



**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

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BY EMAIL ONLY

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**Application by National Grid Electricity Transmission (the applicant) for an Order Granting Development Consent for the Sea Link Project (Planning Inspectorate Reference EN020026)**

**Notification of Applicant's Intention to Submit Request for Proposed Changes to the Development Consent Order Application**

## 1 Introduction

### 1.1 Overview

- 1.1.1 Sea Link Project ('the Proposed Project') Development Consent Order (DCO) application was submitted by National Grid ('the Applicant') on 27 March 2025. The application was accepted for Examination on 23 April 2025. The application is currently in the Pre-Examination period.
- 1.1.2 During the Pre-Examination period, the Applicant has undertaken supplementary technical and survey work and continued engagement with stakeholders. The Applicant has also begun to review Relevant Representations submitted on the Application and has received a number of letters requesting further information from the Examining Authority (ExA) under Section 89 of the Planning Act 2008.
- 1.1.3 As a result of this ongoing work and dialogue, the Applicant is proposing to incorporate five design changes into the Proposed Project. This letter provides formal notification to the ExA that the Applicant intends to formally request these proposed changes. The Applicant requests the ExA's advice on the procedural implications of the proposed changes and the need, scale and nature of consultation to be carried out. Section 4 of this letter summarises the Applicant's proposed approach to consultation to inform this advice.



## 1.2 Nature of the Proposed Changes and Implications

- 1.2.1 The changes proposed apply to small and discrete areas of the Proposed Project and most of the Proposed Project would remain unchanged if the Change Request is accepted. The proposed changes do not affect the project description as presented in the Application or the nature of the project. The Applicant views the changes as design refinements that would deliver improvements to the design, reduce the impacts of the Proposed Project, and respond to comments from consultees.
- 1.2.2 Guidance on the procedure for making changes following submission of an application is set out in '[Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination - GOV.UK](#)' (herein referenced as 'PINS guidance (2024)'). The Applicant is of the view that the proposed changes are not substantial (individually or cumulatively) and inclusion of the changes would not result in a materially different project as referenced in the PINS guidance (2024).
- 1.2.3 The proposed changes would reduce the environmental impacts of the project and address comments from consultees. The proposed changes will individually and cumulatively reduce and simplify the issues that will need to be addressed during the Examination of the DCO application. Therefore, the Examination should not be elongated or complicated through the introduction of these proposed changes. The Applicant is of the view that these proposed changes, overall, could require less Examination time than the accepted application as it stands.
- 1.2.4 These proposed changes are not being made to address any existing technical deficiencies associated with the application submitted for Examination and as a result there should be no concerns regarding the veracity of the application submitted in March 2025.
- 1.2.5 All five proposed changes could result in minor changes to the construction and operational environmental effects reported in the Environmental Statement (ES). It is considered likely that the proposed changes will cumulatively result in fewer effects overall than the current project. Further information on the likely effects of the proposed changes will be presented in the Change Request application, although an initial summary is provided in Sections 2 and 3 of this letter.
- 1.2.6 It is not anticipated that any of the proposed changes will require an update to the Habitats Regulations Assessment.
- 1.2.7 Some of the proposed changes would involve changes to the Order limits and result in the need to compulsorily acquire additional land and secure additional rights over land. The Infrastructure Planning (Compulsory Acquisition) Regulations 2020 ("CA



Regulations") are therefore engaged and the requirement to consult under the CA Regulations has been taken into account in the programme for the changes presented in this letter.

- 1.2.8 Where applicants consider changes are necessary, the PINS guidance (2024) highlights the importance of bringing proposed changes forward as early as possible in the application process to allow sufficient time for participants in the application process to fully engage and comment upon the changes made. The Applicant is notifying the ExA of the proposed changes at the earliest opportunity and before the Rule 6 letter has been issued in line with the PINS guidance. The limited proposed changes would not be so substantial as to constitute a materially different project as discussed in the PINS guidance.
- 1.2.9 However, given that the need for the proposed changes has arisen recently, the Applicant is not likely to be able to obtain consent from all persons with an interest in the additional land prior to the Change Request and regulations 5 to 19 of the CA Regulations would therefore be engaged. The Applicant is carrying out diligent enquiries to identify and consult land interests in parallel with this notification and will complete consultation with land interests on the proposed changes. The Applicant is confident there is time for all required processes to be undertaken with no delay to the start or completion of Examination. An indicative programme for processes required under the CA Regulations is provided in Figure 1 of this letter.
- 1.2.10 The proposed changes are not likely to significantly change the compliance of the project with national and local planning policy as presented in the Planning Statement **[AS-057]**. However, the proposed changes are considered to slightly increase compliance for the reasons set out for each proposed change described in section 2 of this letter.
- 1.2.11 This remainder of this letter sets out the following details associated with the proposed changes:
  - Section 2: A description of the proposed changes and the reasons they are being proposed.
  - Section 3: A statement on whether the proposed changes are expected to result in any new or different likely significant environmental effects; including a summary description of those effects and any mitigation proposed.
  - Section 4: Proposed approach to consultation to be carried out prior to submission of the Change Request.

- Section 5: Indicative programme for the introduction of changes, including the submission deadline and timescales for procedures in regulations 5 to 19 of the CA Regulations.

## 2 Description of Proposed Changes

### 2.1 Summary Overview of Proposed Changes

2.1.1 A high-level summary of the five proposed changes proposed is set out in Table 1.

**Table 1: Overview of Proposed Changes**

Change number	Name of change and description	Works packages affected
1	<b>Change to access at the Hoverport, Kent:</b> Extension of the Order limits to re-route the access to the intertidal area from the hoverport at Pegwell Bay to avoid encroaching on the saltmarsh. The location of the saltmarsh in August 2025 surveys has changed since previous surveys necessitating the proposed change.	Part 2 – associated development
2	<b>Change to Works Plans at Friston (Kiln Lane) substation, Suffolk:</b> Extend the area for Work 1B (Friston substation) to align with the area presented for the same substation in the East Anglia One North and East Anglia Two DCOs. Also, amendment to Work 4 (Suffolk temporary work compounds) to reflect change to substation area.	1B and 4
2	<b>The Henge, Suffolk:</b> Amend the Order limits to remove the Neolithic henge feature recorded to the east of Friston (Kiln Lane) substation from the Order limits and provide additional land to enable the underground cable in this location to be relocated around the feature.	4 and 5
4	<b>Benhall Railway Bridge, Suffolk:</b> Amend the Order limits to add in Benhall Railway Bridge along the B1121 in Suffolk; and adjacent land to the east and along the railway line. This proposed change responds to requests from Suffolk County Council	New work, 3A and 3B

Change number	Name of change and description	Works affected packages
	and East Suffolk Council to provide more flexibility in the options that can be implemented to enable Abnormal Load Vehicles to cross the bridge and greater clarity over the consenting route.	
5	<b>Increase in area for maintenance of a new hedge to south of B1119:</b> Broadening of the strip of land south of the B1119 in Suffolk to accommodate the proposed new hedgerow, existing drainage, and the water main. This proposed change responds to landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting.	Part 2 associated development

2.1.2 Further detail on the proposed changes is set out within the remainder of this section. The figures in Appendix A to E show the location of the proposed changes.

