



**Transboundary screening undertaken by the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) for the purposes of Regulation 32 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations)**

<b>Project name:</b>	Sea Link
<b>Address/Location:</b>	The Proposed Development is an electrical transmission reinforcement project, comprising a High Voltage Direct Current (HVDC) Link and associated infrastructure, between the proposed Friston substation in Suffolk in the east of England and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent, South East England. The link between these two English counties would be located in the marine environment, wholly within English Territorial Waters.
<b>Planning Inspectorate Ref:</b>	EN020026
<b>Date(s) screening undertaken:</b>	First screening – 31 July 2023 following the Applicant's request for a scoping opinion. Second screening – 15 May 2025 following acceptance of the development consent order (DCO) application.

## FIRST TRANSBOUNDARY SCREENING

<b>Document(s) used for transboundary Screening:</b>	SEA Link Environmental Impact Assessment Scoping Report ('the Scoping Report') October 2022
<b>Screening Criteria:</b>	<b>The Inspectorate's Comments:</b>
<b>Characteristics of the Development</b>	<p>The Proposed Development is an electrical transmission reinforcement project comprising a High Voltage Direct Current (HVDC) Link and associated infrastructure. The cable link would be approximately 130-140km in length. The Proposed Development is described in the Scoping Report in three geographical parts: the 'Suffolk Onshore Scheme'; 'Kent Onshore Scheme'; and the 'Offshore Scheme'.</p> <p><b>Physical Characteristics</b></p> <p>The key characteristics of the Proposed Development are described by geographical part (or 'scheme') below.</p> <p><u>Suffolk Onshore Scheme</u></p> <ul style="list-style-type: none"><li>• An extension to the proposed Friston Substation</li></ul>

	<ul style="list-style-type: none"> <li>• Underground High Voltage Alternate Current (HVAC) connection from the proposed Friston substation to the proposed converter station site</li> <li>• A new converter station</li> <li>• An HVDC underground cable from the new converter station to a landfall</li> </ul> <p><u>Kent Onshore Scheme</u></p> <ul style="list-style-type: none"> <li>• HVAC connection, either by overhead line or underground cable, from the existing Richborough to Canterbury 400kV overhead line to a converter station site</li> <li>• A new converter station</li> <li>• A HVDC underground cable from the new converter station to a landfall in Pegwell Bay</li> </ul> <p><u>Offshore Scheme</u></p> <ul style="list-style-type: none"> <li>• Suffolk Landfall: An area where the cable route transitions between the marine and terrestrial environment in Suffolk. This is located between Aldeburgh and Thorpeness, with an alternative landfall currently also under consideration at Sizewell gap</li> <li>• Kent Landfall: area where the cable route transitions between the marine and terrestrial environment in Kent, located in the Pegwell Bay area</li> <li>• An HVDC marine cable: a marine cable from the landfall in Suffolk (up to Mean High Water Springs (MHWS)) to the landfall in Kent (up to MHWS), approximately 120-128km in length and located entirely within UK territorial waters</li> </ul> <p><b>Duration</b></p> <p>The Scoping Report indicates a four-year construction programme for the Proposed Development, with construction expected to commence in 2026 and be completed by 2030.</p>
<p><b>Location of Development (including existing use) and Geographical area</b></p>	<p>All onshore elements of the Proposed Development would be located in the east and south-east of England. The offshore scheme would be in UK territorial waters. Figure 1.1.1 of the Scoping Report (Part 7) presents the 'scoping boundary' for the Proposed Development.</p> <p>The Suffolk Onshore Scheme is in a predominantly rural area. The settlements of Aldeburgh, Friston, Saxmundham, Leiston, and Knodishall Common are adjacent to the scoping boundary of the Proposed Development. The Sizewell Nuclear Site is located to the north. There are two existing 400kV overhead lines that cross the scoping boundary. There are also areas of nature conservation and landscape value within the scoping boundary (see Environmental Importance below).</p> <p>The Kent Onshore Scheme is located in a predominantly semi-rural area. Land use at the coast includes golf courses and areas of nature conservation. The settlement of Cliffs End is adjacent to the north of the scoping boundary and the settlement of Minster is</p>

