SEAS D6 REBUTTAL OF THE APPLICANT'S REP5-142

('Applicant's Response to 2GEN1 and 2GEN2 in respect of Need')

NEED

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CONTENTS

1. INTRODUCTION

1.1 At Deadline 5, the Applicant submitted **REP5-142**, in response to 2GEN1 and 2GEN2. **REP5-142** includes what is described as "rebuttal" to SEAS' earlier submissions regarding the Applicant's "need" case for the Proposals (stated as specifically in response to **REP3-144, REP4-156, REP4-238**).

1.2 It is apparent that the Applicant continues to attempt to re-invent its "need" case, in the face of the reality that the c.2,000MW transmission "need" claimed in the Application documentation cannot stand scrutiny, and with it the justification for the 2,000MW HVDC primarily offshore link at the heart of the Proposals (and SEAS has made the point before, but the Application documentation confirms that the critical document setting out the Applicant's "need" case for the Proposals is the "Strategic Options Back Check Report" **APP-320** – see the Applicant's original Planning Statement, **APP-319**, at e.g. 5.2.3). The ExA is please asked to note the extent to which the Applicant's "need" case has shifted since **APP-320** (which shifting is briefly sketched below).

1.3 Also included in **REP5-142** are various attempts by the Applicant to set up and then knock down false targets, including apparently deliberate mischaracterisation of SEAS' points, and arguments by which the Applicant seeks to pull itself up by its bootstraps[1] (reliance on early construction funding as supporting "need" being a paradigm example).

1.4 Putting to one side the frustrating reality that the Applicant has made its "need" case a moving target, SEAS engages fully with it, and by this Deadline 6 document SEAS responds to and rebuts **REP5-142**, demonstrating that the Applicant's reworked "need" case stands scrutiny no better than did the Applicant's original "need" case. The lead author is, again, Mr Geoffrey Dunn.

1.5 As ever SEAS advances evidence to inform the examination, rather than relying on assertion, and this submission includes further evidence in response to the Applicant's various claims.

Amongst other things, SEAS includes here consideration of on-point DCO examining authority reporting and Secretary of State DCO decision-making which further confirms the category error in the Applicant's reliance on the 2024 Clean Power 2030 report, and its related further reliance on the 2024 Clean Power Action Plan, to show the Proposals are required as "critical" and "urgent".

Further, in light of latest evidence, we set out a revised NETS-SQSS compliant and economically efficient solution that can be securely delivered sooner than the Proposals, albeit (as we have pointed out) the claimed "worst case" "need" of c.352MW (not the previously asserted c2,000MW the Proposals are obviously designed for) will not eventuate until at least 2035 and possibly much later than that. But the demonstration of a deliverable and efficient alternative that greatly reduces the need for mitigation of environmental impacts is in itself a demonstration that Sea Link is not "required".

1.6 SEAS continues to accept the clear and urgent national need for reinforcement of the electricity transmission network as a matter of generality. But that does not absolve these

[1] It is somewhat ironic to see the Applicant deploying bootstrap arguments in support of a bootstrap project.

Proposals of the need to satisfy policy and to pass the overarching statutory test. The Applicant has not shown, and cannot show, that Sea Link is necessary, proportionate, economical or efficient, rather than a deeply unfortunate waste of bill payers' (and tax payers') money.

1.7 The fact that the Applicant decided on a course years ago, and has refused to change tack in response to changing facts, is no good reason for continuing to pursue these Proposals, and certainly does not meet the national policy tests or amount to a compelling case for compulsory acquisition. As SEAS noted at ISH3, it is striking that whereas the Suffolk local authorities had previously kept their counsel regarding "need", East Suffolk Council has now seen the strength in SEAS' position, and set out its endorsement in writing (in its response to EXQ2 at deadline 5 **[REP5-189]**), whilst Suffolk County Council then added its voice at ISH3.

1.8 We start with brief consideration of the shifting sands of the Applicant's "need" case, noting and quickly disposing of points we have already addressed, before moving on to the detail of points in **REP5-142** on which there is more to be said.

2. SHIFTING NATURE OF THE APPLICANT'S "NEED" CASE AND SHORT RESUME REBUTTAL OF POINTS ALREADY ADDRESSED

2.1 The Applicant from the outset stated that its 2025 Strategic Options Back Check Report [**APP-320**] set out the *full detail* of the need case (see the Applicant's Planning Statement, **APP-319**, at e.g. 5.2.3). As SEAS has previously noted, the "need" presented and purportedly evidenced by **APP-320** as justifying a means to move electricity out of Suffolk was the claimed "Sizewell Generation Group" worst case transmission deficit of c.2,000MW. It was said Sea Link would contribute to meeting other asserted network issues (see list at **APP-320** para. 3.8.1), but the Sizewell Group "need" of c.2m000MW was the foundational need for which detailed analysis was presented and on which the Suffolk need case hung (see para.3.8.2). It is no coincidence that the heart of the Proposals is the 2,000MW HVDC link. It is obvious the Proposals were designed and advanced as the solution to this purported problem.

2.2 It was this asserted c.2,000MW worst case "need" to move electricity out of Suffolk, and the infrastructure said to be required for that, that was then used as the basis for the case that it made sense for the same infrastructure (i.e. the Proposals) to take any excess electricity out of Kent in the event of a worst-case fault there. This despite the obvious lack of any demand for additional electricity in Suffolk (see SEAS' previous submissions).

2.3 To emphasise the centrality of the Sizewell Group claimed c.2,000MW transmission "need" to the "need" case for this Suffolk-landfalling 2,000MV HVDC "Sea Link", and the consequential nature of Sea Link as a contributor to meeting Kent issues, paragraph 3.8.2 of **APP-320**, which sits at electronic page 48 of a 148 page document (so with two-thirds remaining), says this:

> *'The remainder of this report considers the options required to resolve the provision of circa 2000 MW (i.e. greater than 1,800 MW) between Sizewell and the SC2 Boundary, resolving the Sizewell need and providing a significant reduction to the future capacity requirements in SC2.'*

2.4 In these circumstances, one of the more telling paragraphs of **REP5-142** is para. 2.1.3, where the Applicant purports to summarise its "need" case by reference only to para. 3.8.1 of its 2025 Strategic Options Back Check Report [**APP-320**], skipping over para.3.8.2 of **APP-320** and thus attempting to shift attention from the reality that the foundational "need" at the heart of **APP-320** was the claimed Sizewell Group c2,000MW "need".