### Change 1: Change to access at the Hoverport

- 2.1.3 This change proposes to extend the Order limits to widen the access to the intertidal area from the hoverport at Pegwell Bay to ensure that encroaching saltmarsh can be avoided.
- 2.1.4 In August 2025 the extent of saltmarsh was recorded further down shore than had previously been recorded and it is now encroaching on the current Order limits and the ramp access for construction, operations and maintenance (O&M) activities from the hoverport. Saltmarsh is a sensitive habitat, and the Applicant has committed to the avoidance of impacts to this habitat in Pegwell Bay through the use of trenchless techniques at the landfall. By amending the Order limits to include an additional access route to the intertidal area, the access route will also avoid the saltmarsh habitat.
- 2.1.5 The Applicant considers it unlikely that the proposed change will result in any new or different likely significant environmental effects as the area in the extended Order limits is formed of concrete and will be away from sensitive habitats i.e. saltmarsh.
- 2.1.6 The proposed change is considered to be in line with planning policies in the National Policy Statements and Local Plan to protect valuable habitats and designated sites; namely the saltmarsh and associated international designations.



2.1.7 National Grid is engaging with landowners of affected parcels to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it has not been possible to gain their consent for the proposed change in advance of this Change Request notification.

2.1.8 The proposed change to the Order limits is shown on the figure in Appendix A.

**Change 2: Change to Works Plans at Friston (Kiln Lane) substation, Suffolk**

2.1.9 This change proposes to extend the area for Work 1B (Friston (Kiln Lane) substation) to align with those consented through two Scottish Power Renewables (SPR) projects. This will either be presented as a proposed change to the limits of deviation currently presented or a proposed change to the Works area on the Proposed Project's Works Plans to align with the approach taken in the SPR Works Plans.

2.1.10 The National Grid Substation proposed at Friston as part of the Sea Link application already has consent as part of SPR East Anglia ONE North Offshore Wind Farm Order 2022 and East Anglia TWO Offshore Wind Farm Order 2022. It is anticipated that the substation will be constructed under the extant SPR consents, with the works undertaken under the Sea Link consent being connection works to that substation, and related works, but not the substation itself.

2.1.11 The Applicant recognised in the DCO application that as this scenario relies on the substation being constructed under other consents, the National Grid Substation at Friston must also be included in the Sea Link's Proposed Project Order limits and the description of development for the Proposed Project in order that consent is included in the Sea Link DCO to deliver the substation in the event that it is not delivered under the SPR consents. This scenario is considered unlikely to occur but has been included to demonstrate and ensure deliverability of the Sea Link project. The approach means that there are two scenarios for development of the substation at Friston, both of which must be examined as part of the Sea Link Examination.

2.1.12 When SPR was submitting its wind farm applications it was not known whether Friston substation would include Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS). An AIS substation requires a larger footprint than a GIS substation so the area for Friston substation in the SPR applications was relatively large. By March 2025 when the Sea Link application was being submitted, National Grid had taken the decision to proceed with the GIS substation. As a result, the area for this substation in the Sea Link application and the limits of deviation around it were smaller in the Sea Link application than the SPR applications.

2.1.13 The detailed design of the Friston (Kiln Lane) substation has progressed under the SPR consents and the proposed location is within the works area for the SPR consents, but outside those for the Sea Link application. This only became clear when draft information produced to discharge requirements for the SPR consent was shared with the Sea Link team in June 2025.

2.1.14 The Applicant considers that the discrepancy between the two sets of plans should not be an issue because:

- If Friston substation is constructed under the SPR consents (Scenario 1) National Grid would not enact this part of the Sea Link consent and there remains significant flexibility within the Sea Link Order limits for the cables to connect to the new location (which is very close to the Sea Link limits of deviation (LoD)); and
- if the substation is constructed under the Sea Link DCO (Scenario 2) it could instead be constructed in the location shown by the current Friston substation LoD in the Sea Link Works Plans.

2.1.15 However, the different locations are making it challenging for SPR and National Grid to develop consistent plans showing, for example, landscaping and drainage around the substation. Key stakeholders have emphasised strongly in Relevant Representations and informal discussions that there is a need for consistent plans to reassure local people that National Grid is not aiming to produce a different design to that being progressed by SPR. Consistent plans would also reduce the complexity of plans for the site to aid their interpretation; something that has been raised by key stakeholders and is apparent in questions asked by the ExA in Section 89 letters issued to the Applicant following submission of the application. The Applicant is sympathetic to concerns raised, which can be addressed if the area for the substation is made consistent between the applications. This reduction in complexity will also help the Examining Authority examine the two scenarios as there will then be fewer differences between them.

2.1.16 The different locations also present complexity in the highly unlikely event that SPR were to start but not complete construction at the site. In this event, National Grid would not be able to complete construction of the substation under the Sea Link consent without demolishing the partially constructed substation and re-constructing in a slightly different location. There is also a greater risk that the Sea Link team would develop something that may later delay SPR's plans or conflict with any early planting.

2.1.17 Therefore, the proposed approach will alter the area for Work 1B (and Work 4 as relevant) to be consistent with the area in the SPR consents. This would not allow construction of the substation outside the area already consented for it under the SPR applications. It would not require any change to the Sea Link Order limits or the Land Plans. All land within the revised area would be required for the Proposed Project as a whole and the size of the substation would remain as previously proposed, just with more flexibility over its location. The minor nature of the proposed change is not anticipated to result in any new or different significant environmental effects to those reported in the ES. This will be confirmed in the Environmental Statement Addendum (ESA) submitted with the Change Request. The environmental effects have been fully assessed previously as the revised area is that assessed in the SPR DCO applications.

2.1.18 The proposed change is not considered likely to affect compliance of the project with planning policies.

2.1.19 The Applicant proposes to also update the Proposed Project's Works Plans to provide clarity on the areas for drainage. Areas for drainage are currently not shown on the Works Plans as drainage is covered as associated development in Schedule 1 Part 1 (2) rather than having a separate Works number. It is clear from Relevant Representations that this is causing confusion amongst stakeholders about whether the project is intending to take the same approach to drainage as SPR, and whether there is sufficient space for these works. Whilst the Applicant can provide reassurance on both points, this becomes much easier to explain with consistent plans.

2.1.20 The update on how drainage is shown would not be a change to the development, or works proposed, but can be completed in parallel with the Friston change to bring clarity. The Applicant proposes to similarly denote areas for other works not given a specific Works number in the Works Plans to address queries raised by the Examining Authority on this point in the Section 89 letter dated 5 September. This is again not a proposed change to the development or application but will hopefully deliver additional clarity. This approach would be adopted across all areas of the project.

