

SUFFOLK ENERGY ACTION SOLUTIONS'**REBUTTAL TO NGET RESPONSE TO SEAS RR
ALTERNATIVE SITES****SEA LINK: EN020026****SEAS IP:** [REDACTED]**DEADLINE: 2 – December 9, 2025****Date: 9 Dec 2025**

This document constitutes SEAS rebuttal to the Applicant's Response to SEAS Relevant Representation [\[RR-5210\]](#), as set out in:

**[\[REP1A-043\]](#) - 9.34.1 Applicant's Comments on Relevant Representations
Identified by the ExA - Specifically Table 2.50 SEAS Alternative Sites**

Introduction and Summary

1. The Applicant's response to SEAS' Relevant Representation on Alternatives (which is within RR-5210) is, it seems, ultimately to be found in REP1A-043, at Table 2.50 and "Appendix B" (NGET Response Alternatives). It appears REP1A-043 supersedes REP1-111, but this is nowhere clearly indicated. Equally, Table 2.50 refers variously to "Appendix 3", "Appendix 2" The position is confused, and confusing for SEAS and the public generally.
2. This document is SEAS's rebuttal to NGET Response Alternatives.
3. NGET Response Alternatives is founded on a remarkable, and manifestly incorrect, assertion regarding the NGET needs case for the Proposals, namely that the needs case:

is not changed by the exclusion of Nautilus from the Sizewell Generation Group.

In circumstances where the articulated justification for the Proposals, with one end at Sizewell, is set out in APP-320 as the need to export 1,852MW of excess generation from the "Sizewell Generation Group", yet 1,500MW of that is Nautilus, the Applicant's assertion is staggering. It is indicative of an applicant that refuses to engage with the facts, in particular changes in the facts that do not suit it.

4. The Applicant's need case for something in the Sizewell area boils down to NGV's LionLink project being contracted to come here, yet LionLink is only planned for here because of Sea Link. The bizarrely bootstrap nature of the "need case" (appropriate for what is a sub-sea bootstrap) is then compounded by the Applicant's failure to acknowledge that the (mere) 352MW "worst case fault" shortfall by the late 2030s (which eventuates only with LionLink at Sizewell), could be met by the cheap and environmentally friendly alternative of upgrading existing infrastructure.
5. Given the Applicant's 1,852MW need case has disappeared, the Applicant must re-do its alternatives exercise to reflect the reality.

6. If the Applicant continues to refuse to do so, respectfully the ExA should insist: the EIA Regulations are robbed of any meaning if the alternatives considered by the Applicant relate to a needs case that no longer exists.
7. It remains the case, as SEAS has argued in its RRs and generally, that the loss of Nautilus and the resultant loss of the Sizewell need case, means that “macro” alternatives must and should include options that include upgrading of existing infrastructure, or brownfield sites closer to where there might be demand for any excess coming out of Kent.
8. The Applicant’s refusal to recognise the disappearance of its needs case means it has not engaged with SEAS’ macro alternatives case in any meaningful way (the Applicant simply insists the need has not changed and directs the reader to the need), and this Rebuttal does not repeat SEAS’ existing evidence there unnecessarily: it is for the Applicant to meet it, rather than dodge it by denying the reality.
9. This is dealt with in the short “Part 1” below.
10. As such, this Rebuttal is mainly concerned to address Appendix B, which is concerned with the fictional world in which the Applicant’s need case for the Proposals still exist, and contains the detail of NGET Response Alternatives to SEAS’ local alternatives case regarding Site 4 (former RAF Leiston) (REP1A-043 starting at electronic page 423). However, Appendix B mainly consists of references to the original process documents, and assumes that repeating the Applicant’s case will somehow strengthen it. Whilst it purports to justify the Applicant’s alighting on Site 3 (Saxmundham) for the Proposals, and its rejection of local alternative Site 4, former RAF Leiston, in fact it fails to do so. We explain why former RAF Leiston must be preferred to Saxmundham if (if) the Proposals go ahead.
11. In any event, even the fictional need world of Appendix B draws us back to need. That is because in Appendix B the Applicant spends much time asserting (implausibly) that it had nothing to do with the Applicant’s decision to alight on Site 3 (Saxmundham) that: (a) Nautilus was intended to go there too; or (b) that Saxmundham was part of the Nautilus site exercise that the Applicant carefully reviewed before it decided on Saxmundham.
12. In so far as there is anything to address outside the issue of need (which we deal with separately), and the fictional Appendix B world in which the need has not disappeared, we sweep that up too.

