



The Planning Inspectorate

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

Customer Services: 0303 444 5000
e-mail: southeastanglialink@planninginspectorate.gov.uk

The applicant
Dover District Council
East Suffolk Council
Kent County Council
Suffolk County Council
Thanet District Council
Marine Management Organisation
The Environment Agency
Natural England

Your Ref:

Our Ref: EN020026

Date: 8 July 2025

By email only

Dear Sir / Madam,

Application by National Grid Electricity Transmission (the applicant) for an Order Granting Development Consent for the Sea Link Project

The Planning Act 2008 (as amended) section 89(3)

As set out in the Rule 4 letter [\[PD-004\]](#) published on 27 May 2025, I have been appointed by the Secretary of State for Housing, Communities and Local Government to be the lead member of the Examining Authority (ExA) that will examine and make a recommendation to the Secretary of State for the Department of Energy Security and Net Zero on the Sea Link project.

Following the decision of the SoS to accept the application for examination on 23 April 2025 [\[PD-001\]](#), the ExA has decided to make a number of procedural decisions to accept additional submissions and request further information. The aim is to enable the ExA to better utilise the pre-examination stage of this process to ensure that it has as much of the information it needs as early as possible in the overall process.

These requests follow the decisions to accept notification [\[PD-001\]](#), and publication of the Section 51 Advice [\[PD-002\]](#) and Section 55 Checklist [\[PD-003\]](#) that were issued on the 23 April 2025.

Principal areas of disagreement summary statements

The ExA has noted from the Statement of Commonality [\[APP-322\]](#) that before and during the examination period the applicant intends to develop a number of statements of common ground (SoCG) together with any additional ones “requested by the ExA through the Rule 6 letter”. Whilst these documents are useful and have a place in the examination, SoCGs can often overlap and duplicate written representations (WRs) and local impact

reports (LIRs) particularly on areas of agreement or no concerns. Conversely, matters of disagreement are generally not reported in any great detail at the pre-examination stage.

The ExA considers that, in order to be able to focus the examination, it would be beneficial at an early stage in the process for the principal areas of disagreement to be identified. This need only be a summary position at the pre-examination stage and the ExA would anticipate that matters raised at this time would be expanded upon in the local authority's LIR/ WR and other parties' WRs. The ExA considers that an early identification of the principal areas of disagreement, read alongside other submissions, would assist the ExA in identifying the principal issues, provide a clear focus for the examination and the drafting of any written questions.

As a result, for both the pre-examination and examination stages, the ExA has made a procedural decision to request from each named local authority, Marine Management Organisation and the Environment Agency a principal areas of disagreement summary statement (PADSS). The ExA thanks Natural England for providing a PADSS within its combined relevant representation and written representation. The ExA requests that this should be in a table format (similar to a Scott Schedule), addressing the following concerns:

- the principal issue in question;
- a brief explanation of the concerns held by the party which they will report on in full in LIR/ WRs;
- on a without prejudice basis what, in that party's view, needs to change/ be amended/ included so as to overcome the disagreement; and
- in the opinion of that party, the likelihood of the concern being addressed during the examination stage.

For ease a sample table can be found in annex A.

The ExA requests that the PADSS are submitted by **Monday 1 September 2025**.

The ExA intends for these to be live documents which will be regularly updated throughout the examination. In due course the Rule 6 letter will set this out and the ExA will engage the relevant parties' views on this at the preliminary meeting.

Please note the PADSS will not replace SoCG but instead will sit alongside these documents. Furthermore, the ExA has made this request based on the information that has been submitted so far and may choose to request PADSS from other organisations and interested parties either during pre-examination or examination.

Bramford to Twinstead Correction Order

The Bramford to Twinstead Correction Order was published on 9 April 2025. Noting that the Sea Link draft Development Consent Order (dDCO) comprises some similar clauses to those contained within the Bramford to Twinstead made order, please ensure that the Sea Link dDCO is updated to take account of any relevant amendments or updates.

The ExA requests that a revised dDCO, incorporating these revisions, is submitted by **Thursday 24 July 2025**.