2.1.21 The proposed change is shown on the figure in Appendix B.

### **Change 3: The Henge, Suffolk**

2.1.22 This change proposes to amend the Order limits to remove the potential Neolithic hengiform monument feature from the Order limits and to introduce additional land to enable the underground cable to be routed around the feature. The proposed



revision to the Order limits would allow a 30 m buffer between the amended Order limits and the henge, as shown on the figure in Appendix C.

- 2.1.23 The henge was recorded during trial trenching completed in July 2025, after submission of the DCO application. A feature in this location was previously identified through geophysical survey but was assessed by heritage specialists as likely to be a partial enclosure associated with a prehistoric field system. Therefore, the geophysical survey did not identify this area as being an area of high risk for heritage and was therefore not prioritised in the trial trenching programme. This area was one of the last to be surveyed because it was not associated with one of the more substantial elements of development (e.g. a substation), it was not identified as being high risk for heritage, and was timed to reduce damage to crops.
- 2.1.24 It is common for trial trenching programmes for underground cable routes and pipelines not to be available to inform the ES and to be carried out in whole or in part after consent of a project. Regarding this point, the Examining Authority for the Viking CCS Pipeline stated the following, in their Recommendation Report: *'the ExA consider that it would be disproportionate for the entire construction corridor to have been surveyed at this stage of the process, and it is inevitable that archaeological works and investigations would be iterative and reactive during both preconstruction and construction phases. So, the lack of knowledge regarding the full extent of archaeological deposits is not a specific concern of the ExA at this stage, and there is acknowledgement across the Applicant's documentation that mitigation would need to apply to unknown archaeological finds'*. Therefore, the fact that this trial trenching was not complete prior to submission of the application does not suggest a deficiency in the application or the ES. Indeed, it is positive that this feature has been identified now rather than post consent.
- 2.1.25 Evaluation trenching undertaken post-DCO submission identified that the enclosure was more substantial than had been thought following the geophysical survey and potentially represents a henge monument. Engagement with Historic England and the County Archaeologist for Suffolk was completed in July 2025 following the trial trenching, and they have considered that the asset meets some or all of the criteria (rarity, survival, group value etc.) for scheduling. The Order limits at this point in the cable corridor are narrow because efforts were made to reduce the land required for construction of the project in line with requirements of the Compulsory Acquisition process. The narrow Order limits at this point means that at present the underground cable would pass through the henge feature, potentially leading to significant adverse effects on the heritage asset. The current design also includes a haul road along the cable alignment for construction purposes, which is also likely to adversely affect any above ground elements of the feature.

- 2.1.26 The team explored whether a potential solution would be to use trenchless techniques, such as Horizontal Directional Drilling (HDD), to install the cable under the henge. However, this solution has been rejected because it would be challenging to identify the depth at which the asset would remain unharmed and therefore difficult to rule out harm to the asset. Given the potentially high value of the asset, this is not considered by the Applicant to be an acceptable risk. This solution would also provide a gap in the haul road, which would need to be re-routed, so would not avoid the need for a change to accommodate a new access solution.
- 2.1.27 Therefore, the only option that the Applicant is confident will avoid a significant adverse effect on the henge feature is to expand the Order limits to enable the cable to be re-routed around the feature. Archaeological work to date provides a good indication of the size of the asset and it would be unusual to find significant archaeology in close proximity to the henge due to the form of the monument and the way henges were used, as well as information we have from evaluation trenching that has been undertaken to date. However, given that the area outside the current Order limits has not yet been fully subject to geophysical survey or trial trenching, it is necessary to include sufficient flexibility within the Order limits for the cable to re-route either to the east or the west of the asset, and to allow sufficient space to microsite the route alignment. Geophysical survey is planned for September/ October 2025 to provide further information on the heritage value of the proposed additional areas, which will provide further information to assess the impact of potential amended alignments on heritage. Targeted trial trenching will be scheduled based on the findings of the geophysical survey and will provide information to inform archaeological mitigation and final cable routeing implemented at construction. The Applicant would only exercise Compulsory Acquisition powers over land required for the final alignment, as confirmed during detailed design after trial trenching is complete.
- 2.1.28 The statutory heritage stakeholders (Historic England and the Suffolk County Archaeologist) have advised that avoidance through extending the Order limits, as proposed above, is their preferred approach so the Applicant's understanding is that this proposed change is supported by heritage stakeholders. The solution has also been discussed with East Suffolk Council (ESC) and Suffolk County Council (SCC), who also expressed the view that this is the most appropriate solution.
- 2.1.29 The additional land was included in the original Phase 1 habitat survey, which confirmed it is arable farmland of low ecological value; the same habitat that is affected by the current route. The works proposed would be the installation of an underground cable and temporary haul road routed to avoid existing high value trees. Land would be reinstated following construction resulting in no loss of agricultural

land. The cable route could potentially be closer to properties but would retain a separation distance. Therefore, whilst the Applicant is undertaking further work to inform an ESA to submit with the Change Request, it is considered highly likely that this work will conclude that no new or different significant environmental effects would result from the proposed change for any topic other than heritage. For heritage the proposed change would avoid a potential significant adverse effect on the henge.

- 2.1.30 The proposed change would increase compliance with national and local planning policy through avoiding harm or loss of a heritage asset, the henge.
- 2.1.31 National Grid is engaging with landowners of affected parcels to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it has not been possible to gain their consent for the proposed change in advance of this Change Request notification.
- 2.1.32 The proposed change to the Order limits is shown in on the figure in Appendix C, with the potential henge shown as a circular feature on the plan.

#### **Change 4 – Benhall Railway Bridge**

- 2.1.33 This change proposes to introduce land into the Order limits along the B1121, including Benhall Railway Bridge over the railway and associated land along the highway to the east and west of the bridge between the A12 and Grays Lane/ Forge Close. The proposed change also includes additional land to the east of the B1121 and a small stretch along the railway line.
- 2.1.34 The main access to the proposed new converter station in Suffolk crosses the bridge on the B1121 known as Benhall Railway Bridge. Suffolk County Council's Relevant Representation dated 29 May 2025 states that *'The structural condition of the bridge means that it has been restricted to STGO (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads ("AILs") due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12. Additionally, Benhall Railway Bridge is not currently included within the Draft Order Limits for the Sea Link proposals'*.
- 2.1.35 This weight limit on Benhall Railway Bridge would not be an impediment to the majority of construction traffic accessing the converter station as loads would not exceed the weight limit. However, it could be a factor in planning the movements of the Abnormal Indivisible Load (AIL) vehicles associated with the transport of seven



transformers, a piling rig and a mobile crane. The final detail of AIL routing and solutions for movements is typically developed after a DCO is made when the loads and programme for movements is known. This is partially because the loads and programme for delivery will be known in detail only when a contractor is on board; and partially because the condition of the public highway is constantly changing so there is potential for change between the Application and construction (for better or worse). However, the Applicant has agreed to look at the solution for Benhall Railway Bridge now to provide reassurance to SCC and ESC that the proposed solutions are feasible and acceptable.

