



Planning Inspectorate

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The applicant

Your Ref:

By email only

Our Ref: EN020026

Date: 5 August 2025

Dear Sir / Madam,

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

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

Following the decision of the Secretary of State (SoS) to accept the application for examination on 23 April 2025 [PD-001], the Examining Authority (ExA) notified that it had made procedural decisions on 8 July 2025 [PD-005]. The applicant responded to this notification on 24 July 2025 [AS-061] and on 4 August 2025 [AS-068]. Following receipt of this, the ExA has decided to make 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.

Land rights and related matters

Land plans and works plans

The ExA notes several plots on the land plans where acquisition of land or rights is proposed and where no corresponding works are shown on the works plans. The ExA requests that the applicant provides further information on its proposals in such white areas on the works plans.

The ExA has also identified potential errors where the applicant is seeking the permanent acquisition of land or permanent rights over plots identified on the works plans for works associated with temporary uses, for example, temporary construction compounds. The ExA requests that the applicant provides further information in this regard.

Plot 1/78 is shown on Sheet 1 of the Land Plans - Suffolk [APP-019] for class 5 compulsory acquisition of rights for access but is not mentioned in the Book of Reference

(BoR) [\[APP-016\]](#) or Statement of Reasons (SoR) Appendix A [\[APP-013\]](#). The ExA requests that Plot 1/78 is examined and any errors identified and resolved.

Statement of Reasons Appendix A - Details of Purpose for Which Compulsory Acquisition and Temporary Possession Powers are Sought [\[APP-013\]](#)

This document solely covers plots within Suffolk, no Kent plots are included. The ExA requests that the applicant signposts to where an equivalent document for Kent can be found or provide such a document as a matter of urgency, no later than **Monday 11 August 2025**.

Diligent enquiry into land interests

The SoR [\[AS-014\]](#) identifies that where land was unregistered, or interests were unknown further investigations were done on site and notices placed on the land requesting information. The ExA requests that the applicant provide:

- Detail explaining what was done to identify the unregistered and unknown plots and when this work was undertaken, or signpost to where in the application this is provided.
- The current number of plots with unknown rights.
- Explanation regarding any further work that will be done to identify any unknown rights.

During the unaccompanied site inspection in Kent, the ExA identified two locations where caravans were located that appeared to be in residential use ([\[EV1-002\]](#) and [\[EV1-003\]](#)). Please provide an update on any contact had with the occupants of these caravans in relation to land interests and detail how you are ensuring they can contribute fully to the examination.

Drainage mitigation

The Suffolk County Council (SCC) [\[RR-5209\]](#) and East Suffolk Council (ESC) [\[RR-1420\]](#) relevant representations (RR) raise the concern that there is insufficient land for drainage mitigation within the order limits. In light of this concern, the ExA requests that the applicant review the mitigation proposals with regard to the submission from the councils and provide the findings of the review to the ExA. Please ensure that the comments from the Environment Agency (EA) [\[RR-1586\]](#) on Suffolk flood modelling are taken into account as part of this review.

Land Rights Tracker (LRT)

A meeting was held between the Planning Inspectorate's case team and the applicant on Thursday 24 July 2025 where the format of the LRT was discussed (a record of this meeting will be published in due course). The ExA requests that, following agreement of the final format with the case team, a fully populated version of the LRT is provided.

Statement of Reasons [\[AS-014\]](#)

Several errata have been identified within the SoR. In particular section 8, human rights and equalities, has been written in a way that implies that the examination is complete. This is a serious error which needs rectification. The ExA therefore requests that the SoR is reviewed in full and any errors identified and resolved.

National Grid Kiln Lane substation (formerly known as 'Friston' substation)

The applicant's responses [\[AS-061\]](#) (dated 24 July 2025) and [\[AS-068\]](#) (dated 4 August 2025) to the ExA's letter [\[PD-005\]](#) provide an update on discussions with Scottish Power

Renewables (SPR) regarding the options to construct the Kiln Lane substation under the SPR consent (scenario 1 as defined in ES paragraph 4.2.5 [AS-018]) or under the application Development Consent Order (DCO) (scenario 2 as defined in ES paragraph 4.2.11 [AS-018]). While the applicant's responses indicate that scenario one is the more likely, the letters do not confirm when a decision will be made on which scenario will be followed. To ensure that examination time is not wasted in considering a scenario not pursued, the ExA requests that the applicant specifies when the final decision will be made known to the examination. For the avoidance of doubt, unless the ExA receives this confirmation, both scenarios will be examined in full.