2.5 The Sizewell Group "need" case having collapsed pre-Application from a claimed worst case need of c.2,000MW to just 352MW with the removal of Nautilus (and even that 352MW not until sometime in the late 2030s, and only because the Applicant's sister company NGV has chosen to site LionLink here), and in circumstances where it is clear that both this putative need, and any Kent need, can be met by more cost effective and less environmentally harmful means, the Applicant has sought to pivot in various ways.

2.6 One such way is the assertion that Sea Link is "critical" by reason of NESO's Clean Power 2030 report of November 2024 ("CP30R") in combination with the 2026 EN-1 (see **REP5-142** para. 2.2.4, section 2.5 etc). SEAS has already addressed this, but the Applicant makes an unmeritorious attempt to knock down SEAS' arguments (which includes a notable attempt to mischaracterise those arguments and so duck the issues). SEAS deals with that below.

The Applicant also seeks to rely on the Government's Clean Power 2030 Action Plan of December 2024 ("CP30AP"), on the basis it endorsed CP30R (see **REP5-142** para. 2.5.4 etc). This is similarly dealt with below.

2.7 Another is the assertion at para. 2.3.4 that the present (applicable) EN-1 provides "specific" support for the Proposals, as follows:

> *'Paragraph 3.3.68 of NPS EN-1 notes that "The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial" and that "National Grid ESO forecasts that over the next decade the onshore and offshore transmission network" will require, inter alia, "substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation". That provides specific policy support for Sea Link.'*

Again, SEAS has already dealt with this, which clearly does not provide "specific policy support for Sea Link". General support for "reinforcement in East Anglia" is not synonymous with support for the "Sea Link Proposals" specifically. The NPS text (para. 3.3.68) reflects a high-level forecast, but as SEAS has demonstrated (**REP4-156**), the "substantial reinforcement" required can be delivered (and is already being in part delivered) via more efficient and less damaging means. The Applicant cannot use this policy paragraph to justify a specific, multi-billion pound 2,000MW HVDC "bootstrap" if a lower-impact alternative can resolve what remains of a putative transmission capability gap. SEAS says no more about this.

2.8 As to para. 2.3.5, this is a misapplication of the policy: while the Secretary of State may not need to quantify an individual project's contribution to national net-zero targets, it is material to consider whether the project is actually necessary to meet the locational need it claims to serve and does not represent a diversion of funds from more efficient and economic projects. As explained in SEAS' Deadline 1 submission (SEAS' written representation) (**REP1-281**), transmission infrastructure is inherently locational. If the "need case" for a specific location (Sizewell) is based on a contracted background that

has fundamentally changed (the removal of Nautilus), then the project's "contribution" is no longer satisfying an actual need, but rather addressing a "construct" or a "manufactured deficit." This is *a fortiori* if the residual "need" could be met more cheaply, in financial and environmental terms.

2.9 Paragraphs 2.3.6-2.3.12 of **APP5-142** contain similar misunderstandings/ misapplications of national policy:

- As to para. 2.3.6, being designated CNP does not grant a project "immunity" from rigorous examination of alternatives or costs, let alone the need to show a "compelling case" for compulsory acquisition. EN-1 paras. 4.2.5 and 4.2.16 emphasise that even CNP projects must minimise impacts and demonstrate that they have been designed to be efficient and economical. Furthermore, CNP status is intended to accelerate the "right" projects. If Sea Link is designed for 2GW of load when only 0.35GW might eventuate in that corridor, it becomes an "inefficient" project. Speeding up an inefficient and environmentally damaging project is not the intent of the CNP policy. See also below in this document regarding Clean Power 2030 and criticality and urgency.

- As to paras. 2.3.7 - 2.3.8, there is a fundamental distinction between energy generation and transmission, which the Applicant studiously ignores. While a megawatt of clean energy is useful anywhere on the grid, transmission infrastructure is, by its very nature, location-specific. As stated in **RR-5210** (e.g. para. i) and **REP1-281** (e.g. para. 15), it is illogical to presume a need for reinforcement in a particular place without evidence of a specific transmission capability gap. National policy does not grant a mandate to build any transmission infrastructure, anywhere; it grants a mandate to solve identified bottlenecks. If the worst-case bottleneck at Sizewell has shrunk from 1,852MW to 352MW, the "locational need" has fundamentally changed, rendering the current Proposals a solution in search of a problem.

- As to paras. 2.3.9-2.3.10, see immediately below.

- As to para.2.3.11, the Applicant's "demonstration" of "locational need" is a construct based on stale data and circular logic, as SEAS has previously shown. It remains inexplicable that the Applicant failed to revisit its "need" case to take account of the removal of Nautilus <u>before</u> it submitted the Application and long before the Application was accepted, and the remaining 352MW worst case "need" cited to justify SQSS compliance is not only something that will not materialise until the mid-2030s at the earliest but also something that relies entirely on the inclusion of LionLink - a project by NGET's sister company (NGV) that could landfall elsewhere. Relying on a sister company's optional siting decision to assert a "license breach" risk that "requires" a £2bn reinforcement is not a demonstration of locational need; it is an attempt to rely on one speculative project to provide a "criticality" shield for something that is the wrong thing in the wrong place.

- As to para. 2.3.12, claimed "urgency" does not absolve a proposal of compliance with the policy tests, and is certainly not a mandate for lack of economy and for inefficiency. While the national transition to clean power is urgent, the NPS does

not seek, let alone require, the construction of mislocated or inefficient infrastructure. Bringing a project forward "at pace" using a faulty c.2GW deficit model risks stranded investment and unnecessary environmental destruction. True urgency demands that the right solutions are deployed quickly, rather than the wrong solutions being forced through despite a 1.5GW reduction in required transmission “need”.

2.10 Related to the above, another way the Applicant has sought to pivot, is the claim that NPS EN-1 paragraph 3.3.78 “efficient and economical” means only that (**REP5-142** para.2.3.10, with para.2.3.9):

> *‘…the network project needs to follow good design, avoidance and mitigation principles (and / or biodiversity compensation where needed for transmission in the marine environment), as referenced in EN-5.’*

- with the Applicant also plainly implying that “good design” is a narrower concept than whether the proposal is needed at all.

Thus, the Applicant misunderstands the plain language “efficient and economical” and makes a markedly weak attempt to undermine SEAS’ evidence that the modest worst-case deficit that might arise by a point in the mid-2030s could be met with minimal cost and minimal environmental impact by comparison with the Proposals. The notion that “efficient and economical” does not even include, let alone turn substantially on, minimisation of cost and environmental impact is so obviously wrong SEAS says no more about it. But the fact the Applicant seeks to advance that argument is highly revealing of the lack of substance in its “need” case.