PART 1 SEAS’ case against the late inclusion of Site 3 (Saxmundham), which late inclusion has not been properly tested against other alternatives.

13. This general response from NGET (at their ref B.2.1), responds to the SEAS case in four main areas, and we will use NGET’s numbering for reference.

B.2.3-B.2.7 The late introduction of the Saxmundham site (Site 3)

14. SEAS entirely agrees that *'Project development is an iterative process'*, at least it should be, but these Proposals are a paradigm case of a developer failing to iterate, in the face of a changed reality (e.g. no Nautilus).
15. We reject the Applicant's claim that the current iteration of the Proposed Project has been based on the factors and processes noted in B.5.2.3. In our Written Representation (REP1-282, 2.6) we explain that the basis for the main alternatives selected by NGET (in App-044, *Main Alternatives Considered*) was their view from the outset that there would need to be a new common node for a group of Sizewell area connections; and it is evident that this view remained **unaltered** even when it became clear in November 2024 that one of the group (Nautilus) would be connecting elsewhere.
16. As far as the suggestion that Site 3 at Saxmundham was identified as a result of 'encouragement' from the County and District Councils, we can find no evidence in those bodies' responses to statutory or non-statutory consultation that would support this statement. It is clear on the other hand that that SCC emphasised from the outset (Non-Statutory Consultation; Suffolk County Council Response Dec 2022) that closer attention should be paid to co-ordination between the Proposed Project and other similar developments. We note also that SCC in Cabinet (May 13th 2025) described the Applicant's approach to engagement as *'dismissive and high-handed'*, *'unhelpful'* and *'intransigent'*, but this does not seem to be referenced in Appendix B.
17. The claims in B.2.6 regarding feedback in consultation on the co-ordination of projects in Suffolk and Kent is a partial view on a statutory process that, for example in APP-301 Consultation Document 8.4.10, revealed that 65% of respondents did not agree that Sea Link would be in the right location, and that many more were in favour of co-ordination offshore rather than co-location onshore. We note also that the claims regarding NGET's approach to co-ordination made in B.2.7 are scarcely borne out by App-363, Co-ordination Document at 3.2.3 & 3.2.4:

'...On 12 November 2024, Ofgem announced that it had approved the Initial Project Assessment (IPA) for the NGV interconnector Nautilus at the Isle of Grain, Kent, rather than at Friston Substation in Suffolk..... Reference to Nautilus is therefore retained within this Document to demonstrate how National Grid has sought to co-ordinate with other projects, even though they are no longer going to be located in the proximity of the Proposed Project...'

While the relocation of Nautilus removes the last shred of justification for a Sizewell group- connection node, that project's ghost remains in the project documentation to justify co-location and call it co-ordination.

Conclusion: SEAS' case as summarised in REP1-282 2.5-2.6 stands against these objections, which are in the main merely re-statements of the Applicant's original position.

B.2.8-B.2.11 NGET's reliance on the Nautilus non-statutory consultation

18. In these sections the Applicant asserts that they carried out a genuine exercise to review and potentially change their siting decision as a result of stakeholder feedback, although NGET once more confuse co-location with co-ordination. The claim that the 'Nautilus' sites and the 'initial' sites were not exactly contiguous is not in any way a rebuttal of our demonstration (for example in RR-5210, Executive Summary para (r)) that their APP-044 para 3.6.3 clearly justifies the review and re-identification of sites on the basis of the Nautilus non-statutory consultation. We quote it in full here for clarity:

3.6.63 National Grid backchecked and reviewed all potential converter station site option areas that were identified independently through both NGV's non-statutory consultation for the Nautilus Project and the routeing and siting option appraisal for the Proposed Project described above. This backcheck and review considered whether it was feasible for any of the converter Areas to accommodate up to three co-located converter stations and whether there were any additional sites that should be investigated/appraised further for co-location opportunities (our emphasis)

- 19 It is wholly implausible to claim that this review of 'all potential converter station site option areas...identified...through...the Nautilus Project' was not the reason the Applicant then, suddenly, alighted on Saxmundham. Although this section of Appendix B simply repeats the Applicant's reliance on APP-368 CPRSS and APP-044 Main Alternatives Considered, it is sophistry to seek to draw a distinction between a 'review' of sites that included Saxmundham, and what it was that 'form(ed) the basis' for the decision to alight on Saxmundham. The little tip-tap-tapping noises the ExA will hear on reviewing para B.2.10 are in fact the sound of an unknown number of lightly-shod angels dancing upon the head of a pin, as we read that '...whilst the Nautilus non-statutory consultation converter station sites **were reviewed** as part of the siting back-check exercise, they **did not form the basis of the decision-making** and **were not relied upon.**'

Conclusion: SEAS' case that the late switch to Site 3 was squarely based on the potential co-location of Nautilus and other projects in development following the review and back check process stands, against these vague and illogical claims that the 'review' was irrelevant to the decision that was based upon it.