	<p>approximately 350m from the scoping boundary. Richborough Energy Park and a wastewater treatment works are adjacent to the south of the scoping boundary.</p> <p>The Offshore Scheme is located wholly within English territorial waters. The Proposed Development crosses Suffolk Coastal Waters, East Anglian Shipping Waters, Eastern English Channel Approaches and the Goodwin Sands and North Dover Strait Marine Character Areas (MCA). The Scoping Report identifies several offshore wind farms (OWF) located outside the scoping boundary of the Proposed Development, including The London Array OWF to the east, and Thanet, Greater Gabbard and Galloper OWFs to the west.</p> <p><b>Distance to European Economic Area (EEA) States</b></p> <p>The Scoping Report identifies that France is the nearest EEA State to the Proposed Development. The Exclusive Economic Zone (EEZ) boundary of France is located approximately 25km from the scoping boundary.</p>
<p><b>Environmental Importance</b></p>	<p><b>Onshore</b></p> <p><u>Suffolk Onshore Scheme</u></p> <p>The scoping boundary of the Proposed Development includes parts of the Suffolk Coasts and Heath Area of Outstanding Natural Beauty (AONB) and Sandlings Special Protection Area (SPA). Parts of the Leiston Aldeburgh and Sizewell Marshes Sites of Special Scientific Interest (SSSI) are also located within the scoping boundary, together with part of the Royal Society for the Protection of Birds (RSPB) North Warren reserve and two areas of Ancient Woodland.</p> <p><u>Kent Onshore Scheme</u></p> <p>Parts of the Thanet Coast and Sandwich Bay Ramsar and SPA are located within the scoping boundary, in addition to parts of the Sandwich Bay Special Area of Conservation (SAC), Sandwich Bay to Hacklinge Marshes SSSI and Sandwich and Pegwell Bay National Nature Reserve (NNR).</p> <p><u>Summary</u></p> <p>No potential receptors of environmental importance have been identified in the onshore environment that could result in transboundary impacts. Onshore receptors and impacts are therefore not discussed further in this screening.</p> <p><b>Offshore</b></p> <p>A number of designated sites are partially within the scoping boundary including the Outer Thames Estuary SPA, Thanet Coast and Sandwich Bay SPA and Ramsar, Southern North Sea SAC, Sandwich Bay SAC, Leiston Aldeburgh and Sandwich Bay to Hacklinge Marshes SSSI, and Goodwin Sands Marine Conservation Zone (MCZ).</p>

The Scoping Report at Appendix 2 (Part 6 Appendices) describes receptors of environmental importance located within the UK and does not identify any potential receptors within EEA States. It is noted that the Scoping Report does, however, within Part 4 Offshore include reference to potential receptors in EEA States within the following offshore aspect chapters:

- Marine mammals
- Commercial fisheries
- Other Sea Users
- Cumulative impacts

These are expanded on below with the exception of cumulative impacts, which are described separately in the 'Cumulative impacts' section of this transboundary screening.

## **Offshore**

### Marine Mammals

The marine mammal species likely to be present in the scoping boundary are outlined in Chapter 4.5 of the Scoping Report (Part 4 Offshore). These have been identified from desk-based studies. The Scoping Report states that of the cetacean species found in UK waters, harbour porpoise occurs in the highest numbers within the study area. Bottlenose dolphin, minke whale, white-beaked dolphin were identified as commonly occurring or resident UK cetacean species but are found in low density in the study area. The Offshore Scheme passes through the Southern North Sea SAC designated for harbour porpoise. The Scoping Report also confirms that grey seal and harbour seal are known to haul-out at a number of locations in proximity to the Proposed Development.

The Scoping Report identifies two European sites within the UK (the Southern North Sea SAC and the Wash and North Norfolk Coast SAC) and eight European sites designated for marine mammals within EEA States that are considered in its initial screening of designated sites within 135km from the Proposed Development. These are identified in Table 4.5.2 of the Scoping Report (Part 4 Offshore Scheme).

### Commercial Fisheries

The Scoping Report describes landed catches by UK vessel from the International Council for the Exploration of the Sea (ICES) rectangles 31F1, 32F1, and 33F1 in the period 2016 to 2020. It states that vessels from the Netherlands and Belgium also landed catches in ICES rectangles 33F1, 33F2 and 31F1. Information on commercial fish and shellfish likely to be present in the study area is included in the 'Fish and Shellfish' aspect chapter of the Scoping Report.

