



# Planning Inspectorate

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The applicant, all interested parties,  
statutory parties and any other person  
invited to the preliminary meeting

Your Ref:

Our Ref: EN020026

Date: 25 September 2025

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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), The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 9 and The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 – Regulations 5-19**

### **Notification of Applicant's Intention to Submit a Request for Proposed Changes to the Development Consent Order (DCO) Application**

The applicant gave notice to the Examining Authority (ExA) on 16 September 2025 of its intention to submit a request for proposed changes to the above application. The ExA used its discretion to accept the notification letter [\[AS-138\]](#) on 17 September 2025.

This letter provides advice to the applicant about the procedural implications of the proposed changes.

### **The proposed changes**

The applicant has submitted notification of up to five proposed changes to the application which relate to the following elements of the proposed development:

- Change 1: Change to access at the Hoverport, Kent
- Change 2: Change to works plans at Friston (Kiln Lane) substation, Suffolk
- Change 3: The henge, Suffolk
- Change 4: Benhall railway bridge, Suffolk
- Change 5: Increase in area for maintenance of a new hedge to south of B1119

As set out in the [Planning Inspectorate's Advice](#), upon receipt of a request to make a change to an application, the ExA must initially consider whether the development now

being proposed is, in substance, the same as the development which was originally applied for. The ExA must also consider if the combined impact of a series of incremental changes, may collectively result in a materially different project.

The ExA notes that the five potential change requests have been developed following technical and survey work, and seek to respond to concerns raised during engagement with stakeholders and through relevant representations. Each potential change is relatively contained in scope and relates to site-specific matters identified during pre-examination. The ExA is therefore satisfied that the proposed changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was applied for.

### **ExA's comments on each proposed change**

#### **Change 1: Change to access at the former Hoverport, Pegwell Bay, Kent**

The proposed change is to extend the order limits to widen the access to the intertidal area from the former Hoverport at Pegwell Bay to ensure that encroaching saltmarsh can be avoided. The ExA notes that the revised order limits do not exclude the area of saltmarsh that the applicant proposes to avoid and includes a substantially larger area of the hoverport than was previously proposed. The ExA understands the reasons for wishing to amend the order limits but requires further justification for the full extent of the area sought, as this now includes the Manston Airport outfall and the majority of the Hoverport frontage, which relevant representations highlight as a locally important walking and recreational area. The applicant's change application should address the extent of saltmarsh and its migration as well as the potential for the access route options to impact on golden plover using the saltmarsh and intertidal areas.

#### **Change 2: Change to works plans at Friston (Kiln Lane) substation, Suffolk**

The applicant states that the proposed change is to extend the area for work 1B for Friston substation to align with those consented through the two Scottish Power Renewables (SPR) projects. This will either be presented as a proposed change to the limits of deviation (LoD) or a proposed change to the works area to align with the SPR works plans. In appendix B of [\[AS-138\]](#) it is presented as a revised LoD.

The ExA notes that the revised LoD extend northeast virtually up to the order limits adjacent to the woodland at Laurel Covert. When compared with the applicant's document [\[AS-063\]](#), the LoD would appear to conflict with the SPR consented outline landscape mitigation to the northeast of the proposed substation.

The revised LoD appear to occupy a larger footprint than work no. 41 of the made East Anglia One North (EA1N) Order, as shown on the onshore works plan certified by that Order (Project EN010077 sheet 7 of 12 [\[REP11-004\]](#)). Appendix B of [\[AS-138\]](#) also appears to show a smaller separation between the National Grid substation and Laurel Covert than that shown on figure 3 of the final Outline Landscape and Ecological Management Strategy [\[REP13-007\]](#) certified by the made EA1N Order.

The ExA notes that the intention behind this proposed change is to reduce the complexity of the Friston substation scenarios. However, the area now proposed for the application

LoD differs from the EA1N Order LoD. Please consider this in your proposed change application.

The change applications should also provide clarification regarding the height of the proposed substation and whether it would align with the height of the National Grid substation in the EA1N Order.

The ExA notes that updates will also be required to the Environmental Statement (ES) [APP-048], including the landscape and visual impact assessment [APP-097] and [APP-098], ES figures [APP-208], [APP-209], [APP-210], [APP-211], [APP-212], [APP-213] and [APP-214] and the landscape mitigation [AS-059]. If the applicant relies on any assessments undertaken for the SPR projects as part of the ES addendum then it should summarise these and explain why they remain valid and relevant to the proposed development.

The ExA expects that neighbouring residents would be consulted as the increase in the LoD could result in the substation being closer to them than is currently proposed under Friston scenario 2.