B.2.12 Unreasonable failure to assess the Saxmundham option against alternatives that reflect the changed reality of the “need” case for the Proposals (that, so far as Sizewell is concerned, it has gone).

- 20 There is no argument here to meet the SEAS objection summarised in RR-5210 Executive Summary para (u), where we point out that the reality of the removal of the need case as regards Sizewell means that reasonable alternatives (or true comparators) should include projects at all scales, from the integrated offshore grid to the ‘whole northern package’, standing against the false concept of reinforcement for a Sizewell group connection hub, down to the local alternative at the former RAF Leiston site. In essence the Applicant’s argument consists of a single reference to APP-368, and we therefore still await their response to our detailed Representation.

Conclusion: No new information has been offered to respond to our case.

B.2.13-B.2.14 NGET’s claim that the elimination of the planned Nautilus connection in Suffolk was irrelevant to site selection.

- 21 These two paragraphs seek to show once more that the switch of the Nautilus project away from a Suffolk landfall is, in essence, immaterial to the appropriateness of the selection of the Saxmundham site, which depends on a further claim that ‘Site 3’ had been identified as the best site for the project at the earliest stages. The Applicant’s reference to the OSDER document (APP-369, 6.3.1-6.3.4) shows indeed that Site 3, the Saxmundham Converter station, had by then become at least their ‘emerging preference’.

The Applicant has failed, however, in this section, to consider SEAS repeated demonstration that the fundamental basis of options appraisal and site selection was fatally flawed.

- 22 At the very outset, (see for example our RR-5210, Exec Summary paras (l)-(q)) the Applicant’s consideration of options was driven by the assumption that there was a needs case for a common Sizewell area node – for Sea Link, and for Nautilus and Lion Link as well.

It does not matter how early, or late, it was that the Applicant alighted on Saxmundham: it is apparent that the Applicant’s decision to do so was driven by assumptions concerning a common node that have since vanished.

PART 2 SEAS' identification of a credible alternative at the former RAF Leiston site.

- 23 NGET seek to attack SEAS' argument in two parts – the Option Appraisal process and the 8 points they have identified in the SEAS argument for Site 4.

B4.1-B.4.3 The option appraisal process.

- 24 NGET have simply failed to meet any of the points made by SEAS as to the requirements of s104 of the Planning Act 2004 and of EN-1, EN-3 and EN-5, confining their response to a simplistic remark at B.4.2 to the effect that constraints applying to *all* the offshore and onshore elements of the proposed project need to be taken into account. They refer SEAS and the ExA to their CPRSS document APP-368, which describes this process, and which was of course one of the documents which we were criticising. **There is therefore essentially *no argument made at all* against the SEAS' critique** – even though the critique is set out straightforwardly in for example our RR Exec Summary (RR-5210):
- 25 ***P6 para q***: NGET's consideration of options was driven by the assumption that there would be a common Sizewell area node for a 'Sea Link' *and* Nautilus *and* Lion Link, and this can be seen in APP-044, Main Alternatives considered, at 3.6.61-3.6.66;
- 26 ***P7 paras (r),(u)***: In APP-044, especially at 3.6.63, NGET's justification for selecting an entirely new site was that all options should be subject to 'backcheck and review' in the new consideration of whether any could 'accommodate up to three co-located converter stations'; to make this still clearer, the review would consider whether there were additional sites to be investigated of appraised against these criteria. What the Applicant did *not* do was consider and assess the various alternatives that had been communicated and promoted to them by SEAS – these ranged from Bradwell on Sea as a 'package' alternative, to potential local converter sites such as the former RAF Leiston.
- 27 ***P7 para 1.3***, where we assert that the fictional 'Sizewell' needs case, in the absence of Nautilus coming to this area, seems to be becoming something else – namely a more nebulous case for general reinforcement of East Anglian transmission.

