

Response to the Secretary of State's Letter for Further Information, dated 22 September 2026

22 October 2026

Interested Party: [REDACTED]

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

Dear Secretary of State,

I previously submitted a representation to you on 20 September 2026 (reference C1-064). That submission set out my concerns regarding the unresolved converter station design, the emerging harmonics issues, the unproven construction access strategy at Benhall Railway Bridge, and the wider implications for need and value for money.

This final submission does not repeat that earlier material. Instead, it responds directly to the Applicant's recent statements to you, particularly their answers on converter station design options, harmonics, and construction access. It expands upon the concerns I have already raised, in light of the new information now available and the contradictions revealed in the Applicant's latest response.

As a resident living approximately 500 metres from the proposed converter station site, and as an Interested Party who participated actively throughout the Examination, I feel compelled to ensure that the full and accurate picture is before you at this final stage.

1. The Applicant has not answered your question

You asked a clear and reasonable question: whether the Applicant has identified a favoured design option for the Sea Link converter station and how that option complies with NPS EN-1, EN-3 and EN-5. The Applicant's response does not identify any favoured option, does not demonstrate compliance with the relevant policies, and does not explain how the design evolved. It offers no justification for the elimination of options previously presented to the public. Instead, it provides a rationale for not selecting a design at all. **This is not compliance; it is avoidance.**

2. The Applicant has now admitted that early design consultation was not genuine

Throughout the Examination, residents were repeatedly told that the four Sea Link design options were meaningful choices and that community feedback would influence the final design. The Applicant now states that retaining four options "*provides flexibility*" and that such matters are "*frequently determined after consent.*" This

confirms that the options presented to the public were placeholders rather than genuine choices. This approach is fundamentally incompatible with NPS EN-1 paragraph 4.7.7, which requires meaningful early-stage design engagement.

A similar pattern was evident during the LionLink statutory consultation. Residents were told that the two converter stations would be coordinated “*as far as reasonably possible*,” with emphasis on unified form, height and materials. Sea Link’s recent response now states the opposite: that the two adjacent converter stations will not coordinate in appearance or design intent. **This directly contradicts what was presented to the public and undermines confidence in the legitimacy of both consultations.**

Both Sea Link and LionLink’s Design Principles documents state that converter stations should coordinate design intent with adjacent infrastructure projects. The Applicant now asserts the opposite, further demonstrating that the design narrative presented to communities was not genuine.

3. The Applicant has not demonstrated compliance with NPS EN-1, EN-3 or EN-5

The Applicant asserts that “*principles of good design*” informed the project from the earliest stages. Yet no favoured design option has been selected, no evidence has been provided showing how each option performs against landscape, heritage or amenity criteria, and no explanation has been given for why the baseline option is now the “*likely direction of travel*.” No transparent design evolution has been presented. This is not compliance with NPS EN-1 paragraphs 4.7.7, 4.7.11 and 4.7.12, nor with NPS EN-5 paragraphs 2.4.1–2.4.4 and 2.9.18–2.9.19.

4. Ofgem has revealed a serious harmonics problem that the Applicant has not disclosed

Ofgem’s Sea Link – Project Assessment (1 September 2026) states 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.”

Ofgem further states that the activities proposed by NGET “*do not fully resolve the harmonics issue*” and that additional activity will be required elsewhere on the transmission network. This means Sea Link cannot currently operate at its full 2GW rating, and that the converter station design may require significant changes, including additional offsite reinforcement.

The Applicant has not disclosed this to communities, nor has it explained how unresolved harmonics affect building form, massing, roof design or equipment layout.

Its response to you does not mention harmonics at all, despite Ofgem stating that the issue threatens the deliverability and performance of the project.

5. Harmonics directly affect converter station design

The Applicant states that design constraints “*cannot be understood in full*” until detailed design and equipment selection are complete. Yet Ofgem confirms that detailed design has already revealed a fundamental technical problem. If additional harmonic mitigation equipment is required, larger filters, additional banks or offsite reinforcement, then building footprints, heights, roof forms, internal layouts and external massing may all change.

You are therefore being asked to approve a design envelope that may not be deliverable.

In its 16 October response, the Applicant downplays the issue, presenting harmonics as a routine matter that will be resolved during detailed design. That is not consistent with Ofgem’s findings. Ofgem explicitly states that additional activity will be required elsewhere on the transmission network, although the precise scope and location will depend on the solution identified.

Ofgem goes further, stating that Sea Link will only be considered “*successfully delivered*” if it can operate at its full 2GW rating without derating due to harmonics. If harmonics force constrained operation, the project would fail to meet its licence deliverables. A project whose technical deliverability is uncertain cannot be said to meet NPS EN-1 or EN-5.