National Grid 'Friston' substation

Chapter 4 of the environmental statement [APP-045] sets out two scenarios for the proposed National Grid substation north of Friston. Under scenario one the National Grid substation would be built under the development consents granted to Scottish Power Renewables (the SPR consents). Under scenario two, the National Grid substation would be built under the application DCO. To assist the ExA in fully understanding the position regarding these scenarios please provide:

- An update on any progress towards the implementation of the SPR consented substations since the ES was completed, and the likelihood of scenario one or scenario two proceeding.
- A table detailing the 'intentional differences' (ES paragraph 4.2.6 to 4.2.9) between scenario one and two schemes including the connection to the overhead line network, ancillary works, landscaping and surface water drainage proposals.
- A figure overlaying the different scheme scenarios.
- Clarification of any differences in the design principles used for the application scheme and the SPR schemes.
- A table detailing the differences in the design parameters and mitigation measures for the schemes and how they are to be secured in the respective DCOs and how they would be secured in the application DCO.
- Visualisations with photomontages from representative viewpoints 6, 7, 8, 9, 18, 22 and 23 showing the cumulative effects of the project infrastructure together with the SPR substations.
- A figure overlaying the consented outline landscape mitigation (or equivalent) for the SPR consented substations with the outline landscape mitigation for proposed substation for this project.

The ExA requests that this information is provided by **Thursday 24 July 2025**.

Landscape and Visual representative viewpoint locations and screened zone of theoretical visibility (ZTV)

The ZTVs indicate that there are likely to be further locations (in addition to Suffolk VP18) within or very close to the northern boundary of the AONB (for example on rights of way such as E-260/003/A or E354/026/0 or the A1094) from where the proposed National Grid substation and proposed converter station would both be visible (but not the Fromus Bridge). Provide an additional photomontage visualisation from a suitable location in that area.

The ExA identified an additional representative viewpoint in Kent, to the north side of the River Stour where public right of way T36 meets TE26. An additional photomontage visualisation is required from this location.

The ExA requests that the summer photomontages are provided by **Monday 1 September 2025** and the winter photomontages are provided by **Monday 1 December 2025**.

Saxmundham converter station

The ExA requests visualisations with photomontages showing the cumulative effects of the proposed Lionlink converter station from viewpoints 1, 2, 3, 4, 5, 6, 14, 15, 16, 17, 18, 19 and 20 as well as the additional viewpoint requested above.

The ExA requests that this information is provided by **Thursday 24 July 2025**.

Air quality modelling

[\[APP-133\]](#) states that the air quality modelling methodology is based on the Emissions Factor Toolkit (EFT) v12.1 (August 2024). The Department for Environment, Food and Rural Affairs (DEFRA) published the EFT v13.1 in March 2025. Provide a sensitivity analysis for the Kent and Suffolk air quality modelling, explaining any differences to the outcome of the assessment that might arise with the new EFT. Where necessary, provide updated air quality assessments.

The ExA requests that this information is provided by **Thursday 24 July 2025**.

Similar designs of converter stations and substations

The ExA wishes to understand the physical scale, noise and vibration and lighting impacts of the proposed converter station and substation infrastructure. In order to achieve this, the ExA intends to visit similar National Grid infrastructure. The ExA therefore requests confirmation from National Grid of one or more suitable sites (ideally in Kent or Suffolk) of comparable dimensions, technology (eg gas insulated switchgear) and lighting lux levels.

The ExA requests that this information is provided by **Thursday 24 July 2025**.

Marine mammals

The ExA understands that the optimal survey period for harbour seal is in late August during the moulting period and for grey seal is during late October to early January. The ExA notes that the Pegwell Bay Seal Surveys were carried out in September, October and November and therefore missed the optimal period in August for harbour seal. Provide confirmation that the baseline is sufficiently representative of the peak abundance or provide updated survey information.

The ExA notes that JNCC updated their guidelines for minimising risks to marine mammals earlier this year. Please update your application documents to take account of the revised guidance.

The ExA requests that this information is provided by **Monday 1 September 2025**.

