

To: Secretary of State for DESNZ Miatta Fahnbulleh

From: [REDACTED]

Re: EN020026

Dear Secretary of State

Thank you for the opportunity to respond to the latest developments and responses to the SeaLink DCO. I have previously taken an active part in the Pre-application Consultation, and the DCO hearings. The aspiration for the process (as an NSIP) to be 'front loaded' and enable communities affected to engage, and co-create appropriate mitigation has not been met. The application was not ready for examination and remains woefully incomplete with many issues outstanding. I hope you will pause the process and re-evaluate. My rationale for this includes the following evidence, and my lived experience.

Assessment of Harm

The Developer has consistently down-played any negative impacts of the project, this includes; traffic volumes, noise/vibration and light pollution, harm to the environment/wildlife, our vital tourism economy in an area known for its tranquillity and AONB/SSSI (which should be subject to the highest exception test) and the mental health and well-being of individuals. At various stages they adopted the 'Rochdale Envelope' approach when it suited them, but never to predictions of harm.

I will not repeat the evidence provided to the Planning Inspectorate which I am sure you have read and share our concerns. Recent new evidence of potential harm from Frequency Noise & Vibration (LFN) has not been considered or evaluated. Just because the Developer is not mandated to measure does not mean that harm will not be caused. LFN as you will know is associated with anxiety, stress, cardiovascular stroke, irritability, distress and depression. The local communities are already under extreme stress from the multiple NSIPs, which is made worse when one has no agency or opportunity to influence.

The cumulative impact of all the energy NSIPs approved and in process/anticipated has not been adequately assessed. SeaLink and LionLink are separate, consecutive DCO applications yet they both connect into proposed Substations at Friston (Kiln Lane) and Converter stations at Saxmundham. Concern is that additional projects such as solar farms and battery storage (Hornsea 3 demonstrates how battery storage is added post consent) will also be added creating a huge energy hub, which had it been proposed initially, in a transparent and honest way, would not have been approved - as the overall harm in a very small geographic area exceeds benefit. Such industrialisation is unprecedented, and would be able to be located elsewhere while still meeting UK PLC need, to cost and to time.

Failure of initial connection offer by NG which underpins the whole application and proves SeaLink is not needed

Scottish Power Renewables (SPR) was issued a connection offer for EA1N and EA2 to connect to the 400KV line in the Friston area, resulting in the application to build new substations/energy hub in the small hamlet. Stating that there was capacity to connect. However, we are now told that SeaLink (interconnector) is needed to take the excess energy which has been brought ashore via a cable run - which then cannot enter the 400KV line at Friston (now called Kiln Lane) – away again to a new Converter station to be built at Saxmundham with cable runs between them and across to the coast

to go back out under the seabed to Kent. Both statements cannot be true: Either there is capacity to connect and SeaLink is not needed, or if there is not (and SeaLink is needed) then the SPR DCO was consented on an inaccurate basis.

Failure by NG to upgrade the pylon network despite huge profits, and lack of strategic plan for the UK's energy needs

NG has failed to invest and upgrade the transmission network (pylons) to respond to where the energy is now being created despite full knowledge of this. A pause would enable the UK to make use of emerging technologies and offshore converter station platforms etc. which would be more sustainable long term, and overall cheaper while still enabling the UK to meet net zero targets.

Successive Governments have not mandated Developers to work together. Individual projects are competed and assessed in isolation. An example in the SeaLink application was that the previously agreed landscape design for SPR DCO had to be renegotiated to make way for SeaLink. Friston was approved only for SPR's application and PINS Inspectors commented that that application only just met the benefit/harm balance and that any future development should be very carefully assessed. Also, SeaLink's plans to use the Benhall Bridge will interrupt trains bringing aggregate for the Sizewell C nuclear (SZC) project (use of trains is to reduce unacceptable volume of HGVs and AILs). Again, within your gift Madam is to rule for a pause to re-evaluate provision of renewable energy, associated infrastructure and networks/interconnectors.

Unresolved issues and Harmonics issue

There are many issues that are unresolved including; whether HDD will be possible under RSPB North Warren, Protective Provisions remain not fully agreed with Suffolk County Council (SCC), the design of structures is unclear so has prevented effective assessment and subsequent agreement of mitigations.

Even with the largest filters in place OFGEM has stated that this will not solve the issue of Harmonics. The close proximity of infrastructure is unsolvable. Concern is that the Developer will either seek to reduce the capacity output – which will further reduce the benefit analysis. Or that they will increase the footprint of land taken, which would be a material consideration and require a revised application and new consultations, and again distort the cost/harm versus benefit analysis.

Findings of the Independent Inquiry led by Stephen Holliday

In conclusion I would respectfully ask that you read the findings of this report (link below) with regard to infrastructure licensing and regulation. Mr Holliday highlighted that some complex industries (such as Energy and Health) and their most senior leaders are unwilling to receive bad news and have a bias towards evidence that supports their agenda. And that they should take robust steps to seek out evidence and listen directly to those with lived-experience and not believe what they are told by their Officers. I believe the same ethos and approach that led to the failed Magnox competing contract by the Nuclear Decommissioning Authority (NDA) and at length department of DESNZ, could also apply in this case, where you as Secretary of State for DESNZ may be unwilling to hear the bad news, that does not support your agenda for approval of NSIPs, from individuals like myself, who have been cruelly labelled as 'blockers' and are the only person in the crowd saying 'the King is wearing no cloths'....or in this case; the financials/numbers don't add up, there are too many unknowns, there are other viable/affordable options, you can achieve a better longer term solution without the harm this project will cause.

[Magnox Inquiry: final report - GOV.UK](#)

Please pause and strategically reconsider.

Yours sincerely,

Marianne N Fellowes MBE