



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.25 Procedural Deadline A Cover Letter

Planning Inspectorate Reference: EN020026

Version: A
October 2025

nationalgrid

Page intentionally blank

Sarah Holmes
Lead Member of the Examining Authority
Sea Link DCO
The Planning Inspectorate
National infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

BY EMAIL ONLY

8 October 2025

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

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

I write in response to your Rule 6 Letter [**PD-010**] published 19 September 2025.

As requested, I set below the Applicant's views on arrangements for future examination hearings (including the use of virtual methods) and also suggest possible changes to the draft examination timetable that is set out in **Annex D** of **PD-010**.

These comments are provided with a view to making sure that all parties have the opportunity to fully participate in the Examination as well as ensuring that the Examining Authority ('ExA') is provided with the best possible information in response to the Written Questions without placing an undue strain on the resources of all participants in the DCO process, including hosts authorities and statutory bodies.

I also write to confirm details of further documents that we are submitting to the ExA alongside this letter, including those errata matters that re identified in **Annex G** of **PD-010**.

Initial Assessment of Principal Issues

The Applicant has no comments on the ExA's Initial Assessment of Principal Issues as set out in **Annex C** of the Rule 6 Letter [**PD-010**] and agrees that the National Policy Statements (NPS EN-1, NPS EN-3 and NPS EN-5) should form an integral part of the Examination.

Attendance at the Preliminary Meeting, Open Floor Hearings (in Suffolk and Kent) and Issue Specific Hearing 1

The Applicant confirms that it will be in attendance at the hearings identified in the Rule 6 Letter, being the Preliminary Meeting, the Open Floor Hearings, as well as Issue Specific Hearing 1.

The Applicant anticipates that the ExA will wish to allow the fullest use of the Open Floor Hearings to allow members of the public and other Interested Parties to speak directly to the Examining Authority about their views on the application. Accordingly, the Applicant does not anticipate needing to respond in detail to submissions made at the Open Floor Hearings nor to provide any detailed statement at the Open Floor Hearings.

The Applicant proposes instead to provide written responses, where appropriate and if requested, to the representations made at the Open Floor Hearings. The Applicant otherwise intends to restrict its oral contributions to points of clarification, as and when those would assist the ExA.

Future Examination Hearings

Whilst recognising the rationale behind holding later examination hearings in a central location or virtually rather than in Suffolk or Kent, the Applicant considers it important that attendance to these events is as convenient for local residents as possible. For this reason, the Applicant would prefer to see hearings held in both Suffolk and Kent wherever possible rather than at a central location. In the Applicant's view it should be possible to arrange hearings so that they are held close to the location of the issues being discussed.

Due to the nature of the project, the issues on the project identified in Relevant Representations tend to be specific to Suffolk, Kent, or the marine element of the project, with limited overlap. This is illustrated in **Annex C** of the **PD-010** which presents the initial assessment of principle Issues, many of which are specific to particular areas of the project. In this context, it may work well for stakeholders, local people, and the Examining Authority to have Issue Specific Hearings on 'Suffolk issues' in Suffolk and 'Kent issues' in Kent. Hearings on marine issues could perhaps be held in a central location given they affect both counties but the majority of issues are offshore. With this approach, there may be limited duplication in discussions, whilst making it easier for local communities and local authorities to participate in person should they wish to.

The Applicant considers it particularly important that any Compulsory Acquisition Hearings are held as in person events in Suffolk and in Kent. The Applicant is happy to travel to Kent and Suffolk and would accept some duplication in discussions, for example on the draft

Development Consent Order, if the Examining Authority decide to hold hearings in both locations.

Publication of Detailed Hearing Agendas

The Applicant is aware of the demands that the Examination process puts on statutory bodies and host authorities and thinks that it would be helpful for all parties if detailed agendas could be published by the ExA ten working days ahead of the hearings, both to help parties prepare for the hearings and also to ensure that the appropriate people are available.

