



## SUFFOLK ENERGY ACTION SOLUTIONS'

### SEAS REBUTTAL of APPLICANT'S RESPONSE TO SEAS WR ALTERNATIVE SITES

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 3 – 9 January, 2026

Date: 19 Jan 2026

**RE: SEAS' comments in Document 9.79: Applicant's Comments on Written Representations [REP2-034], Table 2.43, pages 379-390. Suffolk Energy Action Solutions' Written Representation – Alternative Sites [REP1-282] refers.**

#### **Introduction**

SEAS does not propose to make any lengthy response at this stage to this latest iteration in the Examination process. Our case has been made and re-made in:

1 **Our original Relevant Representation [RR-5210]**, where we had for the first time to make the caveat that the Representation was to all intents and purposes unnecessary, since there is no coherent case for the Sea Link Proposed Project under the needs case submitted. Our alternatives were identified and set out in some detail without prejudice to this caveat; and we made sure in that document to confirm that these alternatives had been submitted in consultation to the Applicant;

2 **Our Written Representation [REP1-282]**, in which we were able to confirm that the submitted needs case had now been accepted as incorrect by the Applicant at ISH1, by implication confirming also that there was no need for an alternative to an unnecessary project. The admission that the case for reinforcement had reduced from 1,852MW to 352MW, accompanied by the Applicant's assertion that this still required (unchanged!) the wholesale and destructive impacts inherent in their original proposal, requires in our view at the very least a foundational re-assessment of (a) the technical possibilities for their avoidance, and (b) the cost-effectiveness of the proposed solution.

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Submitted 19<sup>th</sup> January

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We also noted in our WR that the Applicant's difficulties in coming to any settled plan for the access via Benhall Bridge to the proposed site, and we stress again here the advantages of at least one alternatives (land at former RAF Leiston) would have as regards access and traffic issues.

**3 Our rebuttal of NGET's response to our Relevant Representation, in [REP2-113].** Here once again we pointed out that an Application submitted on the basis of a project (Nautilus) that had already abandoned the aim of landfall in Suffolk some time before the Application was completed and submitted, was bound to at least recognise the major changes that consequently needed to be made. We also raised a number of queries about claims for co-location being claimed as 'co-ordination', and stressed that from the start (to be precise, in APP-044, *Main Alternatives Considered*), the Applicant had selected *their* alternatives under the confident apprehension that there would need to be a new *common node* for a 'Sizewell Group' of connections – and had made no changes to their plans when the main driver of the 'common node' structure, Nautilus, looked elsewhere for connection.

In Parts 1 and 2 of REP2-113, we set out in detail our rebuttals of NGET's claims against our RR, through a detailed examination of their 'Appendix B', and here we merely draw the ExA's attention to that examination, which the Applicant responds to in the document under review. Given the repetitive and static nature of their response to our submissions so far, we might however particularly draw the ExA's attention to para 51 on p13 of REP2-113, on Consultation, where 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...*'.

#### **Document under review – 9.79 [REP2-034]**

The bulk of the document, as we expected, simply refers us and the ExA back to earlier documents, either the Application documents or their earlier comments. There is little for us to criticise that we have not already shown to be questionable or mistaken, and the bulk of the rebuttals are based once more on the Needs Case that no longer applies. But we must make a few points for clarity:

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- (i) In NGET's response point 1.4, we find '*..Had the Nautilus connection offer been terminated earlier...[...]..or the application submitted later, then the Nautilus interconnector would not have appeared in [the Application], but (assuming that the other variables remained consistent) the conclusions would remain the same.*' This is a Needs Case matter, but it is entirely unreasonable for NGET to claim that no other alternative of any sort would not have met these drastically changed circumstances, nor can NGET claim that they were correct in simply waving away the change and proceeding on the same 'avoidance and mitigation' strategy that had in their view balanced the original, much greater 'need'.
- (ii) At point 1.6, we have '*...notwithstanding the need to reinforce out of the Sizewell Generation Group, the wider regional need to reinforce out of East Anglia is similarly very strong. It is in no way nebulous...*' Nebulous or not (and we certainly stand by that epithet), it is *not part of the needs case for the Proposed Project*, and we strongly suspect that from now on the original needs case, and the relevant alternatives, will be replaced in NGET's arguments by this increasingly regional, but irrelevant (to this case) argument. The first repetition occurs almost at once, at later point 2.5.
- (iii) From point 1.14 onwards, NGET at least respond at some length to SEAS' comments on the new issues raised by the Change Request at Benhall Bridge. The situation is however left at point 1.14 (3<sup>rd</sup> para of response) '*..the methodology will consider the weight restriction at that time..*', i.e. in accordance, apparently, with best practice, there will be no solution even sought to a potentially very challenging access issue until the detailed design and construction phase<sup>1</sup>. At which point, of course, matters of mitigation, and avoidance, and the balance of impacts and needs, would be resolved in the interests of completing the project, regardless of earlier failures to assess the correct site and the least damaging access structures. This is confirmed by the response at point 1.15 – '*...The bridge was understood to be a weight restricted asset while the plans for the Proposed Project were developed, and this was not and is not considered to be an impediment...*'. At least, not to the Project.

## CONCLUSION

Since ISH1, and the Applicant's confirmation that they have no intention of evolving their plans to meet the destruction of their Needs Case through Nautilus' defection to Essex, SEAS have become increasingly concerned that the back and forth exchange of

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<sup>1</sup> Although there must be some planning already in place, since at point 3.8, NGET state '*No closure of the A12 would be required for the works to the Benhall Bridge*'

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documents under Examination has been perceived as by the Applicant as being merely an opportunity to repeat their original case, rather than to appreciate feedback and criticism; and rather than seeing this feedback as a means to a better outcome than they can produce without the assistance of those most directly affected by the Project. We hope that in the course of ISH2 and the remainder of the Examination that this may change.

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