

[REDACTED]
South East Anglia Link

FAO: The Secretary of State for Energy Security and Net Zero,

c/o Energy Infrastructure Planning Delivery Team, Department for Energy Security and Net Zero

Application reference: EN020026

Response to the Secretary of State's invitation to comment on responses to the Request for Information [EN020026]

From: East Suffolk Communities Energy Partnership

Interested Party reference: [REDACTED]

East Suffolk Communities Partnership - ESCEP - is a partnership of over 30 East Suffolk town and parish councils, led by a steering group. We seek to share the knowledge and understanding and commitment of our town and parish councils members in preparing responses to NSIP applications in East Suffolk, and have been acting as an Interested Party throughout the Sea Link DCO Examination.

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

ALL INTERESTED PARTIES – INVITATION TO COMMENT – 26/09/2026

1 Introductory

- This document is the response of East Suffolk Communities Energy Partnership to the Secretary of State's invitation to comment. We were not originally one of the parties asked for response, but have previously submitted a note [C1-162] on the original RFI. We have now reviewed the generality of responses to the original SoS invitation to

comment and have identified a number of significant common themes that support our earlier responses, and which, in our view, indicate substantive deficiencies and flaws in NGET's DCO application.^[1]

- We have also been disappointed to see how many responders have emphasised the lack of serious attention from NGET to the issues raised throughout the Examination, and the lack of any development of the DCO to meet credible and well-intentioned criticism of the original Application documents. Most often throughout the Examination, Invariably NGET has responded to criticism of DCO Application statements or arguments merely by referring back to the original documents, and there has been scant amendment in response to arguments made, or even recognition of the arguments.

- We therefore strongly recommend that the Secretary of State should defer a decision on the DCO application until these, and other matters raised by Statutory Consultees have been independently reviewed, and a true strategic and community focussed solution to the current, actual issues in East Anglia has been put forward.

2 Topic Areas

- We comment briefly on the following five areas, in each case noting that there has been a notable lack of appetite from the Applicant to respond to positive critical comment and review:

- The missing strategic plan;
- Mitigation both environmental and financial;
- The needs case, and alternative solutions to those needs;
- Project costs, and the extent and timing of potential benefits;
- Wider economic/cumulative impacts;
- Technical deliverability, and missing or inadequate solutions to design and technical issues

3 Lack of a current Strategic Plan

- Sea Link is one of the 26 Accelerated Strategic Transmission Investment (ASTI) projects, and thus was planned under the April 2022 'British Energy Security Strategy'. That strategy has been essentially discarded since the October 2024 establishment of NESO, with plans for the preparation of a new Strategic Spatial Energy Plan (SSEP),

originally due in Autumn 2026. This strategy, described by DESNZ as ‘a fundamental shift in how we plan our energy systems’, has also been deferred since the release in November 2025 of refreshed energy generation cost data that has required significant alterations, apparently, in the six *Pathway Options* being considered for the SSEP. These have now been delivered, although they are not, for whatever reason, being published.

- The SSEP is now planned to be released after consultation in the Autumn of 2027, with the dependent *Centralised Strategic Network Plan (CSNP)* and the *Regional Strategic Energy Plans* following in due course at the end of 2028. The current strategic planning document therefore appears to be the second ‘refreshment’ of the transitional CSNP (tCSNP2r), approved by Ofgem earlier this year. This is designed to deliver the *Beyond 2030* programme set out in March 2024 under the Conservative Government.
- The assumptions, under which Sea Link has been put forward no longer apply, especially since the refreshed energy generation costs exercise in 2025. If there were any chance at all of deferring the consideration of the present Sea Link business case until a national strategic plan were in place, it would be sensible to make that decision – and as any number of Interested Parties have pointed out, there is indeed a very good reason to defer the programme, since there is no urgent needs case for the 2,000MW that Sea Link is intended to, but apparently cannot, fully deliver.
- We believe the ASTI and ‘Critical National Priority’ status of an interconnector project that delivers ‘reinforcement’ but no additional generating capacity could be questionable were the full national and regional strategies in place at this time.

4 Mitigation

- We remain concerned that environmental mitigations, particularly with regard to highways and landscape are inadequate.

The local highway network in Suffolk is already overloaded from Sizewell C, the Scottish Power projects, the National Grid substation/connection hub at Friston and a number of solar projects outwith the NSIP process. This is in an area where further energy projects and housing projects are planned alongside Sealink. The existing projects have already resulted in multiple road closures, congestion, and increased traffic and “rat running” on unsuitable rural roads. There needs to be an independent review on whether the road network will be able to cope and pavements structurally survive. Given the current, and anticipated worsening, highway problems with new NSIP DCOs such as Sealink, SCC Highways clearly needs considerably greater government funding for capital works and staff resources to attempt to adequately mitigate the issue. A road network which is increasingly gridlocked and results in increased road casualties is in nobody’s interests.

The rural landscape in East Suffolk has already been irrecoverably damaged by existing projects and the introduction of yet further vast industrial scale infrastructure into a rural landscape cannot be adequately mitigated by the planting of trees and hedgerows which will take decades to have any substantial mitigating impact.

In terms of financial mitigation, the sums on offer are derisory and bear no comparison to the economic loss that will be suffered by communities and individuals. There has been no analysis by NGET of the true economic damage which Sealink will cause to the communities and individuals directly and permanently affected by this project.

Government guidelines, which in any event should be regarded as a minimum, are based on flawed social research which DESNZ officials are aware of.

