-162, section 2.2).

Representations ask whether larger or additional filters would change the converter station footprint, operational noise or access, and whether works elsewhere on the network fall within the environmental assessment (C1-064, pp. 1–2; C1-073; C1-218). These are questions about the adequacy of the environmental information, not only about cost.

NGET retains design flexibility, but its response identifies an emerging design for the converter station halls, kept simple and close to the baseline option, and explains why (C1-178, pp. 9–15). It does not explain how the harmonics issue affects that emerging design or the assessed envelope. C1-178 contains no account of the harmonics issue, additional filter equipment or Ofgem’s assessment. Asked for an update on any other outstanding or relevant matters, NGET replied that it had “no further response” (C1-178, p. 34).

NGET’s letter dated 16th October 2026 (C3-002, pp. 27–28) does not provide an adequate explanation of the harmonics issue. NGET’s assertions contradict Ofgem’s record, as detailed earlier in this section, that even with the largest filter solutions proposed by bidders, compliance with harmonic limits was unlikely to be achieved under all system conditions, and that the precise scope and location of further works “will depend on the solution identified” (Ofgem, 2026, paras 1.15–1.16).

Moreover, NGET’s statement that it is “confident that no works outside the scope of the Sea Link Development Consent Order project are required” (C3-002, p. 27) is not enough; evidence is required. It is concerning that NGET still cannot explain the design or the requirements to address the harmonics issue and yet states that “The final measures will also not result in any new or different significant adverse environmental effects” (C3-002, p. 28) and maintains that the filter design “was not defined in the DCO documents, nor would it have been appropriate for them to be” (C3-002, p. 27). Hidden costs and technical changes to project designs after consent are factors that contribute to poorly informed investment decisions, resulting in high cost and delays of British infrastructure projects that ultimately lead to increased costs for consumers and taxpayers. NGET’s response demonstrates why the Secretary of State should obtain a detailed statement of works on this issue prior to any further consideration of the application.

6 The responses leave questions about cumulative construction effects on the Suffolk coast, including on other ongoing NSIPs, unanswered

This small area of the Suffolk coast already hosts Sizewell C and Scottish Power Renewables' East Anglia ONE North and East Anglia TWO, with Sea Link, LionLink and other NSIPs proposed alongside them. Walberswick Parish Council describes the local constraints of limited roads, an eroding coastline, highly protected sites and no spare workforce. Walberswick Parish Council points out that Sea Link construction would periodically close the rail line just built for bringing materials to Sizewell C, as a result of the location of and access to the Sea Link converter station, and that this would delay and add to the costs of publicly financed Sizewell C during that project's busiest construction period (C1-126, p. 2). Other representations raise the effects on the visitor economy and local businesses (C1-096; C1-236, socio-economics and tourism) and the history of piecemeal connection at Friston (C1-218).

The Secretary of State has already asked the applicant how it will minimise the effects on tourism in Suffolk and Kent (Department for Energy Security and Net Zero, 2026a, para. 44). NGET maintains that there will be no significant adverse tourism effects, alone or cumulatively. It identifies liaison commitments and quarterly monitoring of workers' accommodation, with responsive measures to be agreed (C1-178, pp. 26–28). Its community fund is separate from mitigation (C1-178, pp. 33–34). **WALL does not accept NGET's position. Material cumulative effects cannot simply be set aside. Doing so visibly undermines public support for, and belief in, the green transition.**

WALL asks the Secretary of State to require NGET to set out how the cumulative assessment treats construction overlap with Sizewell C, East Anglia ONE North and TWO and other ongoing and planned NSIPs in the area, including any additional harmonic works and any delay to the Sea Link programme. NGET should reconsider its denial of cumulative effects.

7 In summary, before determining the application, WALL asks the Secretary of State to take the following steps:

- (a) **Cost:** obtain from NGET, with input from Ofgem as needed, a single reconciliation on a common price base of the cost of delivering usable and compliant 2GW capacity, including costs deferred or funded elsewhere. The consent decision concerns a project with a proposed allowance of £2.89 billion in 2023/24 prices, before any further eligible costs. The planning decision and Ofgem's funding decisions serve different purposes, but both should rest on current evidence of need, cost and deliverability.
- (b) **Benefits:** obtain the usable capacity Sea Link is expected to provide and from what date, and updated constraint benefits under consistent capacity and delivery scenarios, including full operation later than 2030, which Ofgem's December 2031 target date suggests is the most likely scenario.
- (c) **Need:** obtain a current, reconciled statement of the boundary requirements Sea Link is intended to meet, reflecting the relocation of Nautilus and consented reinforcements, without assuming projects that have not yet applied for consent.
- (d) **Alternatives:** obtain the existing technically comparable assessment of the overhead-line alternative, or a response addressing the points raised, and confirm whether the comparison of options still holds once the cost increases are taken into account.
- (e) **Harmonics:** obtain a statement of the works needed for compliant 2GW operation, their location and programme, and whether they fall within the assessed and consented envelope.