2.1.36 The Applicant's previously anticipated solution was to install a 'mini-bridge' overbridge structure within the highway boundary that would avoid weight being placed on the bridge abutments to the restricted limits; with the mini-bridge anticipated to be installed on approximately 15 occasions over the 4-year construction period. This solution can be achieved without the area of highway required being included in the Order limits due to the powers already in the Order and consents to be obtained outside the DCO. However, SCC and ESC have requested that the area required be added to the Order limits so the planned works and the consenting mechanism for those works are clear. To respond to this request, the Applicant is proposing to add the areas of highway required for this solution into the Order limits for the project.

2.1.37 Further, on 6 August 2025 a meeting was held between the Applicant, SCC and ESC, including a discussion on Benhall Railway Bridge. Three main options were discussed for enabling the vehicles over the weight limit to cross the bridge:

- 1/ Installation of the 'mini-bridge';
- 2/ Works to fix the bridge; or
- 3/ Installation of a semi-permanent overbridge structure.

2.1.38 Option 1 can be completed entirely within the highway, but it would be preferable for adjacent land to be available for a compound during installation and storage of materials between installations. It may be possible to reduce the time for highway closures if this adjacent land is available, and it would potentially avoid the bridge being transported to and from an off-site location between uses. It also provides more flexibility in terms of how the overbridge is assembled and moved into place. SCC has expressed concern that a methodology developed later may require this additional land and whilst the Applicant is confident this is not the case, the inclusion of additional land increases flexibility and provides reassurance that this solution is possible to implement.

- 2.1.39 Option 2 would involve intrusive investigation work to clarify the condition of the bridge and any issues experienced. The initial investigation undertaken by SCC was not intrusive and does not provide certainty on the bridge condition so further study would be required to define any remedial works that could be undertaken to bring the bridge back up to standard. Should those remedial works be of a scale and programme that is reasonable for the Applicant to implement, the Applicant has agreed to consider implementing Option 2. Option 2 could deliver additional benefits by permanently improving the highway as well as removing the need for road closures to install overbridges both for the Sea Link project and any future projects such as LionLink. It would provide a permanent solution to the issue rather than the temporary solution offered by Option 1. The Applicant recognises the additional benefits offered by Option 2 as discussed with SCC in August 2025.
- 2.1.40 Option 2 would require establishment of a temporary compound adjacent to the bridge and access to the bridge for investigation and improvement works. This access would include access to the underside of the bridge, so would also require access to a short section of the railway. The inclusion of land to the east of the B1121 and a limited area along the railway line to enable consideration of this option. The Applicant regularly obtains consents and permissions to carry out works on Network Rail land for normal operational and construction purposes and is seeking to engage with Network Rail to agree consents prior to consent to carry out investigative works and confirm the feasibility of Option 2.
- 2.1.41 Option 3 would involve installation of a semi-permanent overbridge structure. This is a structure that would be installed for the duration of the works rather than the mini-bridge structure that would be installed and removed for each one or two-way movement. This option is considered likely to have more adverse environmental and traffic impacts than the mini-bridge so is not currently preferred; but in advance of detailed work by the contractor has not yet been ruled out. It is considered possible that this may become the preferred option if investigative work to the bridge shows that it may be a better solution, or potentially if the LionLink project will generate greater movements over the bridge that justify a semi-permanent solution to address traffic for both projects. This option would also require land to the east of the bridge outside the highway boundary for the construction of the bridge, a compound and a crane to lift the bridge into place.
- 2.1.42 The Applicant's proposed change to the Order limits would provide the flexibility to implement all three options currently under consideration; enabling joint working with SCC to explore the best option. Use of adjacent land to the east would be temporary as any AIL access during the operational period could be undertaken using Option 1 within the highway boundary or with no works required if Option 2 is taken

forward. Option 3 is only justified for multiple movements so would not be a preferred option during the operational period.

- 2.1.43 All options would involve work within the highway boundary and adjacent to the boundary for establishment of a temporary compound on an agricultural field. No trees would be removed to facilitate the works. It is likely that a section of hedgerow would need to be removed to enable construction and operation of an access to the land to the east. The proposed revised Order limits allows both for an access directly from the B1121 and from Shotts Meadow in advance of discussions with the landowner and SCC on how the parcel might be best accessed. The existing field access from Shotts Meadow would require the removal of a very small section of hedgerow, likely less than 5m. The access along the B1121 would require greater temporary hedgerow removal for a new access and the required bellmouth and visibility splay. This is anticipated to be a maximum of 35m of hedgerow, subject to design. Any affected hedgerow for provision of access could be reinstated when use of the adjacent land ceased unless otherwise agreed with the landowner (see below).
- 2.1.44 No significant groundworks would be required so there would be no anticipated significant adverse effect on archaeology and there would be no loss of agricultural land. For all options construction noise and dust issues would be temporary, short in duration and not occurring adjacent to residential properties. Therefore, whilst there may be a need for temporary hedgerow removal for the access, the Applicant considers it unlikely that the proposed change will result in any new or different likely significant environmental effects. The area in the extended Order limits is primarily an agricultural field and existing highway; so provides habitats that are similar to habitats found elsewhere within the Order limits, as considered in the DCO application.
- 2.1.45 The area of land to the east of the B1121 is allocated for housing in the Suffolk Coastal Local Plan (Adopted September 2020); it is the site known as 'Land South of Forge Close between Main Road and Ayden, Benhall' (SCLP12.43). The land proposed for temporary construction and storage would include the majority of this allocated land. The temporary use of the site by the Applicant would not affect the long term development of the site for housing.
- 2.1.46 The allocated site was subject to an Outline Planning Application for 41 dwellings submitted in May 2021. The application remains 'awaiting decision' in September 2025, with no new documents uploaded on the application since October 2024. The Applicant is in discussions with East Suffolk Council to understand the position with this application and is similarly commencing discussions with the landowner on a



potential land agreement and the status of the application. Given the timescale elapsed on the application to date and the need for further Reserved Matters applications before work begins on site, it is considered unlikely that the site is likely to be developed imminently, although the Applicant is seeking to understand the programme to confirm. Option 1 can proceed without this land so if there is a conflict between the development of the site and use of the site as a compound/ lay down area for Option 1 the mini-bridge can be installed within the highway boundary and stored off site to avoid a conflict between development of the allocated site. Option 2 would likely only be feasible if carried out in advance of construction of the Proposed Project, so would likely be completed prior to development of the housing site. Should Option 3 be selected, the programme would be managed in partnership with the developers to minimise disruption and Options 1 and 2 could be implanted if there was a significant issue with Option 3.