### Other Sea Users

The Scoping Report identifies other marine users around the Proposed Development including:

	<ul style="list-style-type: none"> <li>• Marine tourism and recreation (including recreational boating, recreational fishing, bathing areas, diving areas)</li> <li>• Offshore infrastructure <ul style="list-style-type: none"> <li>○ Offshore wave and tidal projects</li> <li>○ OWFs (four operational, five in pre-planning, consented or under construction)</li> <li>○ Mineral and aggregate extraction</li> <li>○ Dredging and disposal sites</li> <li>○ Military areas (Navy Practice and Exercise Areas (PEXA))</li> <li>○ Pipeline and cable crossings</li> <li>○ Aquaculture (Shellfish waters)</li> </ul> </li> </ul> <p>Of the other sea users identified in the Scoping Report, two active interconnectors and two proposed interconnectors between the UK and EEA States have been identified as being crossed by the Proposed Development. These are shown on Figure 4.10.1 of the Scoping Report (Part 7 Figures).</p>
<p><b>Potential impacts and Carrier</b></p>	<p>Appendix A to the Scoping Report identifies that the pathways by which impacts could be spread are via air, water and land, but goes on to state that none of the impacts identified associated with the Proposed Development are anticipated to extend across the boundary of another jurisdiction.</p> <p>Potential impacts considered in those offshore aspects of the Scoping Report that include reference to potential receptors in EEA States are as follows:</p> <p><b>Offshore:</b></p> <p><u>Marine mammals</u></p> <ul style="list-style-type: none"> <li>• Underwater sound impacts</li> <li>• Potential increase in suspended/deposited sediments</li> <li>• Airbourne sound and visual disturbance</li> <li>• Subsea cable thermal emissions</li> <li>• Electromagnetic field (EMF) emissions</li> <li>• Collision with project vehicles</li> <li>• Indirect effects due to impacts on prey species</li> </ul> <p><u>Commercial fisheries</u></p> <ul style="list-style-type: none"> <li>• Obstruction of navigation to commercial fishing grounds</li> <li>• Displacement of commercial fishing activities</li> <li>• Direct loss or damage of fishing grounds</li> <li>• Loss or damage to fishing gear</li> <li>• Indirect effects to commercial fisheries as a result of impacts on the ecology of commercial species</li> </ul> <p><u>Other Sea Users</u></p> <ul style="list-style-type: none"> <li>• Vessel interaction with stationary or slow-moving traffic</li> <li>• Occupancy of seabed</li> <li>• Installation/removal of infrastructure could interfere/displace other sea users</li> </ul>

<p><b>Extent</b></p>	<p>Appendix 2 to the Scoping Report states that the extent of the impacts will vary for different EIA aspects; however, no significant effects are anticipated that could impact on EEA States.</p> <p>With regards to Marine Mammals, it is noted that the Applicant has undertaken an initial screening for potential impacts to European sites designated for marine mammal features, which is based on the likely zone of influence from the Proposed Development and distance to European sites due to the mobile nature of the species (see Scoping Report Chapter 4.5 of Part 4 Offshore Scheme). Initial screening distances have been identified through consideration of underwater noise propagation, connectivity between European sites and the Proposed Development, and maximum foraging/travel distances of species.</p> <p>As noted above, two European sites within the UK (the Southern North Sea SAC and the Wash and North Norfolk Coast SAC) and eight European sites designated for marine mammals within EEA States are considered in the Applicant's initial screening of designated sites within 135km from the Proposed Development. These are identified in Table 4.5.2 of the Scoping Report (Part 4 Offshore Scheme) and include one SAC in Belgium (Vlaamse Banken SAC), three SACs in the Netherlands (Vlakte van de Raan SAC, Voordelta SAC, and Grevelingen SAC) and four SACs in France (Bancs des Flandres SAC, Ridens et Dunes Hydrauliques du Détroit du Pas-de-Calais SAC, Baie de Canche et Couloir des Trois Estuaires SAC, and Estuaires et Littoral Picards (Baies de Somme et d'Authie) SAC). These are also shown on Figure 4.5.1 of the Scoping Report (Part 7 Figures).</p> <p>With regards to Other Sea Users, the four interconnectors identified in the Scoping Report (Part 4 Offshore Scheme) include the active Nemo Link interconnector between the UK and Belgium and the active BritNed interconnector between the UK and the Netherlands. Together with the proposed Gridlink interconnector between the UK and France, and the proposed NeuConnect interconnector between the UK and Germany. The latter interconnector is not explicitly described in the 'Other Sea Users' chapter of the Scoping Report but is described in Scoping Report Section 4.1 'Evolution of the Offshore Scheme' and identified in the Cumulative impacts chapter.</p>
<p><b>Magnitude</b></p>	<p>Appendix 2 to the Scoping Report states that the magnitude of change will vary for different EIA aspects; however, none of the anticipated effects are likely to occur at a magnitude that would impact an EEA State.</p> <p>With regards to the three aspect areas considered above, no information is currently available on the magnitude, of any potential transboundary impacts.</p>
<p><b>Probability</b></p>	<p>Appendix 2 to the Scoping Report states that it is very unlikely that effects from the Proposed Development would impact on an</p>



