

Sea Link DCO

Comments on the responses to the Secretary of State's request for information of 28 August 2026, made in response to the Secretary of State's invitation to all Interested Parties of 22 September 2026, on behalf of Suffolk Energy Action Solutions (SEAS)

To: The Rt Hon Miatta Fahnbulleh MP, Secretary of State for Energy Security and Net Zero

c/o: Energy Infrastructure Planning Delivery Team, Department for Energy Security and Net Zero (DESNZ)

Via Email: SouthEastAngliaLink@planninginspectorate.gov.uk

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Interested Party Reference: SEAS ([REDACTED])

Date: 21 October 2026

1. Introduction

1.1 Suffolk Energy Action Solutions (SEAS) makes these comments in response to the Secretary of State's letter of 22 September 2026, which invites all Interested Parties to comment on the responses to the Secretary of State's request for information of 28 August 2026.

1.2 SEAS comments principally on the Applicant's response of 18 September 2026 (Application Document 9.158, [C1-178](#), EN020026-003894), in particular its answers to questions 13, 39, 50, 55 and 58. Those answers must be read alongside two documents published by Ofgem, the economic regulator: its consultation [Sea Link – Project Assessment](#) of 1 September 2026 (the Ofgem Assessment), and its [Sea Link – Decision on Early Construction Funding](#) of 19 November 2025 (the Ofgem Funding Decision). SEAS also refers to the National Audit Office report [Upgrading the electricity transmission network](#) ([HC 589](#), 11 September 2026) (the NAO Report).

1.3 These comments should be read alongside SEAS' representation of 17 September 2026 ([C1-074](#)), which set out the legal framework and SEAS' concerns arising from the Ofgem Assessment of Sea Link and the NAO Report, including the harmonics issue, cost, the need case and the lower-cost alternative. For the Secretary of State's convenience, SEAS summarises below the matters from that representation most

relevant to the Applicant's subsequent responses to the Secretary of State's request for information, together with the additional evidence and outstanding questions that arise.

1.4 SEAS does not repeat the evidence it submitted to the examination, but refers to the relevant documents in the examination library by their document references.

2. Summary

2.1 In summary, SEAS submits that:

(a) Asked for '*any other outstanding or relevant matters*' (question 58), the Applicant said it had '*no further response*'. It did so 17 days after Ofgem published that Sea Link faces an unresolved harmonics problem, which Ofgem says requires further work '*elsewhere on the transmission network*' and which, if unresolved, would mean the project's outputs are '*not being achieved*'. The Applicant's answer on converter station design (question 13) is also silent on it. SEAS is not aware that the issue was raised with the Examining Authority. The Applicant's later assurance, in its letter of 16 October 2026 (Application Document 9.159, [C3-002](#), EN020026-004014) (the Applicant's 16 October letter), that the solution lies within the converter station compound is unsupported by studies and does not address what Ofgem records it as having said (paras 3.10–3.12 below).

(b) On Ofgem's account, those further works are not defined, located or assessed. Ofgem treats them as part of Sea Link's scope. They cannot be covered by the environmental documents the Secretary of State would certify (question 50), and a requirement deferring them cannot cure that.

(c) Nor did the Applicant tell the Secretary of State, or, so far as SEAS is aware, the Examining Authority, that in January 2026 it had asked Ofgem for £3.197bn (2023/24 prices), or £2.567bn in 2018/19 prices (Ofgem Assessment, para 1.14). The capital cost in its need case was £1.154bn ([APP-320](#), Table 11.1), stated in 2020/21 prices ([APP-320](#), Appendix D), although the Applicant has elsewhere described it as being in 2018/19 prices. Compared in 2018/19 prices the request is about 2.2 times that figure. Converting the APP-320 figure from 2020/21 to 2018/19 prices would only increase that ratio.

(d) The only quantified consumer benefit put forward for Sea Link is NESO's estimate of the constraint cost of one year's delay in 2030 (Sea Link delivered in 2031 rather than 2030). Sea Link's regulatory target delivery date is December 2031 (Ofgem Assessment, executive summary), so based on the regulator's own target date that benefit would not be realised. The estimate has not been updated since November 2024 (Ofgem Funding Decision, para 3.45), its interconnector assumptions date from early 2024 ([NESO, CP2030 Assumptions](#)), and NESO has not said whether or where Nautilus was modelled (see paras 8.4–8.5 below).