The applicant has indicated that it intends to add the areas for drainage works associated with the Friston sub-station to the works plans. While the ExA welcomes this clarification, it notes that the applicant's description of the proposed consultation documents does not refer to the amended works plans. The ExA considers that the amended works plans should be included in the consultation documents. The relevant Internal Drainage Board should also be added to the list of consultees for this proposed change.

### Change 3: The henge, Suffolk

The ExA notes that there will be further archaeological investigative works on both the henge and the surrounding area in September and October 2025. If this provides sufficient information to set a route for the proposed cable to either the west or east of the henge, then the ExA expects this to be reflected in the order limits set out within the change application. If the full extent of flexibility as shown on the change notification figure in appendix C [AS-138] is sought in the change application, the ES addendum should justify this position and explain the process for selecting a final cable route.

As noted in [AS-138], the proposed alternative cable routes around the henge would be closer to neighbouring properties. The ExA expects that any resultant change to the potential impacts to neighbouring occupiers are addressed by the applicant.

### Change 4: Benhall railway bridge, Suffolk

There are three options proposed by the applicant for the bridge as set out in [AS-138]. If all three options are retained in the change application, then the ES addendum would need to assess the worst-case parameters, and for option 2 that should include operational phase effects, and identify additional mitigation proposed. The ExA would also expect the change application to consider any effects on the highway network from any options proposed.

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

The ExA has no comments to make in relation to change 5 at this stage.

## Examination Timetable

The applicant intends to submit a change application in November 2025 (figure 1 [AS-138]). The ExA notes that the change application will be accompanied by revised versions of all application documents as required, including, but not limited to the works plans, land plans, the Book of Reference, Statement of Reasons and dDCO.

The ExA notes that the applicant concludes the proposed changes are unlikely to affect the conclusions in respect of significant environmental effects as presented in the ES, and this would be confirmed through an ES addendum as part of the change application. The ExA also notes that the applicant does not anticipate that the proposed changes would require an update to its Habitats Regulations Assessment [AS-007]. Consideration should be given to whether the assessment of effects on the golden plover qualifying feature of the Thanet Coast and Sandwich Bay SPA and Ramsar site requires updating as a result of the addition of land as part of Change 1. The ExA recommends that the applicant consult with relevant statutory bodies regarding its findings prior to submission.

All the proposed changes, except for Change 2, would require revision of the order limits. As a result, the applicant states that additional compulsory acquisition powers would be sought. The ExA therefore agrees with the applicant that regulations 5 to 19 of the CA Regulations would be engaged (section 4 [AS-138]). We note that the applicant is carrying out processes to identify and consult land interests in parallel with the change notification. The applicant will engage with the additional affected persons (APs) with an interest in land, and existing APs who may be more affected by the proposed changes, to seek their consent to the additional powers being included in the application. The ExA notes that if agreement on acquisition from all APs has not been obtained by the date of submission of the change application, the applicant will publish any required notices in accordance with the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) and provide the required documents as prescribed by regulation 5 of the CA Regulations.

The ExA is satisfied that if we decide to accept the proposed changes, there is time to accommodate the opportunity for all IPs to make representations on the changed application during the examination, in line with the principles of fairness and reasonableness.

Our current view, which may alter depending on the content of the change application, is that the proposed changes may be examined as follows (using the draft examination timetable detailed in the Rule 6 letter [PD-010]):

- Proposed changes to be considered as part of the ExA's first written questions to be published on or before Wednesday 17 December 2025.
- All IPs to respond to the proposed changes by deadline 3 (Wednesday 7 January 2026).
- Proposed changes to be considered as part of the planned compulsory acquisition and issue specific hearings week commencing 26 January 2026.
- Further opportunity for all IPs to respond to the proposed changes by deadline 4 (Tuesday 10 February 2026).
- Potential for ExA further written questions and/or hearings week commencing 23 February 2026.

It is our view that this programme would enable a thorough examination of the proposed

changes within the statutory timescales of the examination and without a need to revise the dates within the examination timetable contained in our Rule 6 letter [\[PD-010\]](#). However, we emphasise that the submission of any proposed changes later than November 2025 could compromise our ability to examine them fairly and reasonably within the statutory timescales and would, at the very least, require amendments to the dates within the examination timetable. We therefore strongly encourage the submission of all proposed changes (and all supporting material) no later than the currently proposed deadline 1A (Wednesday 26 November 2025).

### **Next Steps**

As per the [Planning Inspectorate's Advice](#), the ExA will decide whether to accept or reject any change application, made for changes 1-5, after it has considered the consultation responses and any other representations made on this matter.

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**

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