A multi-billion pound, 2,000MW HVDC link is neither efficient nor economical when applied to a residual 352MW deficit. As evidenced in **REP4-156** and **REP5-206**, lower-impact solutions would resolve this 352MW N-1 fault requirement at a fraction of the cost (c.£170m, IET 2025 p.48). These are basic "Good Design" principles, and to ignore them in favor of an over-scaled project is a direct violation of the very policy the Applicant cites.

2.11 Of a piece with these pivots from the Applicant are its suggestions (e.g. section 2.4, paras.3.1.3-3.1.5 etc) that the Proposals are the only way the Applicant can be in compliance with its electricity licence (which has requirements similar to the “efficient and economical” policy test).

2.12 In addition to the above are the assertions at 2.1.4-2.1.6 of **REP5-142**, by which the Applicant argues that 352MW is “still a sizeable figure” and that (in a run of assertions the ExA will note even now lack evidential support):

> *‘2.1.4…as set out in this document is only one of the multiple requirements set out above that needs to be addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent).*
>
> *2.1.5 It is important to note that each one of these issues on its own would have to be addressed by a specific investment in the network, and that by providing additional capacity and greater resilience in the network, the Proposed Project will help to address each of these issues.*

2.1.6 Further, whilst the additional capacity that Sea Link will provide will help to accommodate individual generation projects and also provide additional capacity to overcome specific network constraints, it is also important to recognise and give weight to the fact that the Proposed Project is a holistic and strategic investment designed to reinforce the national electricity transmission network as a whole.'

See also 3.1.6, and note the interesting language the Applicant slips into, which is not the language of hard-edged "need", e.g. *'Whilst a shortfall of 352MW is significant in its own right, the rationale for the Proposed Project is in any case to provide additional capacity, resilience and transmission capacity and to tackle a number of issues in the network as a whole…'* (our emphasis).

2.13 Of the various pivots from the original "need" case not summarily addressed above, we deal with the Applicant's claims regarding CP30R/CP30AP first, in the section immediately following.

3. WHY APPLICANT IS WRONG TO CLAIM THE 2024 CLEAN POWER 2030 REPORT AND THE 2024 CLEAN POWER 2030 ACTION PLAN EVIDENCE "CRITICAL" AND "URGENT" NEED FOR THE PROPOSALS

3.1 The Applicant continues to advance its new argument (see e.g. **REP4-092**, quoted at **REP5-142** para. 2.2.4) relying on CP30R, that:

'…As a project which was identified in the NESO's Advice on Achieving Clean Power by 2030 (NESO, 2024), the critical and urgent nature of the project is therefore reinforced by the inclusion of the Clean Power Mission in the 2026 NPSs.'

To this, the Applicant adds reliance on CP30AP, on the basis that this endorsed CP30R.

3.2 First, the ExA is asked to note that the Applicant did not rely on CP30R/CP30AP in its 2025 Strategic Options Back Check Report [**APP-320**], which NGET has always emphasised as setting out the *full detail* of the need case. This is despite the Applicant plainly being aware of both, as shown by the (single) passing reference to CP30AP in footnote 3 at para.2.1.4 of **APP-320**.

3.3 Second, the ExA is asked to note that the Applicant has rather cleverly sought to mischaracterise SEAS' arguments in order to set up and knock down a false target, and so avoid having to deal with the evidenced case against it. This is at section 3.5 of **REP5-142**.

However, contrary to the Applicant's attempts to frame matters, the issue is not at all whether or not Five Estuaries or Rampion Extension (Rampion 2) connect physically into Sea Link.

Rather, the issue, which the Applicant attempts to sidestep, is that CP30R Annex 2 expressly states that Sea Link is "**required** for connection of Five Estuaries OWF and firm connection of Rampion Extension".

3.4 Whereas, as SEAS has pointed out, whatever may have been in NESO's mind when it wrote those words, it is plainly incorrect to say that either Five Estuaries offshore wind

farm or the extension to the Rampion offshore windfarm require the Proposals to feed their electricity into the grid. The Applicant tries to characterise SEAS' arguments as being simply (and mistakenly) that CP30R envisaged those proposals would physically connect to the grid via Sea Link, whereas it is apparent from elsewhere in CP30R NESO knew that was not the case. This mischaracterisation of SEAS' case and attempt to paint SEAS as incorrect is an attempt at misdirection and distraction, pure and simple.

The basic point SEAS has made is that CP30R is wrong (and in so far as it carries this forward CP30AP is also wrong) to say that Sea Link is required for Five Estuaries OWF or Rampion Extension to be brought onstream and feed in.

Any suggestion otherwise cannot possibly stand with the Secretary of State's own decision-making subsequent to CP30R/CP30AP.

We are conscious that the ExA will be familiar with this decision-making, and at least some of the ExA intimately so, but it is apparent the Applicant is not, hence we spend time setting out the detail.

It is also very interesting to consider the contributions NGET itself made to those DCO examinations, which it is apparent from the examining authority reporting did not include argument that Sea Link was necessary for those proposals to come forward (or even identification of the asserted boundary deficits the Applicant seeks to rely upon here).

3.5 **We will deal first of all with Five Estuaries offshore wind farm.**

3.5.1 Five Estuaries OWF was subject to an application for a DCO which led to a recommendation report published on 17 June 2025 and a decision letter from the Secretary of State dated 17 December 2025.[2]

3.5.2 The chronology is significant, in that CP30R and CP30AP were published well within the Five Estuaries examination (as the recommendation report explains at the outset, the examination of the application began on 17 September 2024 and was completed on 17 March 2025), and long before the Secretary of State's decision. Moreover, the recommendation report, with which the Secretary of State agreed, includes various references to the Clean Power 2030 "Action Plan" (see 3.3.3, 4.8.42 and Table A4).

3.5.3 It is also significant that NGET was one of a very few parties that entered into a statement of common ground with the applicant (in fact a tripartite SoCG with another party), as recorded at 1.4.6 of the recommendation report.

3.5.4 In those circumstances, it is telling that the Five Estuaries recommendation report mentions Sea Link repeatedly, but only in order to discuss the abandoned feasibility work exploring a physical offshore connection to Sea Link. This is important, and we quote here extensively from the report - see 3.2.7-3.2.11 in particular (within Section 3.2, under the sub-heading "Alternatives") and 3.3.11-3.3.14 in particular (within Section 3.3, again under a sub-heading "Alternatives"), as follows:

> *'3.2.9 The single main alternative option to the development as proposed would be to connect the Five Estuaries wind turbine generator (WTG) array areas to National Grid's proposed Sea Link project, a point-to-point offshore cable link between Suffolk*

[2] Five Estuaries recommendation report and decision letter

and Kent to reinforce the nation's onshore transmission network. This alternative option would have the effect of removing the need for any of the proposed onshore development within Essex. The application for the Sea Link project (EN020026) was accepted for examination on 23 April 2025.