B.5.1 Brownfield Sites.

28 Here we see yet more sophistry from the Applicant.

It seeks to erase a key distinction between Site 4 (RAF Leiston) and Site 3 (Saxmundham), that Leiston is a former airfield so has been previously developed, whereas Site 3 has not, by point to the NPPF definition of “previously developed land” (PDL). But that wilfully misses the point: Site 4 has previously been developed, Site 3 has not. Whether or not they might or might not be equivalent in terms of e.g. the application of national Green Belt policy (one of the key policy areas where PDL becomes important) cannot and must not obscure the reality of a previously developed site against a never developed site.

29 To further substantiate this previous development, we are also aware from the East Suffolk Council Local Impact Report REP1-128 that Essex and Suffolk Water, which is in process of consulting before a DCO application for extensive reservoir and pipeline work in the Saxmundham / SZC areas, has reviewed the RAF Leiston site but removed it from consideration on ‘contaminated land’ grounds.

B.5.5 – B.5.8 Access.

30 **B5.5-B5.7** These three paragraphs aim to show that the CPRSS (APP-368) correctly prioritised the five available options for Site 3 over the B1122/Sizewell Link Road access for site 4. NGET admit that access is constrained on both sites; but they then base their actual argument on just two points:

31 - *Access to Site 4 is ‘via a network of minor roads’.* It is presently, but this has not prevented SPR, SZC and a host of other developers from targeting networks of minor roads in Suffolk Coastal for NSIP projects. Friston, too, is accessed through ‘a network of minor roads’. NGET accept in this section that both Site 3 and site 4 will require an element of ‘off-highway’ access, but ignore the fact that the Site 3 access will *also* require one entirely new bridge for this access, as well as the rebuilding of another bridge at Benhall. Site 4 will require neither.

32 - *The Sizewell Link Road will not be completed by the time the Proposed Project will need it to be available.* This is most unlikely – consent for Sea Link is anticipated in the Draft Works Programme in November 2026 (AS-127, Document 7.5.3), and the Link Road is planned to be open in June 2027 (as noted in this para). This means that by the time heavy construction traffic is required for the converter station, a purpose-built highway connection will be available. The Applicant’s portrayal of a long-term constraint is misleading, and not supported by this section of the Appendix – the Link Road’s availability dovetails well into the project’s construction programme.

- 33 It is clear from both points that there are considerable access *advantages* for Site 4, and NGET's false claim of advantage for Site 3 cannot be substantiated – indeed, were the Fromus Bridge to be built, it would only become available after four to six months of construction traffic through Saxmundham streets, probably until Spring 2027. This is not '*avoiding disruption*', but is in fact a failure to meet the requirement to minimise adverse impacts on host communities set out in NPS EN-1 (4.15-4.17). The claim in B.5.7 that '*once the new access to the converter station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121*' is also fanciful, given that at this stage even the design and construction plans for the Benhall Bridge are not yet complete, as CR1-003, 4.5.4, for example, makes clear. No option has yet been selected, and therefore claims based on the final design must be premature.
- 34 Finally, in terms of strategic integration and coordination, an overarching priority, we note once more that the Sizewell Link Road is a purpose-built haul road for the Sizewell C site. Its availability ensures that Site 4 benefits from a sustainable, long-term access solution without the need for disproportionate new works such as the Fromus Bridge and the Benhall Bridge. This approach aligns with **NPS EN-3**, which requires developers of energy NSIPs to coordinate infrastructure wherever possible to reduce cumulative impacts. Site 4 achieves this by integrating with the Sizewell C Link Road and the wider Leiston energy cluster, whereas Site 3 imposes isolated, duplicative infrastructure burdens.

B.5.8 Landscape

- 35 NGET again refer us to their three near-identical paragraphs in earlier documents, without advancing any rebuttal of SEAS' position.
- We consider that NGET at least implicitly, if not explicitly, confirm in their document that Site 4 has excellent opportunities for mitigation of any landscape impact, and would be a good choice for the converter station in this respect.

B.5.9-5.11 Heritage

- 36 As we will show in the next section, the distances quoted in APP-368 CPRSS, figure 9.20, are subject to challenge, and will depend on the point within or on

the boundary of the site chosen as origin¹. Even so, a cursory inspection reveals that using the centre of each site, and taking the distance to the Scheduled Monument Leiston Abbey as the radius of the circle of immediate impact, there are many more heritage assets affected by the choice of Site 3 (33) than Site 4 (21) – although of course the Abbey is the only Scheduled Monument within the Study Area. Figure 1 below sets this out.