Land rights tracker (LRT)

The ExA notes the 'Details of Purpose for Which Compulsory acquisition and Temporary Possession Powers are Sought', 'Schedule of Negotiations with Land Interests' and 'Special Category Land Report', which form appendix A, appendix B and appendix C to the Statement of Reasons [\[APP-012\]](#).

The ExA requests that this data is presented in a database format in order that we can efficiently and effectively capture and scrutinise all of the land interests which have not been secured by finalised agreement at the start of the examination. The applicant's reporting of ongoing discussions with affected persons and others can then be tracked, updated and searched to make both the examination, and the reporting of such matters to

the Secretary of State more efficient. This element is covered in both [the April 2024 Guidance](#) and the [Inspectorate's advice](#).

With that in mind, the ExA has made a procedural decision to request that the applicant completes and maintains a land rights tracker (LRT); an example of which is included in annex B and will be sent to the applicant by the case team. In the example, the structure of the LRT would provide a comprehensive account of the status of non-agreed affected persons, with certain cells providing a restricted drop-down menu of possible responses. Open cells would only be inputted with succinct, focused wording to ensure the table is readable. Cross referencing is acceptable provided that the results can still be interpreted in a PDF version for publication after each submission. The ExA and Secretary of State would, upon receipt of regular updates and final versions of the LRT, be able to manipulate and sort the table for accurate referencing and review.

The ExA requests that a technical meeting be held between the Planning Inspectorate and the applicant to discuss the format of the LRT, with attendees present who specialise in these matters, during w/c **Monday 21 July 2025**. Please contact the case team to confirm meeting arrangements and attendees. For the avoidance of doubt, the ExA will not be present at this meeting.

Should the applicant consider that the required information for the LRT can be captured in a different and more efficient way or by using different software, it can be discussed at this meeting.

Flood risk and surface water drainage

The applicant should be aware that National Standard for Sustainable Urban Drainage was published in June 2025. The applicant is also reminded of the s51 advice issued on 25 April 2025 regarding the Flood Risk Assessment and the updated information published by the EA in March 2025. Please ensure that this information is taken into account in revised submissions on flood risk and surface water drainage.

The ExA requests that this information is submitted by **Monday 1 September 2025**.

Commercial Fisheries

The data and information sources used to inform the baselines is set out in Table 8.1 of [APP-204] and dates from 2010 to 2022. More recent data such as Monthly UK sea fisheries statistics are available. Provide confirmation that the data used to inform the baseline is sufficiently up to date, or update [APP-204] and [APP-081] to reflect up to date data.

The ExA requests that this information is provided by **Thursday 24 July 2025**.

Additional submissions

The ExA has exercised its discretion and made a procedural decision to accept the following additional submissions:

- Applicant's response to Section 51 and Section 55 Checklist Actions Update Letter and associated documents and plans received on 12 June 2025.
- Suffolk Energy Action Solutions (SEAS) document titled '12-13 Cumulative Effects' received on 24 June 2025.

- Letter from the Suffolk Wildlife Trust received on 24 June 2025.
- 'Appendix A' submitted to accompany the relevant representation of Nicholas Bridges received on 25 June 2025.

Other matters or errata

[APP-062] document 6.2.3.2, part 2 Kent, chapter 2 ecology and biodiversity reports that *Mustela lutreola* is present at the site. The ExA's understanding is that *Mustela lutreola* is the Eurasian or European mink, which is not present in the UK. Confirm whether this record is correct or, if not amend all references in application documents to American mink *Neovison vison*.

The ExA notes that grey seal rather than harbour seal is the primary reason for designation of the Berwickshire and North Northumberland Coast Special Area of Conservation (SAC). Table 4.15 of document 6.2.4.4, part 4, chapter 4 Marine Mammals [APP-077] is therefore incorrect in identifying that it was designated for harbour seal. Please update chapter 4 to reflect this and ensure that any other incorrect references/assessments are also amended.

Application Document 6.3.3.5.D Kent Generic Quantitative Risk Assessment – Part 1 of 2 [APP-172] - part of the text is corrupted with square symbols in place of some letters and figures.