3.2.11 The applicant, along with the NF OWF and Sea Link (NGET), applied as a consortium for grant funding as part of the Offshore Coordination Support Scheme (OCSS). In December 2023 the Government announced that the consortium had been successful in receiving grant funding to explore the feasibility of a coordinated offshore solution. In March 2024, the consortium submitted a feasibility study [PD4-008] to the Department for Energy Security & Net Zero (DESNZ) as the next step of the grant funding agreement.

3.3.11. In respect of the potential alternative option of an offshore connection, the applicant confirmed to us in section 2 of [PD4-006] that DESNZ on 3 September 2024, having reviewed the feasibility study [PD4-008] had decided not to grant further funding to explore the option of a coordinated offshore connection. Accordingly, the applicant confirmed in [PD4-006] that without further funding it would no longer be pursuing the option of an offshore connection.

3.3.12. Further to our request during CAH1, Essex County Council submitted a copy of the letter issued by DESNZ [AS-011]. During CAH1, the ExA questioned the applicant about the feasibility study [PD4-008], with the applicant providing reassurance on the independence of the author of the study in investigating the practicalities of connecting to Sea Link and arriving at conclusions regarding costs and timescales in paragraph 1.3.19 of [REP1-059].

3.3.13. During the examination no parties queried the proposed landfall location. Whilst there were some issues raised regarding the siting of the proposed substation and the onshore and offshore cable routes, these were micro-siting issues rather than challenges regarding alternative routes or locations.

3.3.14. We are content that as part of the submitted ES [APP-066] the applicant has considered reasonable alternatives to the proposal for which it is seeking consent and has provided sufficient information as to why those alternatives were discounted.'

See also 9.6.18 and surrounding of the recommendation report.

3.5.4 Thus, the recommendation report makes clear <u>exactly what is **required**</u> for Five Estuaries OWF to feed in to the transmission system, and <u>it is not Sea Link</u>, rather it is the Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node substation - see also in particular 6.5.8 (within Section 6.5 "Cumulative and interrelated effects") as follows:

> *'6.5.8 In order for the proposed development to connect to National Grid's transmission system, the proposed Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node (EACN) substation would need to be operational. Despite the pre-application stage that National Grid's project is at, given the proposed development's dependency on it, the applicant's CEA affords that project greater consideration than other projects at a similar stage in the planning process. For the purposes of the cumulative assessment of the two*

projects, the worst-case delivery scenario, with limited co-ordination was assessed for the direct and indirect impacts.'

See also e.g. 10.6.1.

3.5.5 Thus we are faced with a conundrum. NGET asserts, for this Application, that CP30R/CP30AP shows the Proposals are "critical", because CP30R says Sea Link is "required" for Five Estuaries to feed in to the grid, yet NGET itself does not appear to have made that case to the Five Estuaries examining authority even though NGET participated in the examination and CP30R/CP30AP were published well within the examination. That is a remarkable curiosity.

3.5.6 Most importantly, though, if the Five Estuaries examining authority had thought Sea Link would be required for Five Estuaries to feed in to the grid, or even if there was a possibility Sea Link might be required, the examining authority would have said so, rather than dismissing Sea Link as a potential alternative for an offshore connection that had reasonably not been pursued.

3.5.7 On 17 December 2025, the Secretary of State decided to grant a DCO, accepting the recommendation report, and saying nothing material to alter the above.

3.5.8 As such, what CP30R says about Sea Link being needed to connect Five Estuaries as part of the justification for why CP30R badges Sea Link as "critical", simply does not stand up, and the Applicant is wrong to claim otherwise. Necessarily, the same is true of CP30AP.

3.5.9 That is even before coming to the remarkable curiosity that NGET was heavily engaged in the Five Estuaries DCO examination, into which CP30R/CP30AP were published, yet apparently did not advance the "need" argument for Sea Link and Five Estuaries OWF it is advancing here (and nor does it appear NGET advanced the assertions regarding boundary deficits it is also advancing here).

3.6 **As regards Rampion Extension (Rampion 2),** much the same applies, albeit the examination and decision there were slightly earlier.

3.6.1 The extension to Rampion OWF ("Rampion Extension" or "Rampion 2") was the subject of a DCO application, the examination into which completed in August 2024.[3] The examining authority's recommendation report was presented on 6 November 2024, and the Secretary of State's decision was made on 4 April 2025.

3.6.2 As such, as with Five Estuaries OWF, the chronology is important: the Secretary of State's decision came well after CP30R/CP30AP. Further, once again, as with Five Estuaries, NGET was actively involved, including by (again) entering into a SoCG with the applicant (see recommendation report at eg 6.6.45).

3.6.3 As regards the recommendation report published on 6 November 2024, there is no mention of Sea Link anywhere in the report nor any indication that further infrastructure reinforcement would be required for the "firm connection of Rampion Extension" (which

[3] Rampion 2 recommendation report and decision letter

will be made at a 400kv substation at Bolney, West Sussex, close to the western edge of the SC2 boundary).

3.6.4 The lack of reference to Sea Link is despite what was clearly direct NGET input into the process, not just the matters the subject of the SoCG between the applicant and NGET (see 6.6.45 and following), but also this at 3.3.4 specifically regarding connection:

> *'…This part of the process is not fully in the control of the Applicant. NGET ultimately determines where the most appropriate connection point should be as part of the Connections Infrastructure Option Notice (CION) process and in this case, ran parallel with the Applicants options appraisal process and focused on the technical and system capacity for facilitating an efficient new connection to the transmission network and overall consideration of cost to the consumer.'*

3.6.5 The report then proceeds, at 3.3.5, to say that in relation to connection points, NGET:

> *'…was asked to identify potential substation locations along transmission lines which largely run in an east/west alignment in the south of England. While many were identified, only three were considered as capable or potentially capable of accommodating the 1200MW to be generated by the Proposed Development. They were:*
> - *The Bolney substation, which is the proposed choice.*
> - *Fawley.*
> - *Little Horsted, which is not currently operational but is expected to be by the time the Proposed Development would be completed.'*

3.6.6 As regards the Secretary of State's decision, this was published well after CP30R and CP30AP, and it refers specifically to CP30AP, but simply to say this, at 4.5:

> *'…Following the consultation on reforms to the 2023 NPPF, a new NPPF was published 12 December 2024 ("2024 NPPF") Clean Power 2030 Action Plan ("CP2030") was published 13 December 2024 and sets out a pathway to a clean power system.'*

3.6.7 Thus, the Secretary of State specifically considered CP30AP in coming to a decision, and in no way relied upon Sea Link for Rampion Extension to feed in to the grid, indeed did not mention Sea Link at all.