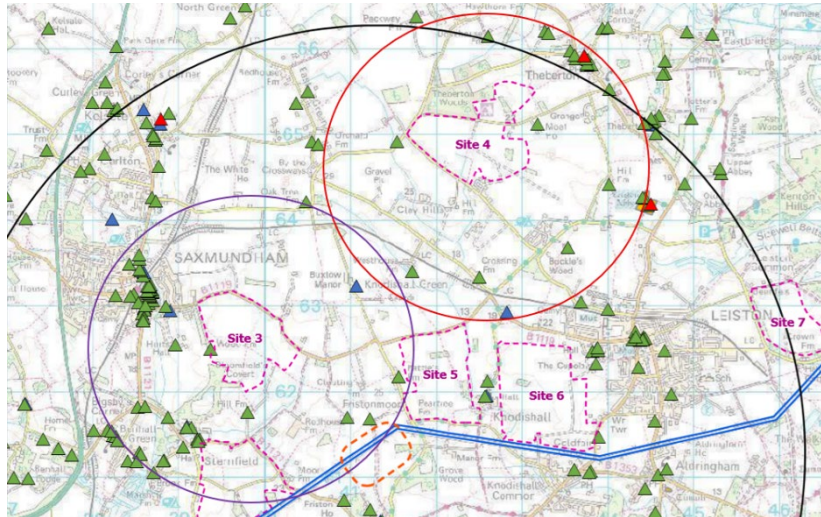


Figure 1 Designated Heritage Assets

- 37 In B.5.10, NGET present a brief and clearly selective summary on NDHAs within the proposed Site 4, but do not quote any similar listing from APP-368 CPRSS for Site 3, since , of course, there has been no similar review in that document for the favoured site. The claim in B.5.11 may therefore be ignored, since it compares an *undefined number* of selected assets at one site with *no data at all* for the other.

B.5.12-14 Community

- 38 As noted above under B.5.5-B5.7, the Applicant admits that Saxmundham will experience daily construction traffic during the Fromus Bridge works, including HGV movements. This is a significant intrusion into a market town and contradicts their claim that Site 3 has “no significant effects on communities.” By contrast, Site 4’s interim routing impacts are limited to a short period before the Link Road opens in June 2027. Once available, the Link Road provides a direct, sustainable access route, avoiding Saxmundham entirely.

¹ Using the 1:40,000 scale at A3 on figure 9-20 in the cited document, it would appear that this is the distance from the *closest* part of the site boundary, as we would unhappily expect. The same methodology used on Site 3 would give the three nearest Designated Assets at 0m,0m, and 40m respectively. This is obviously not a useful comparison, and cannot be claimed in favour of one site over another.

This is consistent with **NPS EN-5 (para. 2.13.17)**, which requires transmission infrastructure to be sited and accessed in ways that minimise disruption to local communities.

- 39 Furthermore, the comments in B.5.12 on site location are once more inept and inaccurate, and do not in any way meet our objections to NGET's preference for Site 3. Site 4 is not '...located approximately 500m from the settlement of Theberton..' – the centre of the site is about 1.45km from the nearest point of the Theberton settlement (see figure 2 in the Appendix to this submission); Site 4 is not '...[located] 1.5km from the settlement of Leiston...' – the distance is about 1.97km (see Figure 3 in the Appendix to this submission). No comparable figures are given for Site 3, but in Figure 3 we have shown that on a similar basis, the nearest settlements (in Church Hill and Wood Farm) are about 500m and 575m respectively. On this (the Applicant's *chosen* basis in this section), it is nonsensical to claim that '*...For Site 3, no significant effects on communities are identified..*'; and therefore if there is anything 'unclear' about site selection in this regard, it is the basis for Applicant's claim for Site 3.

B.5.15 Tourism

- 40 B.5.15 seeks to balance the potential impact of Site 4 on one caravan/camping site against the foreseeably greater damage on a vastly wider scale that Site 3 will bring by forcing traffic through the market town of Saxmundham, the closure of road and rail services for the re-building or reinforcing of Benhall Bridge and the damage to the countryside that will be caused by the building of the Fromus Bridge. This tactic is fairly desperate in any event, but the Applicant's case is wholly undermined by the reality: the tourism element of this 'Holiday Park' has been extinguished in favour of using the site for long term accommodation for the Sizewell C workforce.