5 The needs case

- We notice that many of the responses to the SoS's Request for Information emphasise once more the lack of any response from NGET over the course of the Examination to questions arising about the actual need for the interconnector, its lack of detailed and accurate estimation of the boundary capacity issues, and its apparent reluctance to consider alternative solutions at very different scale and cost. The original needs case for 1,852MW Friston export deficit depended on the 1,500MW pressure on the system that Nautilus represented, but Nautilus had been taken out of the equation *before the DCO application was submitted*. Interested Parties have been asking NGET to recognise and accept this flaw in its case since the first day of the Examination.
- The overriding and pressing justification for a deferral of approval of the current Application is simply that the evidence we have reviewed indicate there is no case for urgency – the residual 352MW worst-case deficit will not arise until the late 2030s. The Ofgem proposal for a 'backstop date' of 2035 against an underlying assumption of delivery in 2031 clearly shows that there is time to review and re-design the reinforcement that may be needed after that date.

6 Project costs, and the extent of potential benefits;

- The question of costs has been a major frustration for Interested Parties throughout the Examination process, with NGET basically refusing to update its 2018/19 £1.1bn estimate for any public discussion of value for money or affordability. The grant of Early Contract Funding was opposed by many Interested Parties, but was the only (although heavily redacted) indication of future cost estimates that was available to the consumer/payers of the proposed costs until the Ofgem Project Assessment was

published in September 2026. The costs then appeared to have doubled (in 2018/19 prices), and NGET now requested £3.2bn (in 2023/24 prices).

- The benefits to *local* consumers who will host the infrastructure of Sea Link are not obvious, and consist almost exclusively of national targets for energy security and system reinforcement. The proposed direct local contribution from NGET of £1.06m in community benefits for Suffolk and for Kent amount in total to just under $\frac{7}{100}$ of 1% of the project spend.
- 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.

7 Wider economic/cumulative impacts;

- NGET have throughout the examination minimised the significance of its programme of works and its 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.
- Similar 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 or proposals for effective mitigation of residual impact. 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
- Sea Link must be compliant with NPS EN-1 and be both *efficient* and *economical*, and the NPS applies equally to critical national priority projects and their residual impacts. Where there is doubt over the strategic necessity of the project;
- an Ofgem assessment that notes that the project cannot at the moment see any detailed way forward to deliver all at its target levels; and

- a National Audit Office report that is both critical of the ‘projects in development’ 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.

7 Technical deliverability, and missing or inadequate solutions to technical issues.

- In our view it is completely unsatisfactory that serious design questions, affecting both the overall deliverability of the project, and specific infrastructure, should remain unanswered after the end of the Examination process, or still worse should only be revealed publicly at that stage.
- The project as it was examined has now been declared by Ofgem, with NGET’s implicit assent, to be undeliverable without further research and the *uncosted* and *unlocated* delivery of additional infrastructure. There is no actual, proposed solution to the ‘harmonics filtration’ issue that was disclosed publicly for the first time in September 2026 in Ofgem’s Project Assessment documents, and without a solution Sea Link will not be able, we now find, to deliver the full, designed 2000MW. It surely cannot be possible to accept the Sea Link submission until a specific and detailed solution to this problem has been devised, tested and independently reviewed, and its various impacts (including cumulative impact) assessed and mitigation proposals drawn up.
- Before this point is reached, there will need to be legal, practical and economic solutions to other deferred problems in the current submission. These include:
 - (i) the use of Benhall Bridge and the new Fromus bridge for AIL delivery – no survey of Benhall Bridge has yet been carried out to discover whether this is feasible, and there are other considerable problems associated with accessing the converter stations that were not disclosed when choice of the access route was being considered at the statutory consultation;
 - (ii) the actual design of the converter stations still remains inadequate, and NGET have supplied broad statements of future compliance with design principles without committing to any character or detail of the buildings;
 - (iii) similarly, design and siting of landscaping and visual impact proposals are not yet in sufficient detail for compliance with the criteria for good design in NPS EN-1 para 4.7.7 [\[2\]](#).

8 Conclusion

ESCEP recognises the necessity for change and the upgrade of the National Grid, but after reviewing the wide range of responses to the Secretary of State’s RFI, we must note once again the very disappointing response of NGET to Interested Parties and their positive attempts to engage over defects and deficiencies in NGET’s proposals. We accept that there will be local impacts on our communities; but we must agree with other IPs that there are clear opportunities to make changes to the DCO that would reduce these impacts and allow for greater mitigation of their effects.

We therefore respectfully request that there be a delay/deferral of any decision on the Application, and that there be further review of these outstanding or unanswered questions before a final decision is taken.

References:

We have reviewed a number of NGET responses to the RFI, and also (in particular) responses from the following IPs:

<i>C1-169</i>	<i>Suffolk County Council</i>	<i>C1-055</i>	<i>Aldeburgh Town Council</i>
<i>C1-056</i>	<i>East Suffolk Council</i>	<i>C1-162</i>	<i>ESCEP (previous response)</i>
<i>C1-237</i>	<i>Snape Maltings (H Young)</i>	<i>C1-126</i>	<i>Walberswick PC</i>
<i>C1-15</i>	<i>Jacqueline Mallender</i>	<i>C1-074</i>	<i>Suffolk Energy Action Solutions</i>
<i>C1-218</i>	<i>Dr Charlotte Fox</i>	<i>C1-236</i>	<i>Susan Bridges</i>
<i>C1-241</i>	<i>Nicholas Bridges</i>	<i>C1-243</i>	<i>Alison Downes</i>
<i>C1-073</i>	<i>Gordon Young</i>		

[\[1\]](#) See table at the foot of this document.

[\[2\]](#) We refer SoS to Nicholas Bridges’ submission [C1-241] for an extended summary of these design issues.