

Sea Link's Needs Case is fundamentally flawed. National Grid has not demonstrated that this project is required on the timescale claimed or that it represents the best use of public and consumer funds.

The company's modelling relies on out-of-date assumptions about generation and demand patterns from the early East Anglia studies — studies that pre-date Sizewell C delays, the upgrade review of offshore wind targets and the accelerated roll-out of HVDC technology, and the change of Nautilus' connection site to Grain. National Grid presents Sea Link as an urgent necessity when the evidence shows there is time to design better solutions that deliver significant cost savings, as well as socio-economic and environmental benefits.

Sea Link has been described as the "missing link", but National Grid has never shown what specific generation it will carry or how it fits within a clearly-modelled future network. There is no transparent system analysis of alternative HVDC paths or demand-side reinforcement. The Needs Case rests on assertion, not evidence.

Sea Link's Needs Case is fundamentally flawed. National Grid has not demonstrated that this project is required on the timescale claimed or that it represents the best use of public and consumer funds.

The company's modelling relies on out-of-date assumptions about generation and demand patterns from the early East Anglia studies — studies that pre-date Sizewell C delays, the upgrade review of offshore wind targets and the accelerated roll-out of HVDC technology, and the change of Nautilus' connection site to Grain. National Grid presents Sea Link as an urgent necessity when the evidence shows there is time to design better solutions that deliver significant cost savings, as well as socio-economic and environmental benefits.

Sea Link has been described as the "missing link", but National Grid has never shown what specific generation it will carry or how it fits within a clearly-modelled future network. There is no transparent system analysis of alternative HVDC paths or demand-side reinforcement. The Needs Case rests on assertion, not evidence.

SEAS therefore urges the Examining Authority to find that the project fails the basic test under EN-1 and EN-5: that a proposal must be demonstrably necessary and proportionate to its claimed purpose. Until a credible, transparent strategic assessment is produced, this DCO application can surely not be recommended for consent.

Alternative Sites and Alternative technology

landscape and ecological harm and displacement, and extreme upheaval to nearby communities — including an unsound and disruptive logistics route through Benhall and Saxmundham that National Grid is now trying to fix through late "non-material" changes.

Crucially, offshore innovations — including options for offshore converter platforms and direct HVDC connection to more suitable inland or brownfield substations closer to demand such as Isle of Grain, West Grain, Bradwell, Thames Gateway — were dismissed without ROBUST AND TRANSPARENT comparative analysis.

These options could have avoided almost all onshore impacts. SEAS will be presenting some of these options at the Issue Specific Hearings.

The Alternative Sites assessment therefore fails the policy test under EN-1 and EN-5, which require clear justification where a project imposes greater environmental or community harm than reasonable alternatives. Until a credible, transparent assessment of alternative locations and routes is produced, consent CAN SURELY NOT be granted.