	<p>EEA State during both normal conditions and exceptional situations such as accidents.</p> <p>With regards to the three aspect areas considered above, no information is currently available on the probability of any potential transboundary impacts.</p>
<b>Duration</b>	<p>Appendix 2 to the Scoping Report states that no significant effects are anticipated that could impact on an EEA State.</p> <p>With regards to the three aspect areas considered above, no information is currently available on the duration of any potential transboundary impacts.</p>
<b>Frequency</b>	<p>Appendix 2 to the Scoping Report states that no significant effects are anticipated that could impact on an EEA State.</p> <p>With regards to the three aspect areas considered above, no information is currently available on the frequency of any potential transboundary impacts.</p>
<b>Reversibility</b>	<p>Appendix 2 to the Scoping Report states that no significant effects are anticipated that could impact on an EEA State.</p> <p>With regards to the three aspect areas considered above, no information is available on the reversibility of any potential transboundary impacts.</p>
<b>Cumulative impacts</b>	<p>The Applicant's cumulative impact assessment has not yet been undertaken and the Applicant has not identified any likely significant cumulative effects at this stage. However, a list of potential schemes to be considered in the cumulative assessment has been provided and includes several proposed interconnector schemes linked to EEA States, including:</p> <ul style="list-style-type: none"> <li>• Neuconnect – interconnector between UK to Germany</li> <li>• Gridlink - interconnector between UK to France</li> <li>• Nautilus - interconnector between UK to Belgium</li> <li>• EuroLink (recently renamed as the 'Lion Link' interconnector) - interconnector between UK to the Netherlands</li> </ul>
<p><b><u>Transboundary screening undertaken by the Inspectorate on behalf of the SoS</u></b></p> <p>Under Regulation 32 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations) and on the basis of the current information available from the Applicant, the Inspectorate is of the view that the Proposed Development <b>is likely</b> to have a significant effect on the environment in an EEA State.</p> <p>In reaching this view the Inspectorate has applied the precautionary approach (as explained in its Advice Note Twelve: Transboundary Impacts) and taken into account the information currently supplied by the Applicant.</p> <p><b><u>Action:</u></b></p> <p>Transboundary issues notification under Regulation 32 of the 2017 EIA Regulations is required. States to be notified:</p>	

- Belgium, France and the Netherlands - due to potential impacts on marine mammals and other sea users (interconnectors)
- Belgium, Germany and the Netherlands – due to potential impacts on commercial fisheries and other sea users (interconnectors)

**Date:** 31 July 2023

**Note:** The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.

## SECOND TRANSBOUNDARY SCREENING

<b>Document(s) used for transboundary Screening:</b>	Sea Link Environmental Statement (ES) and Sea Link Habitats Regulations Assessment (HRA) Report both dated March 2025.
<b>Date screening undertaken:</b>	Re-screened on 15 May 2025 following acceptance of the DCO application.

### Transboundary re-screening undertaken by the Inspectorate on behalf of the SoS

Following submission of the DCO application, the Inspectorate has reconsidered the transboundary screening decision made on 31 July 2023.

The Inspectorate has identified the following matters that differ from those considered at the time of the previous transboundary screening decision:

- provision of HRA information
- provision of transboundary assessments within relevant chapters of the ES, and consideration of cumulative effects.