2.1.47 It should be noted that the planning application for the housing site would require construction vehicles and residents to access the site from the B1121, with a new access proposed in a similar position to that proposed by the Applicant to this land parcel. Construction of this access would require removal of hedgerow similar to that required for the temporary use of the field by the Applicant. Should it be beneficial to the delivery of a site allocated in the Local Plan, the Applicant could construct and leave in place the access from the B1121, potentially facilitating development. Further, given that the A12 is the other side of Benhall Railway Bridge from the allocated site, future deterioration of the bridge could affect access to the site and it would be beneficial to future residents if Option 2 were explored now rather than later when limited land is available adjacent to the bridge to facilitate construction works. Therefore, whilst inclusion of the land may, in the worst case scenario, delay development of the allocated site; in the best case scenario it may accelerate construction and give more certainty that the site can be accessed from a main road efficiently in the long term. It is not therefore considered that inclusion of this land conflicts with the Local Plan.

2.1.48 National Grid is engaging with landowners of affected parcels, including Network Rail, to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it has not been possible to gain their formal consent for the proposed change in advance of this Change Request notification.

## **Change 5 - Increase in area for maintenance of a new hedge to south of B1119**

- 2.1.49 This change proposes to broaden the strip of land south of the B1119 in Suffolk to accommodate a new hedge alongside the existing drainage and water main. This proposed change is in response to landowner feedback around the maintenance approach to the drain, the confirmation of the presence of a water main and to provide flexibility in how the future planting will be maintained.
- 2.1.50 The new hedge in this location is included in the ES and is essential mitigation. It is presented as mitigation in APP-348 (superseded by AS-059) (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk). The hedgerow is predominantly proposed for landscape and visual purposes, although it also would have benefits in providing ecological connectivity.
- 2.1.51 The area of the Order limits along the B1119 is very narrow near Fristonmoor Lane. The Applicant deliberately kept these narrow to minimise the impact on the adjacent fields. A concrete drain lies adjacent and parallel to the road, which the Applicant believes is constructed predominantly to drain the highway, although it has not yet been possible to confirm. One of the landowners of a field to the south of the road has made the Applicant aware that this drain is currently maintained by the landowner from his field to the south, rather than the highway authority from the road, and that it is also connected to field drains.
- 2.1.52 Whilst the strip of land along the B1119 in the Order limits is sufficient for the existing drainage and adjacent proposed planting, it is not sufficient to also include a maintenance strip between the two. The landowner has highlighted to the Applicant that this would be problematic as the landowner would be unable to maintain the ditch using his current equipment. The landowner raised concerns about the impact this could have on flooding along the road and in the field; and the health and safety implications of instead maintaining the drain from the road.
- 2.1.53 The proposed change would amend the Order limits to the south of the road to provide sufficient space to provide a strip of land between the new planting and the drain to enable maintenance of both; and a strip to the south of the planting to enable the Applicant to maintain the planting if the landowners would not like to. This additional space also enables the planting to be located further from the existing Northumbrian Water Group (NWG) water main (operating in the locality as Essex and Suffolk Water); although it is anticipated that hedgerow planting will be acceptable above the main as it is now.

- 2.1.54 The proposed change is not likely to result in any new or different likely significant environmental effects as the area in the extended Order limits are similar to those habitats found elsewhere within the Order limits, as considered in the DCO application and the proposed change is limited to moving a proposed hedgerow a short distance to the south. The proposed change would also have no implications for compliance of the project with national and local planning policy.
- 2.1.55 National Grid is engaging with landowners of affected parcels to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it has not been possible to gain their consent for the proposed change in advance of this Change Request notification.
- 2.1.56 The proposed change to the Order limits is shown on the figure in Appendix E.

## 3 Potential for Proposed Changes to affect the Environmental Statement

### 3.1 Overview

- 3.1.1 The PINS Guidance (2024) requires that the change notification includes “*a statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects. This should include a summary description of those effects and any mitigation proposed.*”
- 3.1.2 A review and appraisal of the proposed changes against all topics forming part of the environmental impact assessment (EIA) has been undertaken to determine whether any of the proposed changes (either individually or in combination) would result in any new or materially different significant effects beyond those reported in the ES. This review has informed the commentary provided in section 2 of this letter.
- 3.1.3 This review has concluded that the proposed changes (either in isolation or in combination) are unlikely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the ES [APP-041 to 300]. Work is ongoing to confirm this and a statement will be submitted with the Applicant’s formal request to change the application, following proposed consultation (step 3).
- 3.1.4 It is not considered necessary or appropriate to carry out any publicity that reflects the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). However, if such publicity is subsequently considered to be required, this would be carried out following acceptance of the proposed changes (if accepted) and the Applicant is confident there is time for all

required processes set out in the EIA Regulations to be accommodated in the examination process. This consultation would then be conducted in parallel with consultation under the CA Regulations.

## 4 Compliance with the Infrastructure Planning (Compulsory Acquisition Powers) Regulations 2010 (CA Regulations)

### 4.1 Overview

- 4.1.1 In accordance with the PINS guidance (2024), the Applicant confirms that a number of the proposed changes involve changes to the Order land and as a result, additional compulsory acquisition powers are sought. As set out above, given that the need for the proposed changes has arisen recently, the Applicant is not able to confirm that consent from all persons with an interest in the additional land has been obtained prior to this notification.
- 4.1.2 Regulations 5 to 19 of the CA Regulations are therefore engaged and the PINS Guidance (2024) requires a detailed description of how the procedures in regulations 5-19 of the CA Regulations can be accommodated within the examination timetable.
- 4.1.3 The Applicant is carrying out processes to identify and consult land interests in parallel with this notification. The Applicant will engage with the additional persons with an interest in land in order to seek their consent to the additional powers being included in the application. An update on the progress of these discussions and a copy of any landowner consent obtained, will be included with the formal change application. If their consent has not been obtained by the date of submission of the change application, the Applicant will publish any required notices in accordance with the CA Regulations and provide the required documents as prescribed by regulation 5 of the CA Regulations.
- 4.1.4 At the time when this letter was written the Rule 6 letter had not been published and no examination timetable is therefore available. Given the notification is being submitted prior to the Rule 6 letter being issued, the Applicant is confident there is time for all required processes set out in the CA Regulations (including consultation and publication of the proposed changes which affect additional land/submission of any necessary documentation and the holding of any compulsory acquisition hearings) to be accommodated in the examination process.