Given the scale of the converter station, the proximity of residential receptors, and the interdependence between harmonics, noise, building form and equipment configuration, it is essential that you have full clarity on this issue before reaching a decision. The Applicant’s current framing does not provide that clarity.

6. Benhall Railway Bridge – a critical unresolved deliverability issue

You asked whether a structural survey of Benhall Railway Bridge had been completed. The Applicant’s answer shows that no survey has been completed, that Suffolk County Council has not yet signed off the Approval in Principle, and that only after that will a meeting be arranged to “*find a date for the survey.*”

During Examination, the Applicant identified two options, a temporary “mini-bridge” or minor works, but admitted that further study would be required to define any remedial works. Suffolk County Council expressed significant concerns about feasibility.

The Applicant therefore cannot confirm whether its preferred construction access route is structurally feasible, what scale of works may be required, or what environmental and traffic impacts would arise. Compounding this uncertainty, the Applicant has provided

no evidence of coordination with Network Rail or Sizewell C's rail-freight programme, despite planned heavy freight movements on the East Suffolk line. Any bridge works or abnormal indivisible loads must be compatible with these operations, yet no such compatibility has been demonstrated.

It is also disappointing that the Applicant has not given meaningful consideration to the credible Northern Access Route proposed by Suffolk County Council. That alternative would avoid the structurally constrained Benhall Railway Bridge, reduce construction traffic through Saxmundham, and avoid some of the most sensitive areas of the Fromus valley. Instead, the Applicant continues to promote an access strategy that may require a new permanent road and new bridge across a valued rural landscape, a prospect that is deeply distressing for those of us who live nearby and who will bear the long-term consequences of such an intervention.

This is a fundamental deliverability issue left unresolved at the point of decision.

7. Costs have escalated to £3.2 billion

Ofgem confirms that the total allowance requested for Sea Link is £3.197 billion, compared with £1.157 billion used during the DCO Examination. This escalation fundamentally alters the value-for-money assessment, the justification for the project, the comparison with alternatives and the deliverability of the design.

Yet the Applicant's response does not acknowledge this cost explosion, nor was this substantially higher figure disclosed to the Examining Authority during the Examination, despite being presented to Ofgem at that time.

8. A pattern of inadequate disclosure and disregard for affected communities

Across the Examination, the Applicant repeatedly provided incomplete, shifting or outdated information, and consistently deferred or withheld material that communities needed in order to participate meaningfully.

Residents were asked to comment on design options that were never real, to assess visual impacts without a deliverable design, to consider construction access without a completed bridge survey, and to engage in an Examination where the true cost of the project had already doubled but was not disclosed.

We now know that a fundamental harmonics problem was identified during detailed design and procurement, yet this was never raised with the Examining Authority or with the public. Even when directly asked by you for "*any other outstanding or relevant matters,*" the Applicant stated that it had "*no further response.*"

For those of us who live beside the proposed converter station, in my case just 500 metres away, this pattern has felt deeply disrespectful.

9. A respectful plea

You are now the final decision-maker. There is no further safeguard and no further opportunity for communities to ensure that the full truth is before you. I therefore ask respectfully that you satisfy yourself personally and professionally that you have all necessary information before granting consent.

This part of coastal Suffolk is already carrying an extraordinary and unprecedented concentration of major infrastructure: Sizewell C; EA1N and EA2 at Friston; two NGET substations; the proposed LionLink converter station; the proposed Essex & Suffolk water pipelines for Sizewell C; and now Sea Link, alongside the 800-plus home “garden neighbourhood” for Saxmundham. For a small rural area, this represents a cumulative burden that no other community in the country is being asked to bear.

Throughout the Examination, residents were repeatedly asked to engage with information that was incomplete, shifting or withheld. That has undermined trust. Given your longstanding commitment to community legitimacy, transparent decision-making, and fairness in how national policy is delivered locally, I respectfully invite you to visit the area yourself. Only by seeing the landscape, the villages, the constrained road network and the cumulative footprint of existing and proposed infrastructure can the full context be appreciated.

For those of us who live closest to this development, the consequences of an approval made without full information would be irreversible. Once this landscape is industrialised, it cannot be restored. I therefore ask, respectfully but firmly, that you ensure all outstanding evidence is obtained and scrutinised before any consent is granted. Only then can communities have confidence that this decision reflects the full truth and upholds the principles of fairness, transparency and legitimacy that you have consistently championed.

Yours sincerely,

Paul Atkinson