- (f) **Cumulative effects:** confirm how cumulative effects with Sizewell C, East Anglia ONE North and TWO, and other ongoing and planned NSIPs in the same small area of Suffolk Coastal have been assessed, including overlapping construction programmes, any additional harmonic works and any programme change. This should include the losses to the local tourism and business economy (C1-096; C1-236).

WALL considers that, while these matters remain unresolved, consent should not be granted.

Yours faithfully,

Walberswick Against LionLink (WALL)

Annex A: Representations drawn on

The eleven representations below, together with NGET's response (C1-178), were published on the Sea Link project page following the request for information of 28 August 2026. The summary is a guide to their content and is not a substitute for the full text.

Ref.	Representor	Matters raised	Location
C1-064	Paul Atkinson	Harmonics and converter design; need case after Nautilus; cost; overhead-line alternative	pp. 1–3
C1-073	Gordon Young	Harmonics and environmental assessment; Benhall Railway Bridge; cost, need and value for money	Sections on harmonics, Q39 and cost
C1-074	Suffolk Energy Action Solutions (SEAS)	Harmonics and EIA; need case and LionLink dependency; cost; alternative under £300m (price base not stated); NAO findings; requests for further information	Paras 3.4–3.22, 4.3–4.7, 5.2–5.4
C1-078	Rhett Griffiths	Cost and alternative; harmonics; need case; requests to NESO, Ofgem and NGET	Sections 1–4
C1-096	Fiona Gilmore	Cost; need case; harmonics; Richborough to Canterbury exclusion; tourism and local business	Throughout
C1-102	Glynis Robertson	Cost; required capacity; alternative; harmonics; NAO findings	Throughout
C1-126	Cllr Josie Bassinette, Walberswick Parish Council	Cost; need case; alternative; cumulative effects with Sizewell C; harmonics	pp. 1–2
C1-156	Jacqueline Mallender	Harmonics and capacity; complete cost; timing of benefits; cumulative effects	Sections 1–4
C1-162	East Suffolk Communities Energy Partnership (ESCEP)	Need case; harmonics; cost; alternative costed at £170m to £260m (price base not stated)	Sections 2–4
C1-218	Dr Charlotte Fox	Harmonics and converter design; history of connections at Friston; cumulative effects	Throughout
C1-178	National Grid Electricity Transmission (Applicant)	Response to the request for information: emerging converter station design, coordination with LionLink, tourism commitments; no reference to harmonics	pp. 9–15, 26–28, 34
C1-236	Susan Bridges	Whole-project cumulative assessment; tourism economy; Strategic Spatial Energy Plan; cost	Sections on Q44, Q52, Q53, Q55, Q56 and conclusion

Annex B: Cost reconciliation

The table sets out the published cost figures by price base. WALL has not verified differences in scope between the APP-320 option estimate and the Project Assessment; establishing them is part of the reconciliation WALL requests. AUCR is the ASTI Uncertain Cost Reopener, a later process through which NGET may apply to Ofgem for further funding.

Item	2018/19 prices	2023/24 prices	Source
APP-320 indicative capital cost of preferred option SL2 (2020/21 cost base)	See note	See note	National Grid Electricity Transmission (2025), Table Ex 1.1: £1,154.2m
NGET requested total cost, Project Assessment	£2,567.0m	£3,197.0m	Ofgem (2026), pp. 4–5 and para. 2.1
Ofgem proposed reduction	£245.3m	£305.5m	Ofgem (2026), pp. 4–5
Ofgem proposed allowance	£2,321.7m	£2,891.5m	Ofgem (2026), pp. 4–5

Item	2018/19 prices	2023/24 prices	Source
NGET request as a multiple of the APP-320 estimate (illustrative)	2.22	2.77	Calculated; not a like-for-like increase
Ofgem allowance as a multiple of the APP-320 estimate (illustrative)	2.01	2.51	Calculated; not a like-for-like increase
Additional harmonic mitigation elsewhere on the network	Not quantified in the consultation	Not quantified in the consultation	Ofgem (2026), paras 1.15–1.18
Richborough to Canterbury overhead line	Redacted	Redacted	Ofgem (2026), paras 2.29 and 3.65
Other items proposed for later assessment (AUCR)	Final costs not settled	Initial estimates published for some items (e.g. £51.7m archaeology; £27.9m unexploded ordnance)	Ofgem (2026), Table 1 and paras 1.20–1.21, 3.29, 3.66, 3.71

Note: the APP-320 estimate is in a 2020/21 cost base. The multiples divide the Ofgem figures in each price base by £1,154.2m and are illustrative only; a like-for-like comparison needs common scope and a consistent inflation adjustment. SEAS describes the figure as being in 2018/19 prices (C1-074, para. 3.17); APP-320 states a 2020/21 cost base. Ofgem’s Table 1 gives the 2018/19 allowance as £2,321.8m; its executive summary gives £2,321.7m.

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