3.6.8 Nor, again strikingly, does it appear NGET itself suggested Sea Link was required, despite NGET's extensive involvement in the examination (and nor, further, does it appear that NGET advanced the boundary assertions it has advanced here, including as regards SC2).

Conclusion on Applicant's attempts to rely on Clean Power 2030 as evidencing "criticality" and urgency (and, ultimately, need)

3.7 Thus, the Applicant has missed (or knowingly ignored) that the Secretary of State's decision-making on both Five Estuaries and Rampion 2, subsequent to CP30R/CP30AP simply does not rely on Sea Link to allow for either Five Estuaries OWF and Rampion 2 OWF to feed their power into the grid, and flatly contradicts CP30R/CP30AP in that respect.

Needless to say, the Applicant has also not dealt with its own apparent silence regarding a claimed need for Sea Link despite its extensive involvement in both the Five Estuaries and Rampion Extension DCO examinations.

3.8 Consistency in decision-making is a well-established principle of administrative law. The Secretary of State having granted DCOs for Five Estuaries OWF and the Rampion Extension without any suggestion that the Proposals will be needed for those projects to feed in to the grid, let alone reliance on the Proposals for that, and having done so in circumstances where the decision-making post-dated and had specific regard to CP30R/CP30AP and followed extensive NGET involvement, the Applicant's case that CP30R/CP30AP establish "critical" and "urgent" need for the Proposals simply cannot stand.

There is no contradiction between this and the Secretary of State's general support for CP30R/CP30AP, including in the 2026 NPSs: CP30R/CP30AP cover many and various topics, and the fact they have been superseded as regards one item, these Proposals, would hardly be expected to invalidate them as a whole.

3.9 SEAS notes that its position in respect of the fatal flaws in the Applicant's case relying on Clean Power 2030 is supported by East Suffolk Council (**REP5-189**, point 1 regarding ExA 2GEN2.). ESC aligns with SEAS, and ESC moreover highlights the consequential knock on for EN-1: that EN-1 cannot be said to "have effect" as regards these Proposals where the material on which EN-1 relevantly relies does not in fact evidence a need for the Proposals.

3.10 All of this is before coming to the interesting feature that it does not appear the Applicant advanced the various boundary claims it advances here in those DCO examinations.

4. WHY APPLICANT IS WRONG TO RELY ON GRANT OF EARLY CONSTRUCTION FUNDING IN SUPPORT OF ITS "NEED" CASE

4.1 At **REP5-142** para 3.5.7 the Applicant attempts to pray in aid Ofgem's decision of 19 November 2025 granting "early construction funding" for the Proposals, as evidencing that the Proposals are something which is "*in the national interest to be delivered as soon as possible'.* This is patently incorrect, and it is deeply depressing that the Applicant has resorted to such a bootstraps argument, which SEAS has long argued it would attempt if granted early construction funding.

4.2 OFGEM has stated clearly:

> *'Approval of ECF does not constitute a full funding decision on the project. It is also not a relevant consideration or predeterminant of the DCO approval process.' (Ofgem 19 November 2025 'Sea Link - Decision on Early Construction Funding and Modification to special conditions of the electricity transmission licence', point 3.13)*

4.3 The Applicant's assertion is an unjustified distortion of Ofgem's decision-making. That the assertion is made at all is further evidence of the Applicant clutching at straws in an attempt to justify the Proposals.

4.4 To the contrary, a point of substance to emerge from the early construction funding process, was Ofgem's recognition that European wide demand for the materials required by the Proposals (particularly HVDC cable) had massively driven up the potential costs of

the Proposals. All of which was before the Israel/US war on Iran, with its attendant consequences.

5. COMMENT ON THE APPLICANT'S VARIOUS REP5-142 ASSERTIONS REGARDING "SIZEWELL GENERATION GROUP" "NEED"

5.1 SEAS has been over the technical detail of the collapse of the Applicant's "Sizewell Generation Group" "need" case before (see e.g. SEAS' written representation on "need" **REP1-281**), and does not repeat that. However, the Applicant makes various unjustified assertions in **REP5-142** that we correct for completeness. We take them largely in order of appearance, but also thematically where possible.

5.2 At para. 2.1.4 the Applicant says this (our emphasis):

> '***During the application*** the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW'.

This claim then forms the foundation for what follows in REP5-142, including section 3.1 where the Applicant simply ignores the 2024 reduction in the "worst case" "need" in favour of distracting arguments about licence obligations.

The Applicant knows it is simply not true that the reduction occurred "during the application". As we have previously demonstrated, the Nautilus project was removed from NESO's Connections Register well before the Applicant made this Application in March 2025, and the Applicant knew Nautilus would not be a factor for Sea Link many months before the Application was made (since Ofgem announced its formal decision to move the Nautilus project connection to the Isle of Grain in Kent in November 2024[4], and the project owners, NGV, confirmed the change at the same date).

The Applicant's continued insistence in pushing this false history speaks volumes: it was the Applicant's decision to press on with the Application despite knowing its "need" case had collapsed, and without even updating its documentation accordingly, and it is right the Applicant live with that.

5.3 In similar vein, the Applicant is plainly wrong to assert (para. 3.1.1) that:

> *'….there presently is a requirement to provide additional capacity of 352MW'.*

Insofar as such a worst-case fault requirement might arise, it will not arise until the late 2030s at the earliest, and only then if: both Sizewell C reactors are fully operational and Sizewell B is granted an extension to its operating life and all the current OWF contracted connections are made and LionLink is fully operational (as SEAS has previously explained). Without LionLink, there would be a healthy surplus of transmission capability for the Sizewell Generation Group way beyond 2040. As the ExA knows, SEAS' position is that the non-consented LionLink Interconnector, can and should be taken elsewhere,

[4] https://www.ofgem.gov.uk/press-release/empowering-great-britain-clean-and-flexible-energy-future-next-generation-interconnectors

and at this stage cannot be used to support the Applicant's argument for a 'present deficit.' or even a future deficit.

5.4 Turning to the scale of the deficit, para. 3.1.2 refers to 352MW as still being a "significant shortfall", and seeks to bolster that claim by reference to a notional number of households' demand (and para. 2.1.4 describes this as a "sizable need"). The problem the Applicant faces, though, is that it is clear that the Applicant's original "need" case and justification for these 2,000MW link Proposals was based on a c.2,000MW transmission deficit. In those circumstances, the 2000MW Sea Link HVDC solution might have seemed a proportionate solution, at least in terms of capacity (if not necessarily in terms of cost/economic efficiency or environmental impact) but now any "worst case" "need" is only 352MW, that rationale falls away, and with it any claims to proportionality, economy and efficiency.

