

Application by National Grid Electricity Transmission plc ("the Applicant") for an Order granting Development Consent for the proposed Sea Link project ("the Proposed Development")

Response to the Secretary of State's invitation to comment on responses to the request for information: Sea Link Ref: EN020026

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: Snape Parish Council

Interested Party reference: [REDACTED]

Email: [REDACTED]

1 **Introductory**

- This document is the response of Snape Parish Council to the Secretary of State's invitation to comment on the responses to the earlier Request for Information (RFI). We were not one of the parties originally asked for response, but have previously made several submissions to the Examination.

We have now reviewed a number of the responses to the original RFI including the Applicant's recent summary response and comments [C3-002], and we would like to make some final comments on common themes that support our earlier responses, and which in our view indicate serious flaws in NGET's DCO application.

- We note primarily that we have been disappointed once more to see that many responders have put emphasis on NGET's failure during and after the Examination to actually meet objections and deal with serious alternatives raised over the past two or three years by local communities, both as individuals and through representatives. The standard response from NGET time and again seems to have been that the objections and criticisms are either insignificant, or have been met within the original documents of the DCO application. There has been very little amendment or new material to meet serious and positive arguments made.

- We therefore set out below some Interested Party arguments that we hope will encourage the Secretary of State to defer a decision on the DCO application until these, and other matters raised by Statutory Consultees have been independently reviewed, and a truly strategic solution to the present actual issues in East Anglia has been put forward.

2 **Outstanding issues queried by Interested Parties:**

- National and Regional Strategic Planning – Sea Link was planned under the 2022 Energy security Strategy, which is now very much out of date. The national Strategic Spatial Energy Plan will be published in 2027, and Sea Link could be deferred until the plan is ready without damaging progress towards Clean Power 30;

- **The Needs Case and Alternatives** – many IPs have noted that it is not certain that the original needs case is not apparently now valid since other changes have occurred. We have also seen credible alternatives put forward that have not received adequate review during the Examination. If it were possible to lower the impacts on East Suffolk at the same time as saving significant expenditure, would it not be worth deferring for a review of these matters?
- **Project costs** – the recent Ofgem Project Assessment has raised the level of funding at 2023/24 levels to nearly £3bn, from earlier estimates at 2018/19 prices of £1.1bn. This is a really significant added cost impact, and it is accompanied in the Ofgem Assessment by an indication that even at these levels of expenditure the project cannot currently guarantee delivery of the scheduled 2,000MW reinforcement. Many IP responses have noted this, and the NGET response (in C3-002) is not really detailed enough to remove these concerns. It would surely seem prudent to defer the decision until this new issue has been resolved, and its potential impacts assessed and mitigated if necessary?

Respondents have suggested earlier in the Examination that Ofgem should provide and publish a full, project-specific cost-benefit analysis of the updated expenditure against the impact on actual network conditions after implementation, including both current and forecast network improvements, and we add our request to theirs.

- **Cumulative impacts** - NGET have throughout the examination minimised the significance of its programme of works and their impact by relentlessly comparing Sea Link to the much larger SZC project. This approach is applied similarly to the temporary, but extensive period, in which up to nine NSIPs could be building infrastructure in an area with limited transport alternatives and fragile ecologies and environments. Interested Parties have repeatedly noted that the *quantitative* impacts of each additional, contemporaneous NSIP are more important (and time-sensitive) than the *marginal* or *comparative* impact; but we have yet to see NGET recognise locally knowledgeable impact assessments by any deviation from its claim that all, for example, traffic impacts are ‘insignificant’ or easily mitigated.
- **Wider economic concerns**, well-founded and well-evidenced during the Examination, have been expressed repeatedly by local businesses and regional industry bodies about the impact of Sea Link on the tourism industry – again without effective response or engagement. There are other similar industry and economic ‘Sea Link’ effects on the Heritage Coast, and this raises the larger question of the value for money of the project as a whole – the [project is required to be compliant with NPS EN-1, and so must be both *efficient* and *economical* - the NPS applies equally to critical national priority projects and their residual impacts. Where there is doubt over the strategic necessity of the project, and concerns over its cost, together with an Ofgem assessment that notes that the project cannot at the moment see any detailed way forward to deliver at its target levels; and a National Audit Office report that is both critical of the selection of ‘projects in development’ for ASTI funding selection, and of the lack of ‘an integrated spatial plan or whole-system appraisal’, then we think it is reasonable to say that the Applicant’s case has not yet been made, and deferral of approval would be justified until it has been made.

- **Missing or inadequate solutions to technical issues** – apart from the issue raised by Ofgem over ‘harmonics filtration’, there will need to be legal, practical and economic solutions to other deferred problems in the current submission. These include the use of Benhall Bridge and the new Fromus bridge for ALL delivery (no survey of Benhall Bridge has yet been carried out to discover whether this is feasible), the lack of actual design detail for the converter stations, and lack of detail similarly in landscaping and visual impact proposals, which do not yet comply with NPS design criteria..

3 Conclusion

- In the light of these issues, and emphasising once again the very disappointing response of NGET to interested parties and their positive attempts to engage with the Applicant over defects in their proposals, we respectfully request that there be a delay/deferral of any decision on the Application, so that further review of the outstanding questions can remove any uncertainty over the project’s effectiveness, efficiency, value for money and adequate mitigation for its residual effects.

Snapes Parish Council

22/10/2026