The applicant's response [AS-068] states that the additional information requested by the ExA would be provided "*at some point ahead of the start of the Examination rather than in September 2025*". In order for Interested Parties to be able to review any new information, the ExA requests that the information is provided at least two weeks in advance of the Preliminary Meeting (date to be confirmed).

Representations identifying additional submissions

A number of RR highlight matters that they consider require further assessment or justification. The ExA reviewed the representations and considers it likely that additional submissions may be required in some cases, which may take time to prepare. The ExA therefore requests early submission of detailed responses to the following representations:

Natural England [RR-3920]

Natural England has provided a substantive representation including a Principal Areas of Disagreement Summary Statement (PADSS). Amongst other things this representation identifies the absence of an In-Principle Monitoring Plan (IPMP) with the submitted documents to monitor the impacts (temporal and spatial changes) on protected species and habitats and those of conservation importance.

Suffolk County Council [RR-5209]

SCC raises a number of issues which include, for example concerns with the use of Benhall bridge (B1121) over the railway, due to its structural condition and whether it is feasible to use this bridge to transport abnormal indivisible loads for the proposed development. Furthermore, there is concern from SCC that this bridge and any works necessary for it to be used as part of a construction route is not within the order limits of the proposed development.

East Suffolk Council [RR-1420]

ESC makes specific reference to the need for additional breeding and wintering bird and hazel dormouse surveys however the ExA notes that SCC states that it "is generally content with the Applicant's suite of ecological surveys" and that "the documents have been prepared to a good, professional standard by the Applicant". The ExA requests that the applicant liaise with ESC to agree whether further surveys are required and to carry out any additional surveys necessary.

Environment Agency [RR-1586]

The EA raises various concerns including on matters where early action on further assessment or consultation appears to be necessary.

Suffolk Energy Action Solutions (SEAS) [RR-5210]

SEAS has submitted a detailed RR covering several issues including a concern that the submitted traffic assessments rely on traffic survey data collected in January and February 2024, rather than in peak summer seasons.

Kent Wildlife Trust (KWT) [RR-2980]

KWT has submitted a detailed RR covering several issues and raises various concerns including on matters where early action on further assessment or justification may be necessary.

Save Minster Marshes [RR-4893]

Save Minster Marshes has submitted a detailed RR covering several issues and raises various concerns including on matters where early action on further assessment or consultation may be necessary.

Anglian Water Services Limited [RR-0334]

Anglian Water Services Limited RR includes the concern that there are inaccuracies in the BoR [APP-016].

Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) [RR-2976]

KEIFCA's RR includes concern that there is insufficient mapping resolution of known or potential *Sabellaria spinulosa* within the route corridor to confirm reef absence or full habitat extent. KEIFCA's RR also includes concern that further consideration needs to be given to cockle fishery beds, potting and netting activities in the southern extent of the offshore scheme.

Eastern Inshore Fisheries and Conservation Authority (EIFCA) [RR-1422]

EIFCA includes concern that further consideration should be given to potting activities in the inshore areas.

Navigation Installation Plan

Schedule 16 condition 4(1)(k) of the draft DCO (dDCO) requires a 'navigation installation plan for the relevant stage which is in general accordance with the principles set out in the outline navigation installation plan'. However, no outline navigation installation plan has been provided with the application. The ExA requests that an outline navigation installation plan is produced or an explanation provided as to why this is not required.

Water Framework Directive (WFD)

The EA RR [RR-1586], includes the following matters related to the WFD where early action appears to be necessary;

- Consultation with Internal Drainage Boards on the justification for the use of culverts and their form in order to meet WFD requirements.
- Consultation with water companies on the potential need for abstraction licences and their effects on WFD objectives.
- Further consultation on, and assessment of, horizontal directional drilling (HDD) activity including assessment of the drilling muds, implications for WFD objectives for groundwater bodies and feasibility of HDD at proposed locations.