5.5 We can similarly dismiss section 3.1, which is largely a recital of the Applicant's contractual obligations as an Electricity Transmission Licence owner and does not add materially to, or materially depart from, the policy tests and, ultimately, the overarching statutory tests. The use of a sledgehammer to crack a nut is as non-compliant with those contractual licence obligations, as it is with policy and the statute.

The Proposals cannot be claimed as the solution to future 'network design' issues, unless those issues are clearly identified and their resolution tied to the Sea Link project. The attempt to do so brings into view the oddity that the "additional transmission system capacity" it notionally refers to may perhaps more simply be described as NGET's sister company NGV's LionLink project, which at present is the only forecast driver for the residual 352MW worse case fault need in the Sizewell group.

5.6 Ultimately, the Applicant has fallen well short of making out a case, let alone a "compelling case", that the Proposals, with their scale and impact, represents a policy compliant "economic and efficient" response to what remains of a further "worst case" transmission "need". Nor has the Applicant come close to showing that smaller, cheaper or more targeted infrastructure would not suffice. SEAS refers to its case as set out previously that there are policy compliant alternatives, which meet the tests of economy and efficiency, and would provide transmission capability to deal with the 352MW worst case, along with meeting what the Applicant identifies as the Kent issue.

6. APPLICANT'S ASSERTIONS OF "NEED" BASED ON BOUNDARY CONSTRAINTS AT EC5, LE1, SC2

6.1 It is plainly right that (para 3.1.6 of [REP5-142]) the Applicant must *'ensure sufficient capacity for connections and systems reinforcement to reach compliance with the NETS SQSS'*.

However, we firmly reject the further suggestion that the Proposals are <u>required</u> for reasons other than the Sizewell Generation Group "need", in that *'…addressing the shortfall in the Sizewell Generation Group is only one of a number of objectives including providing capacity contributions to EC5, LE1 and SC2 (Kent)'*.

We will show instead that:

- APP-320 is incorrect and defective in its calculations of boundary capacity for EC5 and LE1, and that in fact no deficits exist across those boundaries if all relevant upgrades and projects are included;

- our suggested "Economic and Efficient" solutions (in Suffolk and Kent) fully solve both the Sizewell Group and SC2 deficits (similarly see next section below);

- and, moreover, that Sea Link itself *fails to solve* the SC2 transfer deficit (see also REP5-206) and therefore, to borrow the Applicant's logic, is not NETS SQSS compliant, and arguably the Applicant is in breach of its license;

- and, whilst Sea Link *might* contribute to wider network reinforcement (EC5, LE1), there is no particular detailed or demonstrated requirement relating either to its deficit contributions or to the connection of specific projects.

6.2 Whilst the para. 3.1.6 claim that Sea Link is 'required to add capacity to the EC5, LE1 and SC2' is boldly made, as were the similar claims of "requirement" in **APP-320**, it is striking that for these claims the Applicant offers nothing by way of hard evidence, explanation or analysis. In **APP-320** that is reserved for the Sizewell Generation Group need, which numbers have collapsed.

6.3 Rather, APP-320 sets out the various asserted boundary deficits, but does not disaggregate, model, analyse or quantify the contribution made by Sea Link to resolving those deficits. Indeed, we will show in some detail in section 7 immediately following that these deficit calculations are simply incorrect, or out of date. For example:

The EC5 boundary deficit is put forward by the Applicant as being around 9,700MW – the calculation being a planned transfer of c.23,008MW and a post-fault capacity of 13,304MW. Both of these figures are in error, the transfer still including Nautilus'1,500MW and the actual capacity being 23,339MW (the details are in 7.4.2 below). We cannot tell how this latter error has occurred, as the Applicant provides no evidence for their figure of 13,304MW; Using the correct figures, there is no deficit.

Similar errors are made in the calculation of the LE1 boundary – the planned transfer of 13,856 once more includes the no longer extant 1,500MW of the Nautilus project; and the 6,930MW post fault capacity of the planned Norwich to Tilbury OHL has been omitted. The apparent deficit of 7,467MW therefore disappears.

A different category of error has been made in the Applicant's approach to the 6,516.2MW deficit across the SC2 boundary. The Sea Link proposal (£1.18bn baseline cost) will meet less than a third of this deficit, and will not be NETS SQSS compliant. SEAS' revised proposal for a 400kV 6930 MVA OHL between Canterbury North and Kemsley at less than 10% of Sea Link's cost *would* be compliant, and reduce or resolve other issues as well.

The same applies to the *Conclusions*, para. 3.6 of REP5-142, which merely demonstrate that 'additional resilience' would be derived from additional resource. The Applicant has not demonstrated that Sea Link itself is necessary, as opposed to being merely one of a number of alternative reinforcements, and almost certainly not the ideal alternative. The details in sections 7.4.1 to 7.4.6 below make this entirely clear.

6.4 As regards Kent specifically, whilst 3.1.6 refers to Sea Link's contribution to capacity across the EC5, LE1 and SC2 boundaries, Sea Link addresses, as we have set out, only a portion of the SC2 transfer deficit identified by the Applicant, (2000MW of a 6,516.2MW deficit).

6.5 As regards EC5 and LE1, [APP-320] fails to quantify Sea Link's contribution to the EC5 and LE1 boundary deficits. Essentially Sea Link would form part of a wider set of reinforcements addressing those boundary constraints, but the Applicant does not demonstrate that planned generation could not connect in Sea Link's absence or via alternative reinforcement – it is a case relying on an unparticularised assertion that 'Sea Link contributes to wider network reinforcement', rather than a demonstrated requirement for the connection or firm connection of the specific projects identified. To say Sea Link is "required" is a material overstatement. SEAS will demonstrate in the next section that there is a more economic and efficient solution to contribute to wider network reinforcement.

7. **ALTERNATIVE REINFORCEMENT OPTIONS – ENSURING AN EFFICIENT AND ECONOMICAL SOLUTION**

7.1 We have noted elsewhere in this submission that we are able to demonstrate an alternative solution to the reinforcement and capacity issues to the Sea Link proposal, and here, for the avoidance of doubt, SEAS outlines the alternative solution of **installing a new 400kV 6.930MVA double circuit OHL between Sizewell and Bramford over a distance of 55km.**

NOTE In para 3.2 Rebuttal point 2 of REP5-142, the Applicant states that higher capacity cannot be achieved for the Sizewell Group through reconductoring of the Sizewell to Bramford double-circuits, as its assumed capacity limits of 6930MW (or MVA) per double circuit already takes into account a future upgrade/reconductoring programme. SEAS fully accepts this - the planned reconductoring had not been identified in any application document, and so we were unable take its future capacity contribution into account. This has no effect on our current proposed alternative as it is set out below.

