



SEAS DEADLINE 7 SUBMISSION ON

NEEDS

PINS Ref: EN020026
DEADLINE 7: 29 APRIL 2026

SEAS IP: [REDACTED]
Date: 29 APRIL 2026

Introduction

1. In REP6-256A, SEAS set out a number of issues that have not been resolved, within the process of claim and rebuttal on the subject of the Needs Case for the Sea Link Project. Many substantive points still remain outstanding and unanswered by NGET.

The more SEAS has investigated the Applicants Need case, the more obvious it has become that there is no Need case.

2. It is obvious to SEAS that NGET's Application was probably started several years ago and was based upon assumptions that might have been relevant, then.
3. However, as this Examination has uncovered, a crucial number of those assumptions are no longer valid. Despite this, the Applicant has ploughed-on regardless in search of a problem to justify their uneconomic and ineffective "solution".
4. The most obvious mistake arose after the transfer to Grain (from Friston) of Nautilus. This change has infected so many of NGET's inaccurate claims throughout this Application. The change occurred many months before the start of the Examination and well before NGET's Application was submitted.
5. Despite this, NGET repeatedly keep referring to Nautilus as having "changed during this Examination", which is entirely untrue.

Failure to demonstrate that Sea Link meets the Applicant's original claimed Need

6. If, before submission of this error strewn Application, NGET had done a thorough review of all their base assumptions, this Application would probably never have been submitted, as it is clear:
 - 6.1 The deficit in Suffolk that Sea Link is supposed to cover is much smaller than claimed and can (on a worst case basis) be met readily by much cheaper, less intrusive solutions, proposed by SEAS.
 - 6.2 The 352MW Sizewell deficit, which is the cornerstone of NGET's Need case only occurs towards 2040, and only because it is needed to enable

the connection of a non-regulated interconnector asset (LionLink) by a sister company NGET, National Grid Ventures, which is not consented and does not even need to be connected at Friston.

- 6.3 The ExA may care to consider the purpose of this interconnector and its lack of benefit to UK energy security. It is most certainly not part of the “great green grid upgrade”. NGV’s case to OFGEM for “in principle” approval for LionLink in 2024, was projected almost entirely on **EXPORT** of energy from the UK, not import. Indeed, OFGEM remarked that net import “could reduce the overall socio-economic benefits to the UK consumer”.
- 6.4 In any event, until the 2040’s during any period of low generation from wind, the Netherlands will have a deficit of exportable energy.
- 6.5 If this Application is granted consent, it would require UK billpayers to pay for Sea Link (which is patently unnecessary) which enables LionLink to be economically connected at Friston by NGV (NGET’s sister company).
- 6.6 The small residual Sizewell Need (& even then only potentially in the late 2030s) that the Applicant claims must be met, is required solely to support NGV’s planned LionLink, whose principal purpose will be to generate profits for National Grid shareholders, by export of UK energy.
- 6.7 LionLink does not need to be connected at Friston. It could be connected at the East Anglia Connection Node and still achieve the same export objective.
- 6.8 On that basis, the need for a third OHL between Sizewell and Bramford would fall away and the already minimal cost of SEAS’s solution would be £170m less.
- 6.9 However, the alternative SEAS solution of reinforcing Sizewell to Bramford will work regardless of whether LionLink (if consented) is actually connected at Friston or elsewhere.
- 6.10 In Kent, the forecast SC2 boundary transfer deficit will never be fully met by Sea Link, in any circumstance. It requires additional reinforcement. SEAS has suggested how that can be delivered at cost of £90m, compared to the white elephant of Sea Link.
- 6.11 The Applicant’s boundary deficit claims are inaccurate, often because of their exclusion of known network upgrades, some of which were consented well before this Examination and whose implementation are now underway.
- 6.12 The Applicants planned transfer capacities are likewise inaccurate and unreliable, most principally because, yet again, the Applicant have been unwilling to revise their data to reflect the removal of Nautilus.
- 6.13 What is necessary to ensure the grid is reinforced in East Anglia is the Norwich to Tilbury reinforcement, but certainly not Sea Link.
- 6.14 The Applicant’s claim that Sea Link is “critical & urgent” and required by NESO’s 2024 Clean Power 2030 report, has been shown to be erroneous and fails on decision-making and policy support for prior DCO approvals.

7. It is evident to anyone dispassionately reviewing the Applicants evidence, that the proposed Sea Link is neither efficient nor economic.
8. The basis of the Needs Case has fundamentally altered, but NGET's argument has not.

SEAS offers a realistic, significantly lower cost solution that meets the actual Need, is NETS-SQSS compliant and is Economic and Efficient.

9. SEAS therefore strongly suggest that the detailed case for their alternative and lower cost solutions set out in SEAS' REP6-256A, requires the Examining Authority's close attention, given the adverse financial, socio-economic and environmental risks of the Applicants proposals.
10. Those SEAS (worst case) proposals (including installing a new 400kV 6930 MVA OHL between Canterbury North and Kemsley and (possibly) a new 400kV 6.930MVA double circuit OHL between Sizewell and Bramford over a distance of 55km and) will meet actual, (rather than incorrectly calculated current and forecast capacity requirements), will be SQSS compliant (Sea Link will not be SQSS compliant in SC2 without further, unplanned works), and will cost a tiny fraction of the estimated NGET Sea Link project cost.
11. They would be deliverable within the Sea Link time frame.
12. Even accepting LionLink at Friston, SEAS' proposed reinforcement options would provide a lower-cost and more proportionate means of addressing the Applicant's claimed deficits than Sea Link.
13. Moreover, if National Grid were pragmatic and exercised co-ordination and co-location, then NGV could move LionLink from Friston to the planned East Anglia Connection Node or elsewhere. Then, the small (worst case) Sizewell deficit of 352MW would disappear and there would be a surplus on that circuit into the 2040's. The c. £170m cost of a new double OHL between Sizewell and Bramford could be deleted, reducing the overall cost of the SEAS solution to just c.£90m. Truly economic and efficient.

Conclusion and recommendation

14. NGET's Sea Link project represents a solution to a problem that no longer exists, based on erroneous policy claims and incorrect capacity data, and the local issues in both Kent and Suffolk have better, more economic and more efficient solutions. In the absence of evidence, the precautionary approach must be assumed.
15. Since NGET did not respond to SEAS's REP5-147¹ requesting an update on the incremental costs of Sea Link, arising from the multiple project changes during the Application and certainly did not challenge the SEAS assumptions, it is reasonable to conclude that the cost of Sea Link *in today's money will be in excess of £3bn*, yet in Kent it will still not be NETS-SQSS compliant.
16. It is impossible that Sea Link (costing £3bn+), can meet the test set by EN-1 of being "economic and efficient", whereas SEAS's solution is both NETS-

SQSS compliant and could cost much less than 5% of the likely cost of the Applicants Sea Link proposal.

17. SEAS urges the Examining Authority to reject this Application. It is both an extravagant waste of UK billpayers money and entirely unnecessary to resolve the Applicants stated Need.

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-002978-4.SEAS%20D5%20How%20can%20it%20be%20Economic%20%26%20Efficient%20-%20FINAL.pdf>