The following missing appendices from document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] should be submitted:

- appendix A Site Location Plans
- appendix B BNG Baseline Habitat Plans
- appendix C Post Developments Habits Plans

Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] specifies the screening distances based on known foraging ranges for seals based on Carter et al 2022. The wrong distances have been used and the figures should be 448km for grey seals and 273km for harbour seals. An updated version of the report should be provided with the correct figures and any consequential changes to the report should be made.

Document 6.4.4.4 ES Figures Marine Mammals Figure 1 should be amended to include Humber Estuary SAC [APP-278].

Document 7.1 Planning statement appendix table C.4 Policy CSW3 Waste Reduction – states 'Further details on Construction Waste are found in **Application Document 6.1.2.1 Part 1 Description of the Proposed Project**' Should this instead be **Application Document 6.2.1.4 Part 1**?

Document 7.5.6.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] figure 5 document title should be '**Friston Substation**' not '**Friston Converter Station**'.

Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] appendix A figure is out of sequence and appears after page C2 of appendix C. An updated version of the report should be provided with the figures in the correct sequence.

The ExA has also identified the following errors in the documents, as listed above, submitted by the applicant on 12 June:

- 7.1 Planning statement – paragraph 7.2.6 on page 83 error reference source not found;
- Application Document 7.5.7.1 Figure 5 Friston Substation Outline Landscape Mitigation – Figure 5 titled 'Friston Converter Station' but should be 'Friston Substation'

The ExA requests that these issues are rectified by **Thursday 24 July 2025**.

Revised submissions

Due to the high number of errata identified to date within the applications the ExA requests that all elements are reviewed thoroughly for quality and consistency, before submission to the ExA. The applicant is also requested to provide clean and tracked changes versions of any revised documents submitted.

If you have any queries on these matters, please do not hesitate to contact our office using the contact details at the head of this letter.

Yours sincerely,

Sarah Holmes

Lead Panel Member for the Examining Authority

Annex A – Example of PADS Table

| Table 1 – Outstanding Principal Areas of Disagreement | | | |
|---|---|---|---|
| Area of Concern | Explanation | Remedy Measures | Likelihood of Resolution |
| <i>e.g. Traffic</i> | <i>e.g. Significant concerns over modelling of traffic impacts at London Road roundabout.</i> | <i>e.g. Applicant to provide additional information on modelling.</i> | <i>e.g. Yes – Applicant has indicated this will be provided at the next Deadline.</i> |

| Table 2 – Resolved Principal Areas of Disagreement | | | |
|--|--|--|-------------------------------------|
| Area of Concern | Explanation | Remedy Measures | Summary of Resolution |
| <i>e.g. Landscape and Visual</i> | <i>e.g. Significant concerns over the visual effect of Proposed Development at London Road receptor.</i> | <i>e.g. Applicant to provide additional viewpoints at this location and mitigation in the draft DCO.</i> | <i>e.g. Provided at Deadline 1.</i> |

Annex B – Example of a LRT

| | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | U | V | W | X | Y |
|----|---------------------------|-------------------|--|----------------------|----------------------------------|-------------------------|----------------|----------------------------|---------------------|----------------|----------------|-----------------------|--------------------------------|----------------------------------|---|---|---|---------------------------------|---------------------------|-------------------------|--------------------------------------|--------------------|--------------|----------------------------|---|
| | Book of Ref. Plot No. [a] | Plan Ref. No. [b] | Description of Land and Rights Requested [c] | Category 1[d] Owners | Category 1[d] Lessees or Tenants | Category 1[d] Occupiers | Category 2 [e] | Agent / Representative [f] | IP / AP Ref No. [g] | RR Ref No. [h] | WR Ref No. [i] | Other Doc Ref No. [j] | Applicant's Response Refs. [k] | Duration of Temporary Rights [l] | Special Category (Crown, Allotment, NT etc) [m] | Special Category – other information including confirmation [n] | Is the AP a SU and is the land operational? [o] | Protective Provision Status [p] | Side Agreement Status [q] | Status of objection [r] | Update for Procedural Deadline A [s] | Heads of Terms [t] | Complete [u] | Last Update (DDMMYYYY) [v] | |
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A downloadable example is also available [under Component 7 on this link](#) – use the Detailed LRT version.