7.2 Cost. and Effectiveness

7.2.1 Using data produced by the Institute of Engineering and Technology's "*A Comparison of Electricity Transmission Technologies: Costs and Characteristics",* Mott MacDonald April 2025 (IET 2025, page 48), it is possible to calculate the cost of this proposal, which would be approximately **£170m** and:

i. would readily solve the 352 MVA deficit problem,
ii. be SQSS compliant and
iii. provide much greater post fault network redundancy, resilience and security than a single point-to- point solution like Sea Link.

This is a viable, more economic and efficient solution than Sea Link, to cover the minimal worst case post-fault deficit on the Sizewell Group.

7.3 SEAS suggests that (in addition to building a third double circuit between Sizewell and Bramford) there may also be other options here which could allow for additional capacity

for the Sizewell to Bramford double-circuits. The Applicant states in APP-320 that the assumed capacity for the Sizewell to Bramford double circuits are "considered at" 6,930 MVA. **This is a chosen assumption, not a fixed parameter,** and we have carried out a more detailed analysis to determine the likely capacity in practice. The additional capacity for the existing double circuits could include:

7.3.1 **An increase from 6,930 MVA to approximately 7,482 MVA (**2 x 3,741 MVA) transfer capability, using industry standard assumptions and IET 2025 benchmarks. This would be more than sufficient to address the 352 MVA deficit. The IET 2025 report , identifies a “high” rating case benchmark of 3,741 MVA per circuit for 400 kV overhead lines (Table 4.1, p.35; Table A.7, p.158), based on standard double-circuit configurations and derived from National Grid TGNI026 (Issue 6, Feb 2021) assumptions. This would equate to a transfer capability of approximately **7,482 MVA** (2 × 3,741 MVA) in comparison to NGET's more conservative assumption in APP-320 of **6,930 MVA** (2 x 3,465 MVA) and would therefore be more than sufficient to address the 352 MVA deficit.

7.3.2 Using IET 2025 benchmarks, we can show that switchgear may have post-fault loading capability of up to c.**4,192 MVA** under winter conditions (10°C ambient), based on current levels of around 6,050A. This additional capacity could be available for up to 24 hours post-fault, increasing the transfer capability from **3,741 MVA** under certain standard circumstances.

Whilst in the IET (2025) high-case scenario, the overall circuit rating is constrained to **3,741 MVA** by the associated cable section (Table A.7, p.158), the overhead line and switchgear capability may be higher, with IET 2025 indicating that switchgear may have post-fault loading capability of up to c.**4,192 MVA** under winter conditions (10°C ambient), based on current levels of around 6,050 A (Table A.6, p.158). It therefore might also be possible, in addition to the 'high' capacity figure mentioned above, to run the circuit at higher temperatures and even higher capacity for up to 24 hours (24hrs is the assumption in Table A.7, p.158). Modern double-circuit technologies are known to be robust and faults are typically fixed in hours.

7.3.3 Given that we can assume that the Sizewell to Bramford double circuits will be reconductored/upgraded before Sizewell C is operational, and that network deficit issues practically only arise during peak winter demand periods, when ambient temperatures are low, it is not unreasonable to assume that capacities closer to the high rating case of **7,482 MVA** per circuit might be possible.

7.4 We turn now to Para 3.2.9, in which the Applicant states that solving the Sizewell Generation Group deficit in the manner described above “would not address the required need across EC5, LE1”. We will take each of those boundaries in turn, and will demonstrate that to the contrary, we can show that they do address these issues – whereas Sea Link, unfortunately, does not.

7.4.1 **EC5**

The EC5 deficit stated by the Applicant is circa **9,700MW**, based on a planned transfer of 23,007.7MW and a post fault (Walpole to Pelham) capability of 13,304MW which once again incorrectly include the Nautilus project. and the correct **planned transfer is 21,507.7MW.** The Applicant provides a figure tor that EC5 post fault transfer capacity of 13304MW, which it claims leads to a transfer deficit of 9703.7MW (Table 3.3.).

7.4.2 However, SEAS suggests that the post fault transfer capacity of 13,304MW is also incorrect. It would appear that the Applicant has failed to include the Bramford to Twinstead upgrade (whose DCO approval would have been known to them some six months earlier) and the existing Bramford to Pelham OHL. Unfortunately, the Applicant does not appear to provide any evidence of how they arrive at their figure of 13,304MW. We understand that the correct transfer capability across is EC5 is (in round numbers):

Norwich to Tilbury new OHL	6,930MW
Bramford to Twinstead new OHL	6,930MW
Bramford to Pelham existing	3,102MW EN020002 APP-161 (Table 3.3)
Bramford to Rayleigh with upgrade	6,380MW (APP-320 p36)
Total capability across EC5	**23,339MW**

7.4.3 This exceeds the planned transfer of 21,507.7MW. It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. **Norwich to Tilbury is critical, Sea Link is not**.

7.4.4 **LE1**

For LE1, the Applicant states the deficit to be **7467MW,** based on a planned transfer of **13,856MW** and a post fault (Pelham to Rye House) capability of **6380MW**. This once again incorrectly includes the Nautilus project. reducing the planned transfer to **12,356MW.**

7.4.5 Further, the post fault capability across LE1 only appears to include (Pelham to Rye House) of 6380MW and does not appear to include the planned Norwich to Tilbury OHL capacity of 6930MW. The post fault capability across LE1 will in reality, therefore, be **13,310MW** which exceeds the planned transfer of **12,356MW**. Further figures supporting this are in *Further* Details. **It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. Norwich to Tilbury is critical, Sea Link is not.**

7.4.6 **SC2**

For SC2, there is a transfer deficit of 6,516.2MW, and there appear to be two alternatives:

- Sea Link, at a cost of at least £1.1 billion (in 2018/19 baseline cost). Unfortunately, this project only deals with 2000MVA which leaves an unsatisfied deficit of 4,516.2MVA. **This solution is therefore not NETS SQSS compliant.**

- Installing a new 400kV 6930 MVA OHL between Canterbury North and Kemsley at a cost of circa £90m. This would be NETS SQSS compliant and would give extra resilience to the network.

This solution would actually solve the SC2 transfer deficit, which Sea Link does not. NESO have noted that a fault at either end of Kemsley to Lovedean can turn it into a long radial feeder, placing all the load on the remaining two circuits" This problem would be reduced by the SEAS solution set out here.