(e) The information needed to resolve these matters exists or can readily be obtained. SEAS asks the Secretary of State to obtain it, and to extend the determination timetable under section 107(3) of the Planning Act 2008 to allow that.

3. Harmonics: the Applicant's responses to questions 58 and 13

3.1 Question 58 asked: *'The Applicant is requested to provide an update on any other outstanding or relevant matters to the Proposed Development.'* The Applicant's response, in full, was: *'The Applicant has no further response.'*

3.2 Seventeen days earlier, on 1 September 2026, Ofgem had published the following about Sea Link:

'The harmonic studies undertaken indicated that, even with the largest filter solutions proposed by bidders on the Project, compliance with applicable harmonic limits was unlikely to be achieved under all system conditions.' (Ofgem Assessment, para 1.15)

'We understand that the activities proposed by NGET in this PA do not fully resolve the harmonics issue. NGET anticipates that additional activity is required elsewhere on the transmission network to resolve this issue ... although the precise scope and location will depend on the solution identified. Such actions may include wider reinforcement or additional harmonic mitigations.' (para 1.16)

'Any derating of the circuit due to related wider or localised harmonic issues as a result of the Project will result in Outputs of the Project under its licence not being achieved.' (para 1.12)

'We consider that addressing the identified harmonics issue is a necessary component of delivering the Outputs and consumer benefits associated with Sea Link.' (para 1.18)

3.3 Ofgem also records that Sea Link's scope of work includes *'Such further work as may be required to ensure NGET's compliance in respect of Sea Link with Grid Code CC.6.1.5 (including Engineering Recommendation 5/5) ... and ensure the link can work at its designed full capacity of 2GW'* (para 1.11).

3.4 The draft Order already authorises 'filter banks' within the converter stations (draft Order, [C1-180](#), Schedule 1, Work Nos. 3B(k) and 9B(k)). Ofgem's point is that even the largest filters proposed would not achieve compliance, and that further works are needed elsewhere on the transmission network (Ofgem Assessment, paras 1.15–1.16).

3.5 Ofgem says the problem was identified *'during the detailed design and procurement of Sea Link'* (para 1.15). The main contracts had been let, and the Applicant's final Project Assessment was submitted to Ofgem *'in January 2026'* (para 1.14), while the

examination was still open; it closed on 5 May 2026. SEAS is not aware that the issue was raised with the Examining Authority at any point.

3.6 The Applicant's answer to question 13, on converter station design, states that *'Main works contractors have now been appointed for both the converter/ substations and cables works and are progressing designs, but designs have not been finalised'*, and that the Critical Design Constraints *'cannot be understood in full until detailed design and options for equipment selection are fully understood'*. It does not mention harmonics, although that is the design issue Ofgem says has emerged from exactly that detailed design and procurement.

3.7 Nor do the updated control documents the Applicant has submitted in response to the request for information, including the draft Order ([C1-180](#)), its Explanatory Memorandum ([C1-182](#)), the Register of Environmental Actions and Commitments ([C1-215](#)), the Design Principles – Suffolk ([C1-191](#)) and the Outline Onshore Construction Environmental Management Plan ([C1-196](#)), refer to harmonics. Nor do the revised versions submitted with the Applicant's 16 October letter (C3-002): the draft Order ([C3-003](#)), its Explanatory Memorandum ([C3-005](#)), the Register of Environmental Actions and Commitments ([C3-014](#)) and the Outline Onshore Construction Environmental Management Plan ([C3-010](#)). The Applicant addresses harmonics only in the letter itself (see paras 3.10–3.12 below).

3.8 The Design Principles – Suffolk ([C1-191](#)) also do not appear to reflect the Applicant's answer to question 13. They still describe the converter station layout as depending on *'the supplier that has not yet been selected'* (para 3.2.7), give building heights and areas *'for illustrative purposes'* only (para 3.2.8), and provide that the designs *'will not impede the function of the equipment and the overall performance'* of the project (Table 1.1, Critical Design Constraint C.3). If the harmonics solution requires more or larger equipment, the design principles will give way to it. SEAS' position that the converter station design has not been fixed is supported, from an architectural perspective, by Mr Nicholas Bridges, a chartered architect, in his response on question 13 ([C1-241](#)).

3.9 The result is that, on the Applicant's responses to the request for information of 28 August 2026, the Secretary of State had no information from the Applicant on a matter the regulator considers *'a necessary component'* of the project delivering what it is for. The Applicant's 16 October letter (C3-002) is considered below.