We deeply regret the loss of tourism that the current barrage of NSIP development will bring to the Heritage Coast, and here is a serious example of the great harm it is doing in the long term to local business and the environment that brings tourists here. We do not feel that this sorry attempt at point-scoring is worthy of the debate we are engaged in.

2.10.5 Cable Routes

- 41 This paragraph (whose reference indicates it is from a different document) sets out the differences in distance between the Proposed Project, Site 3, and the alternative Site 4. The cable run figures are straightforward – HVDC Site 3: 10k vs Site 4 10.2k, HVAC Site 3 1.9 vs Site 4 3.6km. The overall distances

are Site 3 11.9km vs Site 4 13.8km. a difference of 1.9km. This difference, and the consequently larger temporary land take for the HVAC cable route are given as a binding argument for Site 3, together with the fact that the cable corridors would need to cross the Leiston branch rail line.

- 42 First of all we can discount the strange and irrelevant references to the Lion Link cable run, as we have shown elsewhere that there is no need whatsoever for the proposed Lion Link to landfall in Suffolk, save for the circular argument that bringing unnecessary power into the ‘Sizewell Group’ area via Lion Link will somehow justify the reinforcement *that it will in itself* make necessary. Lion Link’s erroneous claim to ‘co-ordination through co-location’ is not a matter for this Examination.
- 43 We can also discount the issue of the larger temporary land take, in the light of the assurances given throughout the consultation process about the nugatory and transient effect of cable trenching. This and the question of a Site 4 cable run crossing the Leiston railway line are both primarily **cost considerations**, and in this respect there is no question that the overall cost burdens will favour Site 4. The Applicant has failed here and elsewhere to acknowledge the disproportionate cost burden associated with Site 3.
- 44 Constructing a new bridge over the River Fromus, together with a bespoke access road and the necessary flood, landscape, and ecological mitigation, represents a major civil engineering expense. In addition, the Benhall railway bridge will require strengthening to accommodate the anticipated construction traffic, adding further significant cost and disruption to the local transport network. These cumulative costs are wholly additional to the project and arise solely from the choice of Site 3. By contrast, we have shown how Site 4 benefits from the imminent availability of the Sizewell Link Road — a purpose-built, publicly funded highway designed to accommodate heavy construction traffic for major energy projects. Leveraging this existing infrastructure avoids duplicative expenditure and aligns with NPS EN-3, which requires developers of energy NSIPs to coordinate infrastructure wherever possible to reduce cumulative impacts and costs. The economic rationale for Site 3 collapses once the full costs of its bespoke access solution, including the strengthening of the Benhall railway bridge, are considered. Site 4 offers a cost-effective, coordinated, and policy-compliant alternative.

B.6 Summary

- 45 The Applicant’s declarations in this section merely amount to a re-statement of their position that they are not prepared to discuss or rebut the arguments SEAS have put forward in their Relevant Representation. ‘*Many of the points made are incorrect....or of no apparent consequence...*’, with scarcely two examples identified, is a wholly unsatisfactory response to the detailed work that SEAS has put forward to the Examining Authority, and demeans the process.

- 46 The Applicant's claim in B.6.3 that on their view, they have taken all the relevant factors into account is contradicted quite directly by the admission in the *immediately preceding* paragraph B.6.2 that, since Site 4 was not selected as preferred site, it has therefore not been subject to an Environmental Impact Assessment process; we can therefore reasonably reject the unfounded 'indications' that development of Site 4 would potentially have 'significant' environmental or social effects.
- 47 Our claim remains that access considerations do not undermine the case for Site 4. Sea Link consent is expected in November 2026; the Sizewell Link Road is due to open in June 2027, and therefore Site 4 will be fully accessible at the point when heavy construction traffic is required. Site 3, by contrast, would impose equal or greater delays through the construction of the Fromus Bridge, and the design and implementation of an apparently unexpected need for reinforcement of Benhall Bridge, while subjecting Saxmundham to months of disruption.

Therefore, access considerations on the contrary strengthen the case for Site 4 as the more practical, policy-compliant, and community-sensitive location for the Sea Link converter station, fully consistent with NPS EN-1, EN-3, and EN-5 (2024).