7.5 In most cases, the infrastructure improvements that will enable the system to be NETS SQSS compliant are already in place or are planned,. It may be necessary for some minor infrastructure improvement, but this would be at a far lower cost in financial, environmental and socio-economic terms than Sea Link. **It should be noted that even if**

Sea Link were to be granted a DCO, there would still need to be infrastructure improvement in SC2 to overcome the remaining 4,192MW deficit.

7.6 In 3.2.10 of REP5-142, NGET claims that "The new circuits as suggested by SEAS would be a piecemeal approach that would not address the full need as described above". SEAS can show that the solutions presented, combined with existing planned infrastructure upgrades, offer a complete solution that covers all the stated boundary deficits, post-fault conditions, and most particularly that of SC2, which, as set out above, will never be discharged by Sea Link, alone.

Far from being isolated solutions, as suggested by the Applicant, the upgrades put forward by SEAS provide a coordinated, economical and efficient grid system listed here in full:

a) Sizewell to Bramford:

i) Links with the new Bramford to Twinstead reinforcement. (EN020002)
ii) Links with the proposed Norwich-Bramford Tilbury upgrade. (EN020027)
iii) Links with the proposed Pelham to Rayleigh upgrade.

b) Canterbury North to Kemsley:

i) Links to Tilbury via the new upgraded OHL between Kemsley and Littlebrook.
ii) Links with Tilbury via Grain.
iii) Links with the London Power tunnels via Littlebrook.

In combination:

Sizewell to Bramford to Tilbury to Littlebrook to Kemsley to Canterbury North.

c) Canterbury North to Kemsley new OHL

The Applicant included a new OHL between Canterbury North and Kemsley in its option choices for the Norwich to Tilbury upgrade (EN020027) which is the subject of a separate DCO.

In EN020027 APP-357 pages 45 and 46 the new Canterbury North to Kemsley OHL is referred to as CAKE.

The East 3 option, fully analysed by the Applicant, included the Canterbury North to Kemsley (CAKE) and Bramford to Tilbury (ATNC) upgrades. The East 3 option also included Tilbury to Grain (TENC) but this does not have a proceed signal. However, according to EN020027 APP-357 p46 the "Tilbury to Grain and Tilbury to Kingsnorth upgrade (TKRE) does have a proceed signal".

This gives an additional connection:

Sizewell to Bramford to Tilbury to Grain to Kemsley to Canterbury North.

In reality, there is no reason for electricity to flow from Sizewell to Kent and vice versa because both have an excess of supply over demand. What is achieved by the two upgrades suggested by SEAS, in addition to the points already made, is that it enables electricity to flow from Sizewell to Tilbury and from Canterbury North to Littlebrook via Kemsley to serve the high electricity demands of the London area.

7.7 The Applicant also suggests at 3.2.10 of the rebuttal document that the suggested new circuits could not be delivered in the timescales required to deliver system need and consumer benefit. The question of timescales has already been addressed above, but it is clear that for the Sizewell Group, as has already been stated, the 352MW deficit will only occur in the mid-late 2030s, which gives more than sufficient time for such an upgrade to occur. For the SC2 boundary, even if Sea Link were to be approved, there would still be a worst-case N-1 deficit of an additional 4,516.2MW to be addressed by further infrastructure reinforcement requiring separate planning permission. It is odd that in *Beyond 2030 "A national blueprint for a decarbonised electricity system in Great Britain*" published by NG ESO in March 2024, there are no proposals in this timeframe for additional capacity that would meet the boundary issues identified – for example (p111) the document states for the Southeast region "No new upgrades are currently required in this region".

7.8 We have shown that the overall plan from SEAS is coordinated, economical and efficient and completely resolves the deficits for the Sizewell Group and SC2 boundary., and also that this is simply not the case for the Applicant's project.

8 OVERALL CONCLUSIONS

8.1 For the reasons set out above, the Applicant's rebuttal does not materially address the core points raised by SEAS in relation to the Need case. In particular, the Applicant has not demonstrated that Sea Link is 'required' in the sense relied upon in its submissions, nor that it represents an 'economic and efficient' means of addressing the identified constraints. The evidence before the Examination therefore continues to indicate that the claimed need for Sea Link is overstated, uncertain, and dependent on assumptions that are no longer robust.

8.2 The foundational 2,000MW 'worst-case' deficit used to justify the scale of Sea Link has collapsed to a mere 352MW following the removal of Nautilus; consequently, the Applicant is now attempting to retrofit a multi-billion pound solution to a problem that has shrunk by nearly 85%. By pivoting to 'strategic' generalities, the Applicant is seeking to justify an over-scaled, 2,000MW HVDC project as a solution to a residual 352MW deficit that will not even materialize until the mid-to-late 2030s.

8.3 The Applicant's reliance on the Clean Power 2030 report to claim 'criticality' is flatly contradicted by the Secretary of State's DCO decisions for Five Estuaries and Rampion 2, which grant consent without any requirement for or reliance upon Sea Link for grid connection. It is a 'remarkable curiosity' that while the Applicant claims Sea Link is critical for other offshore projects in this Examination, it remained silent on this alleged dependency during the actual DCO examinations for those very projects.

8.4 The attempt to use Ofgem's grant of Early Construction Funding as evidence of 'national interest' is a transparent 'bootstrap' argument that ignores Ofgem's own explicit clarification that ECF is neither a full funding decision nor a pre-determinant of the DCO process.

8.5 The Applicant's assertions regarding boundary constraints at EC5 and LE1 are manufactured constructs based on stale data that fail to account for the dramatically

reduced boundary deficits when all relevant projects and upgrades are taken into account.

8.6 The existence of credible, NETS-SQSS compliant alternatives - deliverable at a fraction of the cost - demonstrates that Sea Link is neither an 'economical' nor 'efficient' solution as required by National Policy Statement EN-1. True urgency in the clean energy transition demands that the 'right' solutions are deployed quickly; forcing through a mislocated and over-scaled project like Sea Link risks stranded assets and unnecessary environmental destruction.

8.7 Ultimately, the Applicant is pursuing a solution in search of a problem. By failing to revisit its "need" case after the removal of the Nautilus project, the Applicant has presented the Examination with a project designed for a scale of generation that no longer exists in the Sizewell Group. True urgency in the national transition to clean power demands the deployment of the right infrastructure, not the forced delivery of an over-scaled, mislocated, and environmentally damaging project that represents a waste of bill payers' money. Because the Applicant has failed to demonstrate that Sea Link is necessary, proportionate, or the most efficient means of meeting the actual transmission deficit, a compelling case for development consent has not been made.

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