

**SUFFOLK ENERGY ACTION SOLUTIONS'
REBUTTAL TO NGET'S RESPONSE TO**

ExQ1 1GEN49 – NEW ‘NEEDS’ EVIDENCE

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE 3: 9 January 2026

Date: 19 January 2026

On further reading of the Examiners Questions 1 (ExQ1), this document constitutes SEAS rebuttal to the Applicant’s Response to question 1GEN49 as set out in: [\[REP3-069\]](#) - 9.73 Applicant’s Response to ExA – pages 22 to 24

Introduction

Re: SEAS Rebuttal to 1GEN49 and comment regarding absence of “need” and “criticality” for Sea Link

1. In the context of working hours, the Applicant seeks to obtain consent for 12 hours/7days per week including all public holidays, and in support of this and a claimed cost of £3.5m /day due to “constraint payments”, the Applicant yet again refers to the NESO Clean Power Report 2030 and relies on the case that NESO has identified Sea Link as “critical”.
2. SEAS must point out, once more, that NESO’s assumptions regarding Sea Link being “critical” are out of date, and have fallen away. Just as the Applicant’s “need” case as a whole is out of date and has fallen away.
3. SEAS is very concerned that the ExA may not yet have appreciated this, and that the ExA has not yet listed “need” for specific consideration at an Issue Specific Hearing.
4. If nothing else, lack of need for Sea Link means it cannot satisfy the basic requirement set out by EN1 of an ‘economic and efficient’ approach (EN1 3.3.78) and cannot be squared with the balance EN1 requires ‘The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts’ (EN1 3.3.66).
5. Note also that the Energy National Policy Statements in so far as they touch on matters specific to East Anglia are similarly out of date.
6. It is unconscionable that taxpayer and bill payer money should be spent, in the £billions, on something that is not needed.

Why the Application is wrong to rely on NESO Clean Power 2030 identification of Sea Link as “critical” (as assumptions relied on there out of date and have fallen away)

7. In response to 1GEN49, the Applicant makes specific reference to three projects (two elements of Norwich to Tilbury & SeaLink) noting these are deemed by NESO to be “critical”. For this, the Applicant relies on the NESO Clean Power 2030 report (“NESO CP 2030”).

8. NESO CP 2030 states, at main report p.34:

Three projects¹² have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.

9. The footnote is: *These projects are Norwich to Tilbury (these projects have two codes in our network planning processes AENC and ATNC), Sea-Link (SCD1).*

10. Why NESO CP 2030 says this of “Sea-Link” is not explained in the main report, but is set out in Annex 2 to the main report, Networks, Connections, and Network Access Analysis: at Table 1, page 8 <https://www.neso.energy/document/346796/download>. Table 1 is “Impact of key projects for delivery in 2031 if not accelerated” and for “Sealink HVDC from Suffolk to Kent (SCD1)” the “Connections/Support” are stated as:

Facilitates transfer of clean power through and out of East Anglia

Required for connection of Five Estuaries OWF and firm connection of Rampion Extension

11. Below Table 1 is stated:

There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.

12. It may be that at some time, in the past, the NESO suggestion that Sea Link is “Required for connection of Five Estuaries OWF and firm Connection of Rampion Extension” might have been considered plausible, but at the time of this DCO examination it is simply not the case.

13. This (along with the removal of Nautilus) is yet another example of how the Applicant has used out-of-date assumptions to support a baseless “need”

case, here the Applicant's reliance on Sea Link being deemed by NESO to be "critical".

14. Contrary to what NESO CP 2030 says about Sea Link, Five Estuaries Windfarm has been approved to connect to the East Anglian connection node near to Lawford in Essex, as confirmed in a Secretary of State for Energy Security and Net Zero decision letter of 17 December 2025. Most recently, NESO's Transmission Entry Capacity (TEC) register of 16th January 2026 shows Five Estuaries connecting at Five Estuaries 220/66 kV Offshore Substation. Five Estuaries website says it will come onshore at Sandy Point near Holland-on-Sea in Essex, with 22km of underground cables being taken to a new substation (west of Little Bromley) and finally connecting to the grid at the proposed East Anglia Connection Node substation.
(<https://fiveestuaries.co.uk/>)

15. Similarly, Rampion is a windfarm off the South coast of Sussex which the TEC register states will be connected by "1/8/2026 to Bolney 400kv Substation".

16. So, again, not Sea Link.

17. Sea Link does not form any part of satisfying the ability to export Five Estuaries output to south of Network Boundary EC5 (APP-320 page 5), as Five Estuaries will be connected south of that boundary, and Rampion is clearly irrelevant.

18. Hence, neither of the connections NESO CP 2030 claim require Sea Link will in fact require Sea Link. Neither of these connections will connect to Friston substation or be any part of the Sizewell Generation Group that the Applicant has repeatedly (and incorrectly) claimed requires reinforcement of up to 2000MW by means of Sea Link.

The collapse of the NESO CP 2030 claim of "critical" for Sea Link, sits on top of the collapse of the Applicant's "need" case for Sea Link generally

19. SEAS has, through previous written evidence, demonstrated why the Applicant's "need" case has collapsed: a purported "need" for Sea Link to support export from the Sizewell Generation Group of almost 2000MW, is on a very "worst case basis" (approaching 2040), a *possible* deficit of only 352MW (even including LionLink, which is not consented).
20. SEAS has previously shown how this small potential deficit can be resolved by reconductoring the Sizewell to Bramford double circuit OHL at a cost of only GBP tens of million, not the GBP multi billions of SeaLink. (NB the SCC commissioned Hiorn report). Moreover, this reconductoring needs to be done **anyway** by NGET in the next few years, as part of their routine lifecycle maintenance of the Sizewell to Bramford line, which was last reconducted in the early 1990s.
21. SEAS now adds further evidence to support the ease and minimal incremental cost of doing this, namely NGETs recent 82 km reconductoring of the 400kv double circuit OHL from Bramley to Melksham at a cost of £90m.
(Refer <https://www.nationalgrid.com/media-centre/national-grid-fast-tracks-overhead-line-upgrade-project-help-accelerateconnection-dates-175-clean>)

22. Neither the present Energy National Policy Statements, nor the future NPS 2025, provide that the ExA should ignore the fact that the actual need case advanced for a proposed NSIP has fallen away, with nothing to take its place. The taxpayer and billpayer does not have limitless resources, and money must be spent wisely: not simply because NGET says a certain piece of infrastructure merits consent under a DCO.

Conclusion

23. SEAS notes that “need” is not an agenda item for the forthcoming ISH at the end of January 2026, nor has it been, nor is it scheduled for any other ISH.
24. The ExA is requested to include a review of the Need case, as a priority topic in an ISH, at which the need for Sea Link (as opposed to the need for increased network infrastructure as a general concept) can be considered. If it could be included in the ISH in late January 2026, so much the better, but if not at another ISH to be fixed.
25. SEAS believes it is an issue of national importance that a project that will otherwise take (and sadly waste) c.£2.5bn of taxpayer/billpayer money on an issue that can be readily resolved at a cost of less than £60m, is properly examined as to its actual (lack of) need and (lack of) value for money.

End