The Applicant's 16 October letter

3.10 In the Applicant's 16 October letter (C3-002, pp. 26–27), the Applicant has since responded to the harmonics issue raised in C1-074. It states that the issue *'is associated with the design of equipment at Suffolk Converter Station'*, and that *'National Grid is confident that no works outside the scope of the Sea Link Development Consent*

Order project are required to achieve harmonics compliance, with compliance achieved using harmonic filter technology within the Converter Station compound’.

3.11 That is difficult to reconcile with what Ofgem records the Applicant as having told it: that *‘even with the largest filter solutions proposed by bidders... compliance with applicable harmonic limits was unlikely to be achieved’*, and that *‘NGET anticipates that additional activity is required elsewhere on the transmission network’*, which *‘may include wider reinforcement’* (Ofgem Assessment, paras 1.15–1.16). The Applicant’s 16 October letter (C3-002) does not refer to those paragraphs, does not say whether or why its position has changed since its submission to Ofgem, and provides no harmonic studies.

3.12 The Secretary of State therefore has two accounts: the regulator’s record of the Applicant’s position, and the Applicant’s later assurance. Which is correct determines whether the works fall within the assessed project (paras 4.2–4.3 below). That question can only be resolved by the evidence, which exists and can readily be obtained.

4. Why this matters in law

4.1 SEAS set out the legal framework in section 2 of [C1-074](#) and does not repeat it. Five points follow from the Applicant’s responses.

The project must be assessed as a whole

4.2 The further harmonics works are, on Ofgem’s description, part of Sea Link’s scope and *‘a necessary component’* of delivering its outputs. They are integral to the project in the sense discussed in *R (Brown) v Carlisle City Council* and *Bowen-West v Secretary of State for Communities and Local Government*. Their scope, location and likely effects are unknown. The environmental statement does not identify or assess them, and the consented parameters could not be defined to include them (*R v Rochdale Metropolitan Borough Council, ex p Milne*; *Pearce v Secretary of State for Business, Energy and Industrial Strategy*, approved in *R (Substation Action Save East Suffolk Ltd) v Secretary of State for Energy Security and Net Zero*). SEAS does not suggest the effects are necessarily significant. The point is that no one can yet say, and the Secretary of State cannot reach a lawful conclusion on likely significant effects without knowing what the works are.

A requirement would not resolve this

4.3 A requirement deferring approval of the harmonics solution would not authorise works outside the Order limits, and the effects of those works would still not have been assessed.

Duty of inquiry

4.4 The Secretary of State must take reasonable steps to acquaint themselves with the information needed to decide (*Secretary of State for Education v Tameside MBC; R (Balajigari) v Secretary of State for the Home Department*, at para 70). Here the Secretary of State asked a general question (question 58) and received no answer on this matter; the later assurance in the Applicant's 16 October letter (C3-002) is unsupported by studies and does not address what Ofgem records (paras 3.10–3.12 above). The regulator has published the issue, and the information exists: Ofgem refers to harmonic studies already undertaken on the project and to further studies the Applicant is carrying out (Ofgem Assessment, paras 1.15–1.16). It can be obtained by a further request, and the timetable can be extended to allow it.

A material consideration

4.5 Whether the project can deliver the capacity for which it is being consented goes to the heart of the section 104 balance. In SEAS' submission it cannot lawfully be left out of account. How much weight it carries is for the Secretary of State, but only once they have the information.

Cost and the planning balance

4.6 The same applies to cost. SEAS is not aware that the Examining Authority had the cost the Applicant put to Ofgem in January 2026 (see section 7 below). The section 104(7) balance, and the requirement in NPS EN-1 that network proposals be efficient and economical, must be applied on current information. That is a further reason for the Secretary of State to obtain it before deciding.

5. Questions 50 and 55: Kiln Lane

5.1 In answer to question 50, the Applicant has updated the list of environmental documents in Schedule 19 (Certified Documents) of the draft Order. None of those documents can describe or assess the further harmonics works, because, on Ofgem's account, those works have not yet been identified.

5.2 The Applicant's answer to question 55 confirms that Work No. 1B, the Friston (Kiln Lane) substation where Sea Link connects to the network, *'is to be constructed and operated pursuant to the East Anglia TWO Offshore Wind Farm Order 2022'*, and that its operational noise is controlled by Requirement 27 of that Order, which *'imposes a combined noise rating level'* for Kiln Lane and the East Anglia ONE North and East Anglia TWO substations.