### Provision of HRA information

The HRA Report states that the proposed development does not overlap with areas of devolved administrations or with those of other EEA States. It states that no other HRA-related consents will be required from different competent authorities. No European sites in EEA States are considered within the HRA.

### Provision of transboundary assessments in the relevant chapters of the ES and cumulative effects' assessment

Each offshore aspect chapter of the ES (Part 4 Marine) provides a description of transboundary effects. This includes: physical environment, benthic ecology, fish and shellfish ecology, marine mammals, marine ornithology, marine archaeology, shipping and navigation, commercial fisheries and other sea users. It is concluded that there would be no significant transboundary effects that could impact EEA states.

Regarding the 3 aspects considered in the first transboundary screening, the ES provides the following information:

- ES Part 4 Chapter 4 Marine mammals - 4 cetacean species are likely to occur in the study area (harbour porpoise, bottlenose dolphin, minke whale and white-beaked



dolphin, and grey seal and harbour seal are known to haul-out at locations in proximity to the proposed development. No likely significant effects were identified.

- ES Part 4 Chapter 8 Commercial Fisheries – the offshore component of the proposed development overlaps with 2 small areas where vessels from Belgium and France have historic fishing rights. The majority (80.07%) of observations in ICES rectangles 31F1, 32F1, and 33F1 were of UK vessels but non-UK vessels were observed, including vessels from Belgium (8.42%) and France (5.71%). Vessels from the Netherlands (5.35%) were observed in the eastern part of ICES rectangle 32F1 but did not overlap with the offshore scheme. An effect of moderate magnitude was identified for commercial vessels equipped with fixed and drift nets from temporary loss or alteration of fishing grounds during construction, operation and decommissioning but none of the non-UK vessels observed were equipped with this gear. With mitigation this would be reduced to minor and not significant. No other likely significant effects were identified.
- ES Part 4 Chapter 9 Other Sea Users - 2 active interconnectors, 1 proposed interconnector and 1 consented interconnector between the UK and EEA States were identified as being crossed by the proposed development. These are shown on ES Figure 6.4.4.9 (sheet 3). This includes: Britned (connects with the Netherlands), GridLink (connects with France), NemoLink (connects with Belgium) and Neuconnect (connects with Germany). No likely significant effects were identified.

ES Part 4 Chapter 6 Marine Archaeology states that shipwrecks, aircraft crash sites and archaeological material located within UK territorial waters that originated from other nations would be considered transboundary receptors, however no such receptors are identified within the ES. No other transboundary receptors are identified within the ES.

ES Part 4 Chapter 11 Inter-Project Cumulative Effects, table 11.2 identifies cumulative schemes shortlisted for assessment of offshore impacts, including the interconnectors listed above (aside from Britned) as well as Nautilus (connects with Belgium) and LionLink (connects with the Netherlands). The cumulative effects assessment concludes that, with the implementation of mitigation measures, there will be no significant cumulative effects from the proposed development for any aspect.

No onshore activities have been identified which could lead to effects on an EEA State.

### **Secretary of State's comments**

Under regulation 32 of the 2017 EIA Regulations and on the basis of the current information available from the applicant and Germany's response to the first transboundary screening, the Inspectorate is now of the view that the Proposed Development **is not likely** to have a significant effect on the environment in Germany, and that potential impacts to commercial fisheries in Belgium, France and the Netherlands are **not likely** to have result in significant effects. However, the Inspectorate remains of the view that the Proposed Development **is likely** to have a significant effect on the environment in Belgium, France and the Netherlands due to potential impacts on other sea users.

In reaching this view the Inspectorate has applied the precautionary approach (as explained in its Advice Page, Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process); and taken into account the information currently supplied by the applicant.

### **Action:**

Belgium requested to be involved in the transboundary consultation process when previously notified. Germany requested not to be involved in the transboundary consultation process when previously notified.

Transboundary issues consultation under Regulation 32 of the 2017 EIA Regulations is required. States to be consulted:

- Belgium

On a precautionary basis, notification letters will be re-sent to those EEA States who did not respond to the previous regulation 32 notification.

States to be notified:

- France
- The Netherlands

No new EEA States have been identified as being likely to have significant effects on their environment.

**Date:** 15 May 2025

**Note:** The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.

**Note:**

The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page, Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process, available at:

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-transboundary-impacts-and-process#transboundary-process-under-regulation-32>