

**Deadline 5 submission**  
**The real cost of the SeaLink project.**  
**How can it be “Economic & Efficient”?**

**SEA LINK: EN020026**  
**DEADLINE: 5 – 10 March 2026**

**SEAS IP: [REDACTED]**  
**Date: 10 March 2026**

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**1. Introduction**

2. SEAS has previously presented the case to the ExA, that there is no need for Sea Link.
3. As part of this, SEAS has explained why Sea Link cannot meet the “efficient and economic” test set by EN-1. Necessarily, an important element of that, is the much higher cost of Sea Link compared to SEAS’ solution, particularly as Sea Link (the DCO Proposals as submitted) fails to meet the need to cover the suggested worst case network fault deficit in Kent, whereas the SEAS/Save Minster Marshes solution does.
4. To this point, SEAS has worked merely on the basis of the as-at-2018 stated cost of Sea Link, which was said by the Applicant to be about c. £1.1bn in 2018 terms, which if so, would translate into in excess of £2bn at “today’s” (2025) costs, for all the reasons set-out in the footnote below.
5. However, SEAS believes that since the Sea Link project was initiated in c. 2018 there has been considerable “project creep” that may not have been fully reflected in the cost base submitted as part of the Application to this DCO.
6. The purpose of this short submission is limited to exploring the question of whether, in fact, the £1.1bn at-2018 costs estimate given by the Applicant/SEAS’ previous extrapolation of that to costs in today’s (2025) terms as in excess of £2bn, might in fact be a material underestimate.
7. It is in any event the case that even at £1.1bn, Sea Link cannot conceivably be considered to meet the “efficient and economic” test, given the cost of the alternative solution is a fraction of that. But the ExA may be assisted by consideration of whether even £1.1bn-2018/over £2bn-2025 underestimates the position.
8. Specifically, SEAS draws the ExA’s attention to the question of whether each of the

following project items has been fully costed and those costs have fully incorporated into the 2018 cost base. We would hope that the Applicant would be providing this information in any event, in response to the ExA's questions on need, the answers to which are due at Deadline 5. However, we set these points out now, as we would not want them to be missed. If the Applicant is not providing the information already (which it should be), then to respond should be a relatively easy and quick process for the Applicant.

9. The items SEAS has identified are these (there may be more, the Applicant will know if so):
  - a. The compulsory acquisition and re-development of the Ramsgate Hoverport.
  - b. The requirement to raise the level of the proposed HVDC converter station and substation site at Minster Marshes by 2m, including massive aggregate infill and significant piling works, as the proposed site is in a flood plain.
  - c. The structural remediation/ improvement (or an alternative solution) to permit the structurally safe use of the Benhall Railway bridge, to permit AILs to access the proposed Saxmundham HVDC site.
  - d. The requirement to build a new 4m to 5 m high bridge over the River Fromus (& flood plain) to carry all the construction traffic (including multiple AILs) to the proposed Saxmundham converter station site.
  - e. The requirement to do about 1km of HDD drilling from an offshore platform near to Aldeburgh, underneath the RSPB North Warren reserve, which was not required when landfall would have been made at Sizewell.
  - f. The incremental cost of c 8 kms of additional cut & cover trenching for HVDC cables being taken farther inland (to Saxmundham) versus the original planned Sizewell.
10. For each of these items, and any others SEAS has missed, the question that presents is whether it has been fully costed and properly included in the stated £1.1bn project (in 2018 money). To take the matter one step on, the further question could be asked: what would it cost in 2025 money.
11. SEAS' own view, having researched the likely cost implications of these items that SEAS understands to be project changes since the £1.1bn costing was arrived at, is that the true cost of Sea Link is likely to be more than £3bn in 2025 terms.

12. Whereas the SEAS/Save Minster Marshes solution fully resolves the stated network and boundary deficits in both Suffolk and Kent at a cost of less than £200m in 2025 terms (and note, this cost would probably be barely £100m, if allowance were made for the normal lifecycle replacement of the conductors on the Sizewell to Bramford double OHL).

13. SEAS provides this further information and analysis in order to assist (both the ExA and the Secretary of State). SEAS is convinced that the Secretary of State would not wish to contemplate the additional spend involved even if the difference were between a SEAS' solution cost of <£200m and a Sea Link as-at-2018 cost of £1.1bn. In fact, it is likely the true difference is much greater.

14. If the Applicant does address cost in its Deadline 5 response to the ExA's questions concerning need, then SEAS will consider and provide further material if necessary.

#### Footnote:

Information that supports SEAS's view that the Sea Link project will cost £2bn (or more) today

- The 2025 IET Report by Mott MacDonald (albeit based on 2022/23 data)
- The published cost of Viking Link, a comparable project, albeit only 1.4GW
- The published costs of Eastern Green Links 1 & 2, two other comparable projects.
  - EGL 1 is a 2GW subsea cable link, longer than SeaLink at 190km that will cost £3.4bn and will terminate at Hawthorn Pit in Co. Durham, where there are none of the location specific issues encountered by SeaLink in both Suffolk and Kent.
  - EGL 2 is a 2GW subsea cable link, much longer at 505km, that will cost £4.3bn and will make its grid connection at Drax Power station in Yorkshire, where there are none of the location specific issues encountered by SeaLink in both Suffolk and Kent.
- 19<sup>th</sup> November 2025 decision by OFGEM:  
<https://www.ofgem.gov.uk/sites/default/files/2025-11/Sea-Link-Decision.pdf>  
OFGEM has been forced to "fast-track" funding because "costs are rising so quickly."
- The May 2025 NG investor relation's presentation made by Carl Trowell (President of NG Strategic Infrastructure) highlighted that the "Great Grid Upgrade" portfolio (which includes Sea Link) is facing "unprecedented scale and pace." It shows that the cost of HVDC "valves" and "transformers" has escalated because every country in Europe is trying to buy them at the same time. NG is paying a scarcity premium that did not exist when the £1.1bn estimate was made in 2018.
- Siemens & Hitachi's 2024 Annual Reports which show that there are 40%–60% price rises since 2021 due to global demand for "Energy Transition" projects."

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