5.3 Ofgem says the location of the further works is not yet known. If any were needed at or near Kiln Lane, they might be said to fall within the general descriptions of Work No. 1B or Work No. 2 of the draft Order ([C1-180](#), Schedule 1; see also the Explanatory Memorandum, [C1-182](#), para 5.1.13), or be authorised under the East Anglia TWO Order or another consent. In each case they have not been identified or assessed in the Sea Link environmental statement. Further harmonic mitigation of the kind Ofgem describes, such as additional filter equipment, could also be a source of operational

noise. If any were installed at or near Kiln Lane, it is not clear which noise limit would apply: Requirement 23 of the draft Order covers only Works Nos. 3B, 9B and 11 (C1-180), while Requirement 27 of the East Anglia TWO Order imposes a combined limit for Kiln Lane and the two wind farm substations. SEAS asks the Secretary of State to establish where the works will be, under what consent, and what noise controls would apply to them.

Cumulative effects

5.4 More broadly, in responding to Suffolk County Council the Applicant accepts that 'the nature of potential significant cumulative health and wellbeing effects also means that if they occur, the Applicant may have little or no ability to mitigate those effects', particularly 'where the majority of the impact may be caused by another project, such as Sizewell C', and on that basis declines stronger commitments on assessment and reporting (C3-002, p. 25). That reinforces the point SEAS made in C1-074 (paras 2.2 and 5.1): the cumulative effects of the concurrent East Suffolk projects have not been assessed on an integrated basis. Effects that the Applicant accepts may be significant and that it may be unable to mitigate must be weighed in the section 104 balance.

6. Question 39: Benhall Railway Bridge

6.1 Question 39 asked whether a structural survey of Benhall railway bridge, which the Applicant plans to use for heavy goods vehicles and abnormal indivisible loads, had been completed, and if so to submit it. The Applicant's answer shows it has not. The Approval in Principle has been with Suffolk County Council since 1 September 2026 awaiting sign-off, and only after that will a meeting be arranged to '*find a date for the survey*'.

6.2 The Applicant's change request during the examination identified two options, a temporary 'mini-bridge' installed on about 15 occasions or 'minor works to fix the bridge', and assessed the associated road closures ([Application Document 9.76.5, EN020026-001634](#), Change Request: Addendum to Volume 6 Environmental Statement, paras 2.5.5–2.5.7; Register of Environmental Actions and Commitments, [C1-215](#), TT11–TT12). But it accepted that '*further study would be required to define any remedial works*' (para 2.5.7), and Suffolk County Council had expressed '*significant concerns over the feasibility of constructing an overbridge*' (para 2.5.3). Until the survey is done, it is not known which option is feasible, or whether more than minor works will be needed. Like the harmonics works, this is an element on which delivery depends that remains unresolved at the point of decision. SEAS asks that the survey and its conclusions be obtained before determination.

7. Cost: what the Applicant had put to Ofgem during the examination

7.1 The Applicant's need case gave the capital cost of its chosen option as £1.154bn ([APP-320](#), Table 11.1). By January 2026 (Ofgem Assessment, para 1.14), while the examination was open, the Applicant had asked Ofgem for more than double that in real terms:

Figure	2018/19 prices	2023/24 prices	Source
Capital cost in the Applicant's need case March 2025	£1.154bn (base-year prices*)	–	APP-320, Table 11.1
Applicant's request to Ofgem January 2026	£2.567bn	£3.197bn	Ofgem Assessment, executive summary
Ofgem's proposed allowance 1 September 2026	£2.322bn	£2.892bn	Ofgem Assessment, executive summary

*APP-320 gives its unit costs in financial year 2020/21 prices (Appendix D); the Applicant has elsewhere described the £1.154bn figure as being in 2018/19 prices. On either basis the request to Ofgem is more than double.