## 5 Consultation

### 5.1 Introduction

- 5.1.1 The Applicant recognises that it is for the ExA to conclude whether consultation is necessary and what constitutes adequate consultation. As such, the Applicant welcomes any comments from the ExA as to the need, scale and nature of consultation and, in particular, on the adequacy of the Applicant's proposed approach to consultation as outlined below.
- 5.1.2 PINS guidance (2024) states that before making a written request (Step 4) it is recommended that applicants consult all those persons prescribed in the PA2008 under section 42 (a) to (d) who would be affected by the proposed change (giving a minimum of 28 days).
- 5.1.3 PINS guidance (2024) states that: *'if a targeted approach to the identification of those affected by the proposed change is adopted then detailed justification should be provided about why the applicant considers it is not necessary to consult all the prescribed persons... If applicable, applicants should identify any newly prescribed persons in relation to the proposed change but were not consulted in relation to the original application.'*
- 5.1.4 The advice in PINS guidance (2024) has been taken into account in developing the strategy below.

### 5.2 Targeted Consultation

- 5.2.1 The Applicant engaged with Dover District Council, Thanet District Council and Kent County Council on 9<sup>th</sup> September 2025, and East Suffolk Council and Suffolk County Council on 11<sup>th</sup> September 2025 on the proposed changes in their respective areas.
- 5.2.2 The Applicant has also engaged with Historic England and the County Archaeologist for Suffolk on the results of geophysical and trial trenching and the proposed change options available to reduce environmental impacts associated with Change 3 – The Henge; including discussing the proposed solution.
- 5.2.3 Change 4 – Benhall Railway Bridge has also been in discussions with the Local Highway Authority (SCC) since January 2025. This includes a detailed discussion on the options for access over the bridge discussed in a face to face meeting on 5<sup>th</sup> August 2025 (as detailed in section 2 above) and informal discussions held in September 2025 on the proposed change to the application.

- 5.2.4 The Applicant is in the process of engaging with landowners affected by areas of additional land, with further discussions to be held in September/ October 2025 once land referencing of additional areas is complete.
- 5.2.5 The Applicant also met with the Planning Inspectorate to provide a briefing on the proposed changes on 11<sup>th</sup> September 2025.
- 5.2.6 Given the limited nature of the proposed changes, the Applicant proposes to carry out a targeted consultation with local authorities, prescribed consultees, persons with an interest in land affected by the proposed changes (Section 42 (a) to (d) parties) and a select group of households, as shown in Table 2. Whilst not all proposed changes will be relevant to all parties; all parties listed would be consulted on all proposed changes.

**Table 2 – Proposed consultees for each proposed change**

	Proposed change number				
	1	2	3	4	5
Consultee	Hoverport, Kent	Friston (Kiln Lane) substation, Suffolk	The Henge, Suffolk	Benhall Railway Bridge - Suffolk	Increase in area for hedge maintenance to south of B1119, Suffolk
Marine Management Organisation	✓				
Natural England	✓	✓	✓	✓	✓
Kent Wildlife Trust	✓				
Suffolk Wildlife Trust		✓	✓	✓	✓
Historic England	✓	✓	✓	✓	✓
The Maritime and Coastguard Agency	✓				
National Highways				✓	
The Office of Rail and Road				✓	
Internal Drainage Board					✓

	Proposed change number				
	1	2	3	4	5
Consultee	Hoverport, Kent	Friston (Kiln Lane) substation, Suffolk	The Henge, Suffolk	Benhall Railway Bridge - Suffolk	Increase in area for hedge maintenance to south of B1119, Suffolk
Northumbrian Water Group (operating in the locality as Essex and Suffolk Water)				✓	✓
Cadent Gas (asset present in the road)					✓
BT (asset present in the road)					✓
Manston Airport (their outfall lies within the footprint of the hoverport)	✓				
Thanet Offshore Wind Farm	✓				
Nemo Link	✓				
Environment Agency	✓	✓	✓	✓	✓
Network Rail				✓	
Sizewell C (due to their planned use of the railway in 2026)				✓	
Scottish Power Renewables (due to)		✓	✓		

	Proposed change number				
	1	2	3	4	5
Consultee	Hoverport, Kent	Friston (Kiln Lane) substation, Suffolk	The Henge, Suffolk	Benhall Railway Bridge - Suffolk	Increase in area for hedge maintenance to south of B1119, Suffolk
changes at Friston substation)					
UK Power Network			✓	✓	
Landowners (inc tenants, lessees or occupiers of the land, or legal interest in the land).	✓	✓	✓	✓	✓
Kent County Council	✓				
Suffolk County Council		✓	✓	✓	✓
Thanet District Council	✓				
East Suffolk District Council		✓	✓	✓	✓
Relevant Parish Councils	✓	✓	✓	✓	✓

5.2.7 The Applicant will fully consult with all persons with an interest in land who will be affected by the proposed changes to the application. This is a similar approach to the targeted consultation completed in November – December 2024 for changes to the application prior to submission and is compliant with the principles of the Statement of Community Consultation. The Applicant also proposes to consult a small number of residents living in close proximity to Benhall Railway Bridge where their property location could mean that they would be a Category 3 person.

5.2.8 The Applicant does not consider it necessary to publicise under the EIA Regulations 2017. If ExA considers this is necessary then it would be completed at a later date, potentially in parallel with consultation on the CA Regulations.

5.2.9 Subject to the ExA's comments, the Applicant proposes a 28-day consultation period, with targeted consultees provided with a letter outlining the proposed changes, consultation scope, form of notice, dates of consultation and details of how to participate in the consultation. The letters will refer recipients to the Applicant's website, which will contain further information to include:

- Consultation document providing further information on the proposed changes and their likely impacts, including any environmental effects. This document will include plans showing the location of the proposed changes, likely to be the same as those presented in Appendices A to E to this letter.
- Request for comments on the proposed changes to be provided by email or post.

5.2.10 The Applicant proposes making relevant documentation available online for consultees to access. However, a phone number and e-mail address will be provided for people to request hard copies. These contact details could also be used to contact the Applicant to ask questions on the proposed changes.

5.2.11 Given the limited nature of the proposed changes and the targeted approach to consultation, no in-person consultation events or online webinars are considered necessary.

5.2.12 The Applicant considers that the above steps will allow those in the wider community, in the areas where the limited changes are proposed, to comment on the proposed changes should they wish to do so.

### 5.3 Proposed Change Consultation Report

5.3.1 All responses on the proposed changes (including those received from parties who have not been written to specifically) will be analysed and considered by the Applicant. The results of the consultation and details of how the Applicant has considered the content of the consultation responses will be reported in a Proposed Change Consultation Report and submitted to the ExA as part of the formal request for proposed changes. Any alterations to the nature or number of changes proposed as a result of the targeted consultation will also be reported in the Proposed Change Consultation Report.