Draft Examination Timetable

ExA'S First Written Questions

The Applicant is grateful for the opportunity to comment on the proposed approach to hearings and the draft Examination Timetable and hopes that the comments provided are helpful to the ExA. Whilst broadly welcoming and accepting the Draft Examination timetable set out in **Annex D** of the Rule 6 Letter [PD-010], the Applicant is concerned over the proposal to publish the **ExA's First Written Questions (ExQ1)** on **17 December**, with **responses required by 7 January 2026**.

Written questions can be about anything contained in the application information or other submissions such as relevant representations, and will the input of a large network of staff and technical experts for all parties. As the Proposed Project is a large linear scheme with both offshore and onshore impacts that has been the subject of over 6,000 Relevant Representations it seems likely that the ExA will raise a number of Written Questions.

The proposed timetable currently requires all participants to respond over the Christmas and New Year period and the Applicant considers that responding to the ExA's Written Questions over this period and in such a such space of time raises health and wellbeing issues for all parties.

The proposed timetable currently requires all participants to respond over the Christmas and New Year period. There are only twelve working days between 17 December and 7 January, a period that includes three Bank Holidays (Christmas Day, Boxing Day, and New Years Days) staff and suppliers, including at the many specialist supplier firms who provide the expert resource necessary to inform this complex application, will have already committed to periods of family leave around the festive period. The Applicant considers that responding to the ExA's Written Questions over this period, and in such a such space of time, is likely to present real logistical issues around access to the resources and expertise needed to inform fully comprehensive responses. It also places a heightened workload

burden on the reduced staff who may be working for parts of the Christmas and New Year period, which we must consider in the context of a duty of care.

Such a short period of time is not long enough for all parties in the DCO process to provide the best quality information in response to the ExA's Written Questions, particularly given the level of public interest and the complexity of the Proposed Project.

As currently proposed the draft Examination timetable for responding to the ExA's Written Questions puts an unnecessarily difficult burden on all participants, including host authorities and statutory bodies and the Applicant feels that affording more time to consider and respond to the first round of written questions will be of most value to the ExA and other interested parties, and will reduce the risk that certain matters which could otherwise be robustly addressed at that stage may require ongoing attention in later stages of the Examination.

Noting that the ExA will want to see the **Responses to their Written Questions** before the dates reserved for **Issue Specific Hearings (due w/c 26 January 2026)**, the Applicant suggests that the ExA's Written Questions are published **as soon as practical after Tuesday 18 November 2025**. By this time the ExA will be well placed to publish written questions, as the first round of Open Floor Hearings and an Issue Specific Hearing will have been held and the ExA will be in receipt of the Local impact reports (LIR) from the host authorities as well as the Applicant's Responses to Relevant Representations.

If it is not possible to issue final written questions then the Applicant requests that the ExA considers using the technique used recently in the Examination of the **Springwell Solar Farm DCO Application** of publishing **draft Written Questions** that will be substantially the same as the final Written Questions. For Springwell Solar Farm the draft Questions were actually set at the Pre-Examination Stage (as part of the Rule 6 Letter) but for the SEA Link DCO this could be **as soon as practical after Tuesday 18 November 2025**.

Publication of the ExA'S Second Written Questions and commentary on the draft DCO

The Applicant notes that the draft timetable has the ExA potentially publishing a Second Round of Written Questions **W/C Monday 23rd February** with responses required by **10 March**, which will potentially be a tight turnaround depending on the number of Written Questions.

The same consideration applies to the proposal to publish the ExA's commentary on the draft DCO by **3 March** with a response required by **10 March**, a turn round of a week. Noting that the ExA's commentary may raise some fundamental and significant issues the Applicant considers that it would be better if the commentary could be published earlier in the process, perhaps alongside the ExA's Written Questions perhaps **by Tuesday 24th February**.