Part 3 Response to comments made in Table 2.50 (formerly 2.10.20)

- 48 The Applicant's response in Table 2.50 to SEAS' case on alternative options rests in the main on three statements:
- *Their full response is given in Appendix 2 (or occasionally Appendix 3).* We take both of these to mean Appendix B, and our responses to that document have been given above;
 - *Information on the reasoning behind the connection location for the Proposed Project is contained in [six Application Documents, referenced].* No further link to the actual detailed information relied on is provided, and we cannot therefore seriously take this as a response worth consideration.
 - *Their response to matters regarding the need case for Sea Link and its location in the vicinity of Sizewell are addressed elsewhere in the document.* We have responded separately on the Needs Case.

The remaining comments, where they are not references to Appendix B, are dealt with below in turn.

Brownfield sites (p8)

- 49 *Paras 1-4:* The Applicant rules out Bradwell, Tendring and the Isle of Grain once more, on the mistaken basis that the 'Needs Case' has not changed, and remains unaltered. Whereas it has changed out of all recognition with (a) the removal of Nautilus (b) the reality that even if LionLink comes to Sizewell (which it ought not) the 352MW worst case fault scenario that might arise by the late 2030s could be met cheaply and environmentally by upgrading existing infrastructure. The Applicant continues, despite everything, to proceed on the basis that a sub-sea connection 'in the Sizewell area' is the reinforcement that is needed. This is evidently not a proven case, and so we must repeat our claim that the Applicant has failed to consider potential brownfield options that meet any true needs case.

Similarly, failure to consider the potential to connect into the existing B substation or proposed Sizewell C substation is written off '*on the basis of a range of significant technical risks and challenges*'. However, inspection of 9.3.13 in the CPRSS (App-368, although incorrectly referenced here as APP-367) reveals purely technical issues, and no greater challenges than will be faced by the selection of Site 3.

- 50 *Para 5* The Applicant seeks to rule out the former RAF Leiston airfield site. We have dealt with this in our comments on Appendix B, above.

Consultation (pp8/9)

- 51 SEAS have taken part in and engaged fully with all rounds of consultation, but do not recognise the claim that 'Feedback received throughout the development stages have (*sic*) had a profound influence on the iterative design evolution of the Proposed Project'. On the contrary, we agree with Suffolk County Council's Cabinet Member for NSIPs, who has submitted (in a SCC Cabinet Meeting on 13th May 2025) that: '*Overall, engagement on this project has been both difficult and disappointing, as a result many issues are not properly addressed or resolved, that I believe could have been, if the applicant had taken a more constructive approach.*'. This criticism was made in our relevant representation RR5-210, Executive Summary (ix) – '*SEAS considers NGET failed to consult at a truly formative stage, with an open mind, and that NGET has kept a closed mind since, despite the facts changing beneath the feet of the Proposed Project, removing any justification it might once have had.*' We do not consider that this contention has been disproved.

‘Overarching Need’ (p10 para 5 – p11)

- 52 Whilst we have dealt with the needs case arguments elsewhere, we note that in this paragraph ostensibly rebutting SEAS’ views on reinforcement location, there is a startling new claim that the Proposed Project is in fact meeting ‘..the overarching need to transform the electricity transmission network in the UK...’; in which case the argument for Sea Link and its location at Site 3 falls completely away. We assume this is a drafting error.

Bradwell (p11 para 2)

- 53 The claim here that the Bradwell Power station site was assessed and considered to be too small is referenced to APP-369, OSDER; but there is no such reference or assessment in that document. As such, this cannot be considered a relevant objection to SEAS’ case. On the contrary, in our ‘Case for Bradwell on Sea’ (2024) SEAS set out a simple aerial photographic survey showing that 57 ha of Bradwell A decommissioned land is presently available (in the absence of any plans for ‘Bradwell B’), and a further 50 ha could be available at the disused airfield. The survey is illustrated in Fig 4, in the Appendix to this document. The land available would be sufficient for both the proposed converter site and the substation consented at Friston.

Requirement to be located in this area (p11 para 7, p12 para 1&2)

- 54 These paragraphs seem to claim that assessment of local alternative sites has revealed that none are large enough to accommodate the proposed project. This is nowhere proved; the reference to APP-369 CPRSS reveals only the claim in 5.2.22 of that document:

‘Due to land use of the Project study area defined by the connection points, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements..’

The remaining paragraphs merely repeat the claim that Bradwell on Sea would not for geographical reasons meet the needs case for Sea Link, and this we have dealt with elsewhere.