## 6 Indicative Programme

- 6.1.1 The Applicant is mindful of the need to bring forward any proposed changes to the Proposed Project as soon as possible, as encouraged by PINS guidance (2024) and as requested in the Examining Authority's S89(3) letter of 5 September 2025.
- 6.1.2 The Applicant proposes to adopt the timetable set out in Figure 1. The timetable has been devised with a view to ensuring that consultation on the proposed changes can be concluded and a formal application for the proposed changes can be made to the ExA before the start of the Examination process.
- 6.1.3 The programme provided in Figure 1 is aligned to PINS guidance (2024) with the six stages being:
- Stage 1: Applicant decides to request changes to an application which has already been accepted for examination (during the pre-examination or examination stage) and informs the ExA in writing (this Change Request notification letter).
  - Stage 2: ExA provides advice to the Applicant about the procedural implications of the proposed changes and about the need, scale and nature of consultation that the Applicant should undertake before submitting the change application.
  - Stage 3: Applicant carries out consultation about the proposed changes.
  - Stage 4: Applicant makes a formal request to the ExA to change the application by providing the relevant information as set out in PINS guidance (2024).
  - Stage 5: ExA decides whether to accept or reject the change application.
  - Stage 6: Where the ExA has decided to accept the change application, the Examination proceeds by considering the 'changed application'.
- 6.1.4 The Applicant intends to submit the change application prior to or shortly after the start of the Examination. The final date in November that a Change Request is submitted would be influenced by the number and nature of consultation responses received; and the extent to which they result in amendments to the changes as outlined in this notification letter.

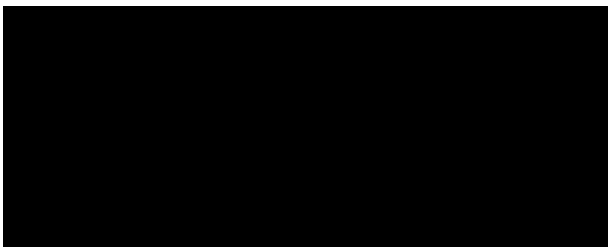
**Figure 1: Indicative programme for implementing changes to the Proposed Project**

[illegible]

Week beginning	CA Regulation	8/09/2025	15/09/2025	22/09/2025	29/09/2025	6/10/2025	13/10/2025	20/10/2025	27/10/2025	November	December	January	February
<b>Task</b>													
Certificates of compliance submitted	Reg 9												
Notice of any hearings	Reg 14 and 15												
ExA Initial Assessment of Issues	Reg 11												
ExA sets timetable to examine Change Request	Reg 12												
Hearings (if required)	Reg 14, 15 and 16												
Written representations	Reg 12 and 13												
Responses to written representations and any final comments	Reg 12 and 13												Potentially also early March

- 6.1.5 As set out above, the Applicant considers that the early submission of this change notification, prior to the Rule 6 letter being issued, the Applicant is confident there is time for all required processes to be undertaken with no delay to the start or completion of Examination. The Change Request will be accompanied by an ESA and Proposed Change Consultation Report. The Change Request will all be accompanied by revised versions of all application documents as required to implement the changes, including, but not limited to the Works Plans, Land Plans, Book of Reference, Statement of Reasons and draft Development Consent Order.
- 6.1.6 I would be grateful if you could acknowledge safe receipt of this letter. We would also be grateful for the opportunity to discuss next steps, as well as any queries the Examining Authority or the Inspectorate may have regarding the proposals outlined above. In the interim, the Applicant will continue to prepare the request for the proposed changes and anticipate that the consultation process will proceed in accordance with the timetable outlined above.

Yours sincerely,



Senior Project Manager

For and on behalf of National Grid Electricity Transmission plc

Encs.

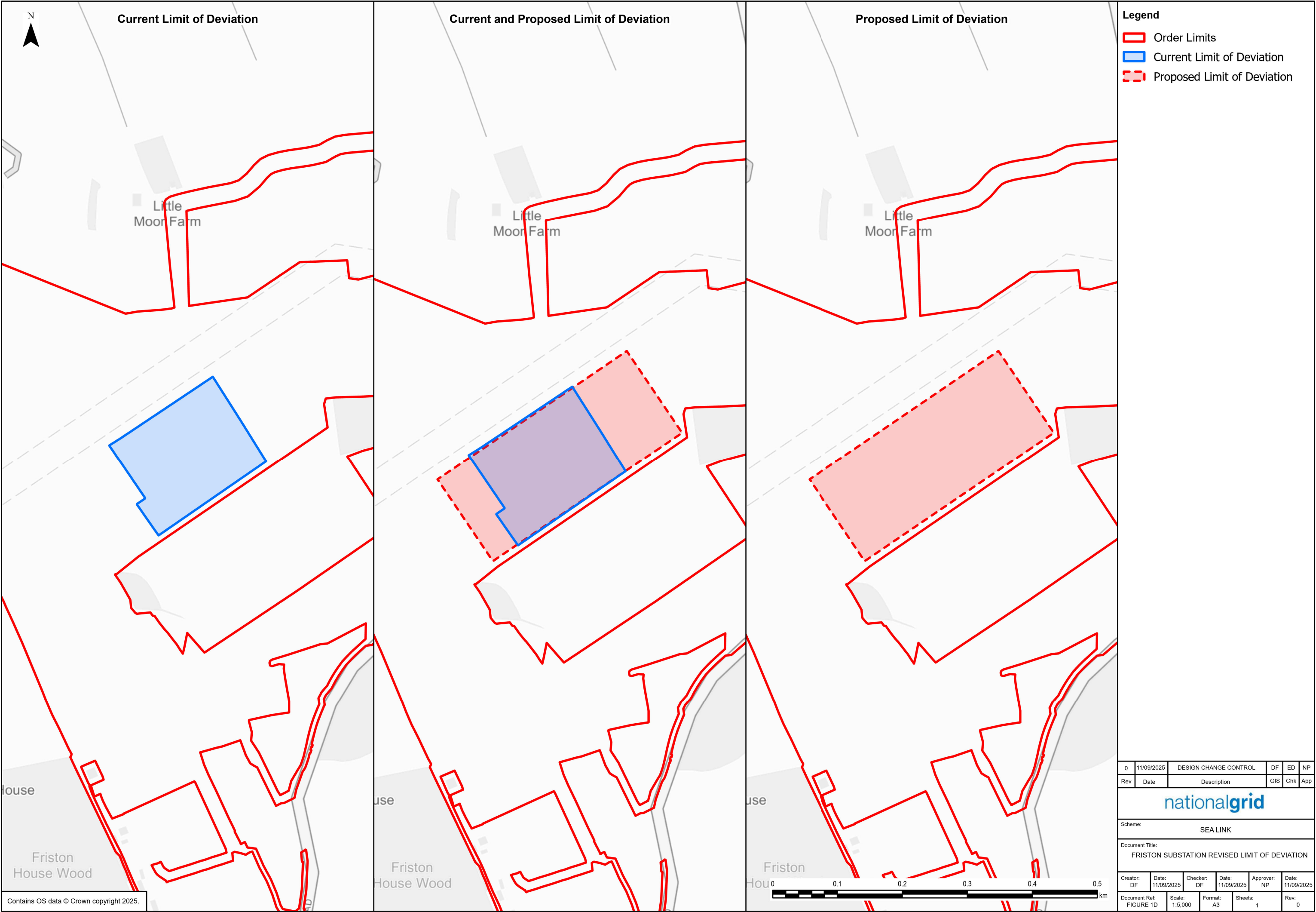
- Appendix A: Change 1 Hoverport, Kent Proposed Change Drawing
- Appendix B: Change 2 Friston substation, Suffolk Proposed Change Drawing
- Appendix C: Change 3 The Henge, Suffolk Proposed Change Drawing
- Appendix D: Change 4 Benhall Railway Bridge, Suffolk Proposed Change Drawing
- Appendix E: Change 5 Increase in area for maintenance of a new hedge to south of B119, Suffolk Proposed Change Drawing