7.2 Ofgem's proposed allowance is not a ceiling. Ofgem proposes that further costs be considered later through its ASTI Uncertain Cost Reopener, for which no cap has yet been set: contract price adjustments, the Richborough–Canterbury overhead line works, currency hedging, archaeology and unexploded ordnance (Ofgem Assessment, paras 3.53–3.56), together with biodiversity net gain (para 3.32). Further acceleration measures would also be eligible, up to a cap requested by the Applicant, but the amount is redacted in the published consultation (para 3.88). In addition, Ofgem's proposed £305.5m reduction to the Applicant's request (executive summary and Table 1) is not wholly a saving: the costs sought for archaeology (£51.7m) and unexploded ordnance (£27.9m) are removed from the allowance only to be made eligible for later recovery through the reopener (paras 3.66 and 3.71). The Applicant has also sought recovery of the costs of unwinding currency hedges if the project is cancelled (para 2.29). The harmonics works are to be funded through '*alternative funding mechanisms*' (para 1.16) and are not in these figures at all. Consumer exposure is therefore likely to exceed £3bn. These costs are recovered through network charges, and if the project were cancelled Ofgem has proposed to fund an '*appropriate level*' of the Applicant's cancellation costs, subject to an efficiency assessment ([Ofgem early construction funding consultation](#) of 24 July 2025, paras 2.37–2.38; Ofgem Funding Decision, para 3.42).

7.3 At Deadline 5, SEAS asked the Applicant to confirm whether a series of project changes made since the original estimate had been costed ([REP5-147](#)). SEAS is not aware of any response ([REP7-292](#), para 15). By then the Applicant had already submitted its £3.197bn request to Ofgem. Nor was any of this mentioned in the Applicant's answer to question 58. It bears directly on whether the project is economical and efficient, as NPS EN-1 requires, and on the section 104(7) balance. SEAS made submissions on both during the examination ([REP4-156](#), [REP5-147](#)) and in [C1-074](#) (paras 3.13–3.21). The Applicant's 16 October letter (C3-002) asserts that the harmonics issue does not raise any new issues of '*need, economy and efficiency*' that were not already the subject of submissions during the examination (p. 27). But the harmonics issue was not raised during the examination; its costs are to be met through '*alternative funding mechanisms*' outside the figures in this section (Ofgem Assessment, para 1.16); and Ofgem states that any resulting derating would mean the project's outputs '*not being achieved*' (para 1.12). Nor does the letter mention the £3.197bn the Applicant had put to Ofgem in January 2026, which was not before the Examining Authority.

8. Need and benefit: SEAS' position

SEAS' case on need and the lower-cost alternative is on the examination record (REP4-156; REP6-256A; REP7-292) and is not repeated. SEAS addresses need here only so far as it is affected by material disclosed since the examination closed: the harmonics issue, cost figures and target date in Ofgem's minded-to consultation (the Ofgem Assessment), and the NAO Report. SEAS also refers to the Ofgem Funding Decision, which bears on how that material should be read.

The need the project was sized for

8.1 [APP-320](#) sized the project to provide '*circa 2000 MW (i.e. greater than 1,800 MW) between Sizewell and the SC2 Boundary, resolving the Sizewell need*' (para 3.8.2), the Sizewell need then being a 1,852MW deficit. It did so using generation data from '*the NESO TEC registers as of 07/01/25*', which still listed Nautilus, a 1,400MW interconnector, with a 1,500MW connection agreement at Leiston/Sizewell (Table 3.2; [REP5-142](#), para 3.1.1). The Applicant has since accepted that '*the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW*' ([REP5-142](#), para 2.1.4).

8.2 *The question for the Secretary of State is therefore whether an asset whose ability to operate at its 2GW rating depends on further works not yet identified (Ofgem Assessment, paras 1.12 and 1.16), and whose consumer cost is now likely to exceed £3bn, can be justified by a residual need which, on SEAS' evidence, arises only in the late 2030s, and only if an unconsented interconnector (LionLink) being developed by the Applicant's sister company is operational* ([REP6-256A](#), para 5.3).

8.3 The Applicant also relies on the SC2 boundary in Kent, but on its own figures that is '*the transfer required by 2037 following the closure of Dungeness Nuclear Power*

Station’ (APP-320, para 3.7.21). SEAS’ evidence is that, under the worst-case fault on which the Applicant relies, Sea Link would meet only 2,000MW of the 6,516MW SC2 deficit and so would not secure NETS SQSS compliance, whereas a new Canterbury North–Kemsley line would meet it in full ([REP4-207](#); [REP5-206](#)). The Applicant has calculated deficits across the EC5 and LE1 boundaries (APP-320, Table 3.3; REP5-142, paras 3.3.3 and 3.6.2), but has not quantified how much of either Sea Link would resolve, saying only that it *‘contributes to the resolution of deficits’* ([REP5-142](#), para 3.6.6; [REP6-256A](#), paras 6.3 and 6.5). In contrast, SEAS’ evidence is that, with Nautilus removed and the planned reinforcements the Applicant omitted correctly included, there is no deficit across either boundary ([REP6-256A](#), paras 7.4.1–7.4.5).