The ExA requests the applicant to provide an initial response and a timetable of proposed actions to resolve each of these matters.

Sizewell C Statutory Harbour Authority

Sizewell C Ltd [\[RR-5042\]](#) comments that Sizewell C Harbour Authority has not been consulted. If this is the case, the ExA requests that the applicant consults with the Sizewell C Statutory Harbour Authority and provides details of the outcome of any discussions.

Historic England [\[RR-2032\]](#)

For the Suffolk area, Historic England state that a final report on intrusive assessments is necessary in order to provide clarity on the significance of heritage assets and to set out appropriate mitigation. Further to the applicant's response to s51 advice [\[AS-032\]](#), the ExA requests that the applicant provide this information and any updated documents, or a timeline for when these will become available.

Surveys

The ExA has identified that some of the RR, including Natural England, the EA and other organisations, submitted to date raise concerns regarding survey information. Due to the potential seasonal restrictions associated with undertaking certain surveys the ExA requests that where these parties have requested additional survey information the applicant should either utilise the time available to undertake additional surveys or provide a programme of when they will be undertaken or explain why they are not necessary.

Additional submissions

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

- Submission from the National Trust received on 3 July 2025 [\[AS-039\]](#)
- Submission from Mr Duncan received on 20 July 2025 [\[AS-040\]](#)

Errata and related issues

In addition to the matters raised above, the ExA has identified additional errata as detailed below.

Chapter 4 version B [\[AS-018\]](#)

- Paragraph 4.2.15 is incorrectly numbered 1.1.1.

Draft Development Consent Order [\[AS-043\]](#)

- Article 13(7): Confirm if provisions should refer to paragraph (4) rather than (2).
- Article 26(3)a: Confirm if Article 36 should be referenced rather than Article 265.
- Schedule 3, Requirement 7(3): The term 'HGV' is not defined.
- Schedule 3, Requirement 7(4)g: The term 'severe weather' is not defined.
- Schedule 3, Requirement 10(3): Empty brackets.
- Schedule 3, Requirement 14(c): Typographical error - missing full stop.
- Schedule 4, paragraph 3: Should this have the heading 'Fees'?
- Schedule 15, Part 2, paragraph 9: Paragraph 23 of the Telecoms Act, 1984 has been repealed by the Digital Economy Act, 2017. Confirm correct reference.
- Schedule 16, Part 2, Condition 1, Table 2: Confirm what maximum length of cable is sought. This is currently expressed as 122196,100 km.
- Schedule 16, Part 2, Condition 10: Typographical error - 'Aldebrugh'.

Explanatory Memorandum [AS-045]

- Paragraph 4.3.4 states "... within 28 days of receiving an application for consent or approval, the consenting authority is deemed to have granted consent. The same 35 day period ...". Clarify whether it is 28 or 35 days.
- Paragraph 4.6.25 states "...equivalent provision is included in the draft A122 (Lower Thames Crossing) Development Consent Order". Lower Thames Crossing was granted consent on 25 March 2025 and therefore is no longer draft. Confirm that the final provision is equivalent.
- Paragraph 4.19.6 refers to a time limit of 28 days but Article 15(9) of the dDCO refers to 35 days. Confirm the proposed time limit and revise the dDCO or EM accordingly.
- Paragraph 5.3.12: Typographical error - 'lighting'.

Marine Mammals [AS-049]

[AS-049] 6.2.4.4 Marine Mammals Table 4.15 – Although harbour seal has been replaced with grey seal in relation to Berwickshire and North Northumberland Coast Special Area of Conservation, it still states that grey seal is a qualifying feature but not a primary reason for site selection. This is incorrect, the grey seal is the Annex II species that is a primary reason for selection of the site.

ES Appendix 3.2.B Wintering Bird Survey Report 2022-2023 [APP-148]

Paragraph 1.3.19 appears to be missing text. Please revise.

Paragraph 1.5.31: Typographical error – 'forging'.

The ExA requires that all the requests above are completed by **Monday 1 September 2025** unless otherwise specified.

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