The Applicant feels it would be helpful if the ExA could clarify when it is intended to publish this Schedule of Changes noting that comments on the **draft DCO Schedule of Changes** are due by **Deadline 7**.

Sites for the potential accompanied Site Visits

The Applicant is aware that in their Relevant Representation **[RR-2032]**, Historic England has raised concerns about the level of impact on the setting of Richborough Roman Fort. The Applicant has a different view, and we engaging with Historic England with a view to agreeing a common position over this level of visual impact. Whilst optimistic that a common position with Historic England can be reached on this issue, the Applicant suggests that if this matter is not resolved then the ExA may wish to make a site visit to Richborough Roman Fort to view the potential impact.

Errata and Additional Documents

Annex G, Item 7: Responses to Relevant Representations

The Applicant can confirm that it has reviewed all the Relevant Representations (RRs) published on the Planning Inspectorate website, and that it intends to submit a document responding to the RRs at **Deadline 1**. This will include the Applicant's responses to the ten RR identified by the ExA in **PD-006**.

To keep this document to a manageable size, the Applicant intends to provide a direct response to some RR (such as those from landowners, Host Authorities and the ten RR identified by the ExA), whilst other RRs that raise similar issues have been grouped together and an overarching response to that issue provided.

To demonstrate to the ExA that all relevant representations have been considered in the response the Applicant will identify the names of the parties and the relevant examination library that raised the issue in an appendix to that response.

Annex G, Item 8: Diligent enquiry into land interests

The Applicant conducted referencing activities throughout the pre-application process to identify all land interests as set out in the Land Referencing Methodology document. This

process was conducted using a combination of Non-Contact and Contact land referencing and utilised Landowner Interest Questionnaires (LIQs) and continued communications with landowners. No LIQ responses, or landowner conversations, indicated the presence of caravans within the project's order limits, or other similar parties who may hold an interest in land.

Subsequent to the ExA's notification of the caravans an additional review has taken place and contact was made with the affected landowner, who's agent was not aware of the presence of the caravan. An additional review of the order limits has not identified any further caravans.

The identified caravan within the order limits will be treated as a Cat 1 Party to the scheme, as such they will be encouraged to obtain professional representative to guide them through the examination. The relevant DCO documents will be updated for **Deadline 1**, including but not limited to, the Book of Reference, Land Rights Tracker and Statement of Reasons Appendix B. The Rule 6 and Rule 9 letters have been hand delivered to the caravan occupant and we will continue to ensure this continues throughout the DCO Process.

Annex G, Item 9: Errata

The Applicant submits alongside this letter various documents that are either to update previously submitted documents or to address errata as set out in **Annex G** of **PD-010**. These are identified in Table 1, below.

Table 1: Procedural Deadline A Submission

Document	Reason for Submission
1.3 (F) Navigation Document (Clean)	Updated to reflect this Procedural Deadline A submission.
1.3 (F), Navigation Document (Tracked Changes)	
2.3 (B) Land Plans	As requested by the ExA in the Rule 6 Letter [PD-010].
2.4 (B) Special Category and Crown Land Plans	Updated following the Rule 6 Letter [PD-010] (see below).
4.2 (D) Statement of Reasons (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
4.2 (D) Statement of Reasons (Tracked Change)	

Document	Reason for Submission
4.2.2 (B) SoR Appendix B Schedule of Negotiations with Land Interests (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
4.2.2 (B), SoR Appendix B Schedule of Negotiations with Land Interests (Tracked Changes)	
4.2.3 (B), SoR Appendix C Special Category Land Report (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
4.2.3 (B), SoR Appendix C Special Category Land Report (Tracked Changes)	
4.3 (B), Book of Reference (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
4.3 (B), Book of Reference (Tracked Changes)	
6.2.2.2 (B), Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.2.2.2 (B), Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Change)	
6.2.2.6 (B), Part 2 Suffolk Chapter 6 Agriculture and Soils (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.2.2.6 (B), Part 2 Suffolk Chapter 6 Agriculture and Soils (Tracked Change)	
6.2.3.2 (C), Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.2.3.2 (C), Part 3 Kent Chapter 2 Ecology and Biodiversity (Tracked Changes)	
6.2.3.6 (B), Part 3 Kent Chapter 6 Agriculture and Soils (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].

