

EN020026-003075 Action Points for ISH3. Point 90.

Further evidence on the need for the project that I consider is not already before the ExA.

Thank you for the opportunity to highlight matters for consideration and examination.

1. Need for the Proposed Project to be located here, because of no other option:

The network in and between East Anglia and the South-East of England specifically needs reinforcing the Applicant says because “the existing network was not designed to transport electricity from where we increasingly now generate it (largely offshore)” and due to the “growth in offshore wind...and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport”. If these statements are true then NG should have invested in a holistic and robust alternative off shore not rely on a series of small (2MW) interconnectors. Their failure to strategically plan for this predictable situation, requires a different more robust solution. Called the ‘Great Grid Upgrade’ is anything but this. Other options have not been presented to the ExA to be costed, evaluated or examined to prove that there are no other options except to reinforce the network via a series of interconnectors, nor to locate Sealink here.

The need for 50GW of offshore wind by 2030 again does not mean that the reinforcement by means of an interconnector is the answer and that can only be located here.

Even if the project is of national importance and significance, and qualifies under NPS EN-1 as being urgently ‘needed’.... The policy is not location specific nor is it design/model specific. There is a difference between a national need for an action, and the need for that action to be located here. The Applicant has not proven the later.

Other locations exist which have not been explored due to the false offer (through the failed COIN process based on the assumption that there was capacity to connect to the Grid). This and National Grid’s overall financial business ambition to create a hub here because it is more challenging to develop where there is other infrastructure on a brown field site - should not be weighted as strong evidence towards the needs case.

2. The claim by the Applicant of ‘unmet need’ for the Sizewell Generation Group:

The predicted output of SZB following its proposed lifetime extension and SZC, along with Greater Gabbard, Galloper wind farms and SPR EA1N and EA2 means that this area is not deficient of power, nor will it be even if the weather conditions are not conducive for wind generation.

There is capacity for any excess volume of generation over demand to be transmitted via the 400KV lines with the upgrade reconducting included in the SZC DCO. There is no need for SeaLink to facilitate SZC, and this was not mentioned or examined in the DCO for SZC.

Reconducting (as required anyway for SZC) if completed with the newest technology (high thermal conductors) will increase load capacity for a much smaller cost than for Sealink. (SCC

Report Sept 2023 reference to The Hoiorns Report para 10.6.2-10.6.3, pgs 32-33 explains). As such Sealink is not economic or efficient in comparison - so does not meet EN1 3.3.78.

Our tourism economy generates £36B in visitor spend per year. With 245M visitors per year visiting National Landscapes and National Parks. This has to be included.

The offer of connection in the 'Leiston area' somewhere on the 400KV line for SPR EA1N and EA2 was a false offer, as it was based on 'spare capacity' being available. And should have been discounted by SPR.

If there is excess wind energy from SPR EA1N and EA2 which needs to be exported to elsewhere in the UK or to Europe, then this power should not come ashore and go to Friston substation, only to go to a new Converter station and leave the shore out to sea via Sealink. It should be transmitted from source of generation via an offshore Converter station, as being built for other projects.

Nautilus has been removed from the calculation for the 'Sizewell Generation Group' with landfall now at Isle of Grain. And Sealink can not be perceived as a reinforcement or risk/fault back up for the main Bramford to Rayleigh line, as it is not part of this network.

### 3. That National Landscapes should be subject to an exceptional need case test:

The National Planning Policy Framework continues to require that 'greater weight' be given to conserving and enhancing scenic beauty, and scenic beauty is evidenced as a protective factor to balance mental health and well-being.

In 2023 the Levelling up and Regeneration Act requires local Planning Authorities to "seek to further" not just have "regard to" the purpose of National Landscapes and National Parks. This enhanced duty could translate to a requirement for Bio- diversity Net Gain or legacy beyond just mitigation for that harmed. "To further" implies the need to protect natural beauty, wildlife and cultural heritage of this area, and must make it harder for damaging development to gain approval, especially where harms cannot be completely avoided, reduced, mitigated or compensated.

ExA authority must consider how the protected landscape area can be "unharmful" overall by the project, which is a very high benchmark.

### 4. Government targets for 2030 should not be used inappropriately to support development of inappropriately located infrastructure:

National Landscapes Association September 2025 states that "the health of our environment underpins the health of our economy and the health of our people". And "skewing this balance (for the sake of 2030 targets) will have devastating consequences."

The national 'Needs case' for an effective transmission network should not be confused with a needs case for location specifically here. There is no doubt that a coordinated, strategic review is needed.

There are also Government targets to “conserve 30% of land for nature by 2030”. The need to prioritise the delivery of renewable energy, although “will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy” (Ex1.2.5) is not to be at the expense of National Landscapes.

It is a dangerous precedent if infrastructure for previously agreed NSIPs (such as the SZC Link Road) is allowed to be used to facilitate further projects, which bring additional harm in areas of National Landscape.

The Applicant (5.2.30) refers to more energy across London and in Kent and the need to exchange more energy with Europe (as a financial model, as well as in theory to increase stability of supply). If you consider a map of Europe and the UK it is more beneficial to connect direct to Kent from Belgium/Netherlands. And direct to Norfolk from Germany. This would also avoid the protected Coraline Cragg off the Suffolk Coast, and reduce risk of crossing existing cables and tunnels connected with SZB and SZC.

The Tarchon project seeks to bring only 1.4GW power to and from Germany to Tendring, Essex. One must consider if it would be better and more effective to have greater volume of power in less connections, rather than a multiple series (each less than or equal to only 2GW each)?

NPS EN-5 references the Horlock Rules providing guidelines for the siting of substations (and one can infer convertor stations) should “seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value” by the overall planning of the system connections. Therefore NGET should be held account to provide a solution to do so.

Policy SCLP10.4 (Landscape Character: of the East Suffolk Local Plan 2020 states that “development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coasts and Heaths” (now called National Landscapes). As such the greatest possible weight must be given to protection, and any need must be 100% proven.

And mitigation or compensation cannot be added as ‘benefit’ to strengthen the argument of ‘need’ by the Applicant. It is to redeem against loss and harm, it is not a benefit. The Applicant has sort to add weight to the need argument, by listing perceived benefits to the UK of the scheme. However, these benefits would be created where ever the project was located or if the project was delivered by a different model such as an offshore mesh and hybrid connectors with offshore convertor stations.

In conclusion there is a great deal of evidence which requires an ISH to examine the case for ‘need’ as presented by the Applicant which underpins this whole application.