The benefit figure no longer applies

8.4 The only quantified consumer benefit put forward for Sea Link is NESO’s figure of £1.1–1.4bn. [NESO’s Clean Power 2030 Annex 2](#) gives it in a table titled *‘Impact of key projects for delivery in 2031 if not accelerated’*, which shows Sea Link as *‘Planned for 2031’* (Table 1). The figure represents the constraint cost of a one-year delay in 2030, which Ofgem describes as arising *‘in that year alone’* (Ofgem Funding Decision, para 3.45), not Sea Link’s lifetime value. Sea Link’s regulatory target delivery date is December 2031 (Ofgem Assessment, executive summary), and the NAO found *‘no significant acceleration’* of the projects NESO said should be accelerated (Key Finding 15). Based on the regulator’s own target date, the claimed 2030 benefit would not be realised, yet Ofgem continues to cite it in support of further acceleration funding (Ofgem Assessment, executive summary and paras 3.85–3.88). It was never an assessment of Sea Link’s value against alternatives. In addition:

- the estimate assumes that *‘all planned renewable generation is added to the grid under the Clean Power 2030 plan regardless of whether the grid is ready to accommodate it’* (NAO Report, Key Finding 10); and
- in November 2025 NESO confirmed to Ofgem that its analysis *‘remains as reported in the CP2030 report’* (Ofgem Funding Decision, para 3.45), confirming that it has not been updated since November 2024.

8.5 The same paragraph of the Ofgem Funding Decision records NESO as saying that *‘Nautilus was not included in the assessment, and these constraint costs are based on connections with other projects in the area’*. NESO has not published or explained that statement. Nor does its published material allow it to be checked. NESO records that its interconnector assumptions, including *‘project sequencing’*, were taken from its Future Energy Scenarios 2024, based on *‘analysis and stakeholder research conducted during Q1 of 2024’*, and that *‘there are other projects in the pipeline that haven’t been assumed in our modelling’* ([Clean Power 2030 Assumptions](#), Electricity Supply Mix). NESO publishes totals only. These add no interconnector capacity in 2027, when Nautilus was contracted to connect at Leiston/Sizewell (APP-320, Table 3.2), 1.4GW in 2028 and 0.75GW in 2030 ([FES 2024 Data Workbook](#), sheet ES.19). It is not clear whether Nautilus was modelled at Leiston/Sizewell, at the Isle of Grain or not at all, or which

‘other projects’ underpin the estimate. This matters because the Applicant’s own need case, by contrast, counts Nautilus at Leiston/Sizewell (para 8.1 above). NESO should be asked to clarify this (request 9.1(b) below).

No independent test of need or alternatives

8.6 The NAO found that grid upgrades *‘are not supported by a full business case, options appraisal, or assessment of overall value for money’* (Key Finding 18), and that Ofgem’s ASTI framework *‘removes an Ofgem assessment of the strategic need for a project on the basis that NESO has already identified it as necessary’* (para 3.13). NESO told the NAO that it *‘does not recalculate constraint costs for each delay because of the resources that this would require and because it judged that updated estimates were not necessary to support planning decisions’* (para 2.8). In setting out its interconnector assumptions, NESO itself records that its analysis *‘does not provide project level recommendations’* (Clean Power 2030 Assumptions, Electricity Supply Mix). Whatever the position across the wider portfolio, the relocation of Nautilus, a 1,400MW interconnector, and with it a 1,500MW connection (see para 8.1 above), away from the project’s own connection point is not a routine delay. Ofgem treated the needs case as outside the scope of its funding decision and, although its own decision on Nautilus in November 2024 had proceeded on the basis that Nautilus would connect at the Isle of Grain, relied on NESO’s confirmation that its analysis *‘remains as reported in the CP2030 report’* (Ofgem Funding Decision, paras 3.43–3.47; Ofgem, Update letter on Nautilus reconsultation, November 2024). The Secretary of State is therefore the decision-maker now in a position to require that analysis before consent is granted.