APPENDIX – FIGURES REFERENCED IN THE SUBMISSION

Figure 2 Aerial photo from Google Earth showing Ex RAF Leiston Site (Site C as identified in Application Document 8.1 Corridor and Preliminary Routeing and Siting study - October 2022 (APP-368)) distances to homes in Leiston and Theberton

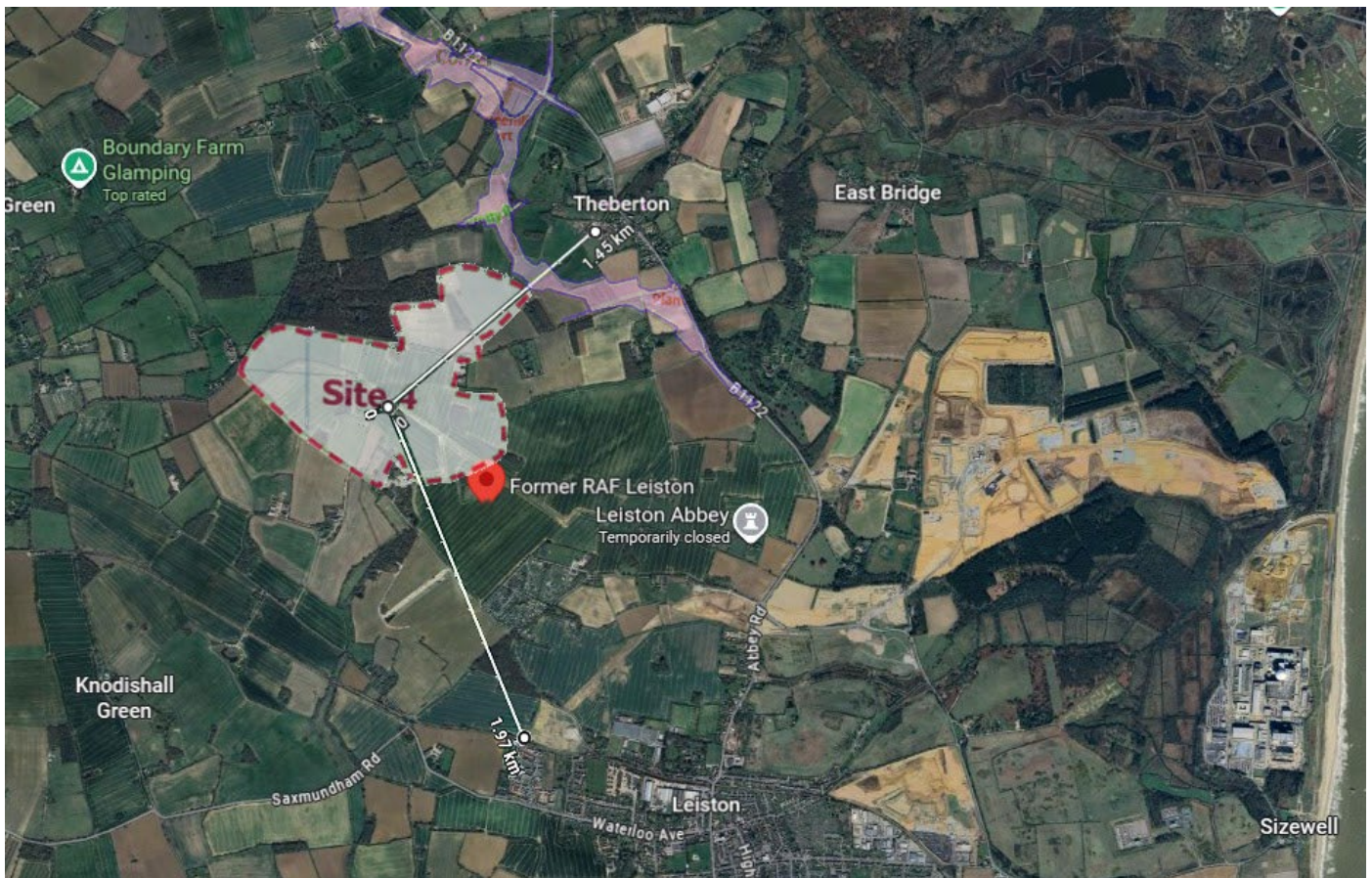


Figure 3 Aerial photo from Google Earth showing the siting of the proposed NGET's Sea Link & Lionlink converter stations and their distance to the homes in Saxmundham



Figure 4 Bradwell Site area with approximate land availability