**Appendix A: Change 1 Hoverport, Kent Proposed Change Drawing**





**Appendix B: Change 2 Friston substation, Suffolk Proposed Change Drawing**



**Appendix C: Change 3 The Henge, Suffolk Proposed Change Drawing**



**Legend**

- Proposed Order Limits
- Current Order Limits
- Archaeological Feature
- 30m Buffer around Henge

0	15/09/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App

**nationalgrid**

Scheme:

SEA LINK

Document Title:

SUFFOLK REVISED ORDER LIMITS AROUND HENGIFORM FEATURE

Creator: <div>DF</div>	Date: <div>15/09/2025</div>	Checker: <div>DF</div>	Date: <div>15/09/2025</div>	Approver: <div>NP</div>	Date: <div>15/09/2025</div>
Document Ref: <div>FIGURE 1B</div>	Scale: <div>1:7,500</div>	Format: <div>A3</div>	Sheets: <div>1</div>	Rev: <div>0</div>	



**Appendix D: Change 4 Benhall Railway Bridge, Suffolk Proposed Change Drawing**



**Legend**

Proposed Order Limits

Current Order Limits

0	15/09/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App

**nationalgrid**

Scheme:

SEA LINK

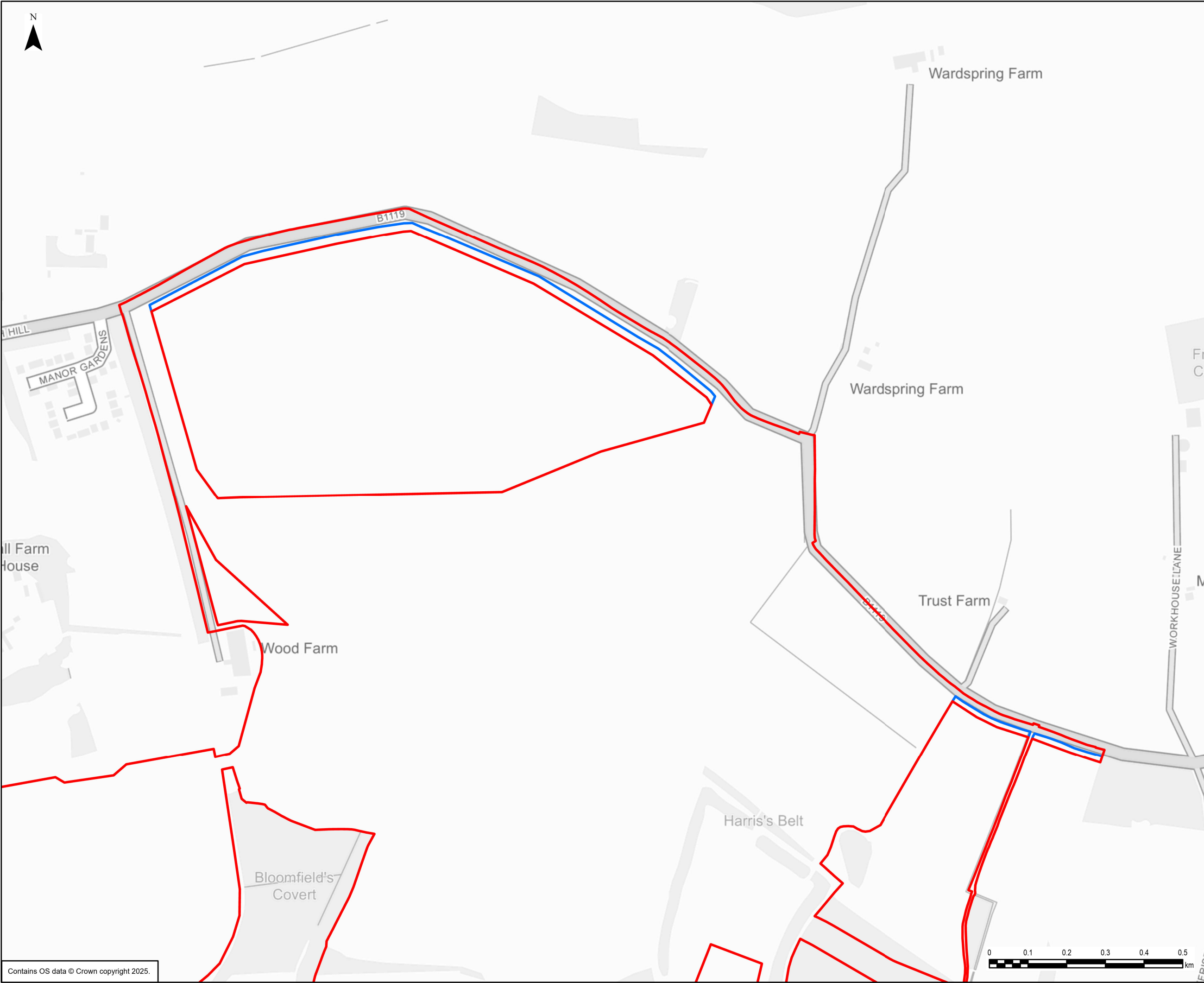
Document Title:

SUFFOLK REVISED ORDER LIMITS  
BENHALL RAILWAY BRIDGE

Creator: <div>DF</div>	Date: <div>15/09/2025</div>	Checker: <div>DF</div>	Date: <div>15/09/2025</div>	Approver: <div>NP</div>	Date: <div>15/09/2025</div>
Document Ref: <div>FIGURE 1A</div>	Scale: <div>1:7,500</div>	Format: <div>A3</div>	Sheets: <div>1</div>	Rev: <div>0</div>	

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**Appendix E: Change 5 Increase in area for maintenance of a new hedge to south of B119, Suffolk Proposed Change Drawing**



**Legend**

Proposed Order Limits

Current Order Limits

0	15/09/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App
nationalgrid					
Scheme: SEA LINK					
Document Title: SUFFOLK REVISED ORDER LIMITS B1119 LANDSCAPING					
Creator: DF	Date: 15/09/2025	Checker: DF	Date: 15/09/2025	Approver: NP	Date: 15/09/2025
Document Ref: FIGURE 1E	Scale: 1:9,058	Format: A3	Sheets: 1	Rev: 0	

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