The alternative on the record

8.7 SEAS’ alternative, a new Sizewell–Bramford double circuit and a new Canterbury North–Kemsley line costed at under £300m using the latest IET benchmarks ([IET Report, April 2025](#)), is already on the examination record ([REP4-156](#) Appendix A; [REP4-207](#); [REP6-256A](#) section 7; [REP7-292](#)), as is SEAS’ answer on timescale ([REP6-256A](#) para 7.7; [REP7-292](#) para 11). With Sea Link’s target date now December 2031 and consumer exposure likely to exceed £3bn, the cost difference is of the order of £2.9bn. The Applicant’s options appraisal compared options on indicative costs, on the basis that final costs would exceed those estimates but that *‘all options would incur these increases proportional to initial estimate’* (APP-320, para 5.1.14). That assumption can no longer be relied on. Sea Link’s cost has more than doubled (section 7), and the harmonics issue arises from its HVDC converter stations, with further works to be funded outside those figures (Ofgem Assessment, paras 1.15–1.16). SEAS’ alternative uses 400kV AC overhead lines, involves no converter stations, and would not raise the converter-related harmonics issue Ofgem describes. The Applicant itself accepts that transmission owners are *‘required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design’* ([REP5-142](#), para 3.1.5, quoting NPS EN-5, para 2.8.4). SEAS submits that the Secretary of State cannot responsibly treat that requirement as met while the lower-cost

alternative remains untested. SEAS asks that the alternative be independently appraised against Sea Link on cost, deliverability, timing and environmental effects before a decision is made.

9. Requests to the Secretary of State

9.1 SEAS respectfully asks the Secretary of State, before determining the application, to require:

(a) from the Applicant, to establish whether Sea Link can deliver its intended capacity, the publication of the harmonic studies; the scope, location and likely environmental effects of the further works Ofgem describes; the consent route by which those works would be authorised; and an explanation of how the Applicant's 16 October letter (C3-002) is reconciled with paras 1.15–1.16 of the Ofgem Assessment;

(b) from NESO, to establish whether the claimed need and benefits remain valid, confirmation of the generation and interconnector background behind the £1.1–1.4bn figure (including whether and where Nautilus was modelled, and the date of the data used); identification of the '*other projects in the area*' on which those constraint costs are based; and its current assessment of transfers and capability across the EC5, LE1 and SC2 boundaries in 2030–31 and the mid-2030s, with and without Sea Link;

(c) commissioned by the Department (DESNZ), to establish whether Sea Link is an economical and efficient solution, an independent comparative assessment of Sea Link against the SEAS alternative, carried out independently of the Applicant and its affiliated companies and covering capital cost, whole-life consumer cost, deliverability, timing and environmental effects; and

(d) from the Applicant, to establish whether the proposed construction access is feasible, the completion and publication of the Benhall railway bridge structural survey and its conclusions.

9.2 The Examining Authority's report was received on 30 July 2026, so the statutory period for decision ends shortly after the close of these comments. *SEAS asks the Secretary of State to extend the timetable under section 107(3) of the Planning Act 2008* so that this information can be obtained and the parties given the opportunity to comment on it. This is all the more necessary because the Applicant's 16 October letter (C3-002), published on 19 October 2026, sets out a new position on harmonics which Interested Parties have had little opportunity to examine. A short extension would not prejudice delivery: on the Applicant's own figures the SC2 transfer is required by 2037 (APP-320, para 3.7.21), and on SEAS' evidence the residual Sizewell need arises only in the late 2030s (REP6-256A, para 5.3).

9.3 SEAS respectfully submits that a decision to grant consent on the present record would be open to legal challenge, for the reasons set out in section 4:

(a) the environmental information would not cover works which the regulator treats as a necessary part of the project (paras 4.2–4.3);

(b) the Secretary of State would not have inquired into a matter which the regulator has identified as going to whether the project can deliver its purpose, although the information is readily obtainable (para 4.4); and

(c) the planning balance would have been struck without the project's current cost (para 4.6 and section 7).

9.4 Obtaining the information, and extending the timetable to do so, is in SEAS' submission the course least open to challenge.

Respectfully submitted,

Suffolk Energy Action Solutions (SEAS)

AI Disclosure: This submission has been prepared and verified by SEAS. In preparing its evidence, SEAS in some instances utilises AI tools (ChatGPT, Google Gemini, Microsoft Co-Pilot and Claude) for the summarisation of documents and for organisational assistance. The final content has been reviewed and approved by SEAS, which takes full responsibility for its accuracy.