Document	Reason for Submission
6.2.3.6 (B), Part 3 Kent Chapter 6 Agriculture and Soils (Tracked Changes)	
6.3.2.2.B (B) ES Appendix 2.2.C Suffolk Wintering Birds Report (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.3.2.2.B (B) ES Appendix 2.2.C Suffolk Wintering Bird Report (Tracked Change)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.3.2.2.C ES Appendix 2.2.C Suffolk Breeding Bird Report (Clean)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.3.2.2.C ES Appendix 2.2.C Suffolk Breeding Bird Report (Tracked Change)	As requested by the ExA in the Rule 6 Letter [PD-010].
6.4.4.6 (B), ES Figures Marine Archaeology (Clean)	Updated by the Applicant to address Errata.
6.4.4.6 (B), ES Figures Marine Archaeology (Tracked Changes)	Updated by the Applicant to address Errata.
6.4.4.6.A (B), ES Figures Marine Archaeological Technical Report (Clean)	Updated by the Applicant to address Errata.
6.4.4.6.A (B), ES Figures Marine Archaeological Technical Report (Tracked Changes)	Updated by the Applicant to address Errata.
7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI) (Clean)	Updated by the Applicant to address Errata.
7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI) (Tracked Change)	Updated by the Applicant to address Errata.
7.5.7.2 Outline Landscape and Ecological Management Plan - Kent	Submitted by the Applicant to assist the examination
9.16 Land Rights Tracker	As requested by the ExA in the Rule 6 Letter [PD-010].

Document	Reason for Submission
9.20.1 Landfall Sediment Modelling Report (Aldeburgh)	New document submitted to assist the Examination
9.20.2 Landfall Sediment Modelling Report Pegwell Bay	New document submitted to assist the Examination
9.21 Sea Link Cable Burial Risk Assessment	New document submitted to assist the Examination
9.25 Procedural Deadline A Cover Letter	Covering Letter for Procedural Deadline A

Bat Survey Tree Report

Paragraph 1.5.2 of ES Appendix 2.2.H Bat Tree Survey Report identifies trees due for removal that were also identified as having potential roost features (PRF) based on an initial inspection from the ground. However, paragraph 1.5.2 goes on to explain that these trees were all subject to subsequent investigation (either a PRF aerial inspection or emergence survey). Paragraphs 1.5.3 and 1.5.4 then confirm that following this further investigation the classification was revised and only three of the trees that are to be removed were confirmed to still have PRF: 1-2, 162-2 and 423-2. This matches the text in paragraph 2.9.108 of APP-049. Therefore, this is not an error.

Environmental statement chapter 2 ecology and biodiversity

The definitions of 'moderate beneficial' and 'moderate adverse' effects in **Table 2.8** of **APP-049** and **Table 2.9** of **AS-047** have been updated, although these do not alter the conclusions of the assessment. The definition of a 'moderate beneficial' effect has been amended to note that it could be either permanent or temporary depending on the scale and the duration. The CIEEM guidelines are non-specific regarding decisions over effect classification, leaving considerable latitude for interpretation. Minor beneficial effects are appropriately defined as 'permanent,' and this definition has therefore not been changed. Taking points 1 and 2 in the description together as intended, a minor beneficial effect would be a permanent addition, but one that has small effect on the key characteristics of the resource. A temporary impact that also has small effect on the key characteristics of the resource would be negligible. In addition, a clarification of the definitions of 'moderate adverse' and 'major adverse' has also been added in paragraph 2.4.59 of APP-049 and paragraph 2.4.65 of AS-047 in response to a comment from Natural England in their Relevant Representation.

Special Category and Crown Land Plans

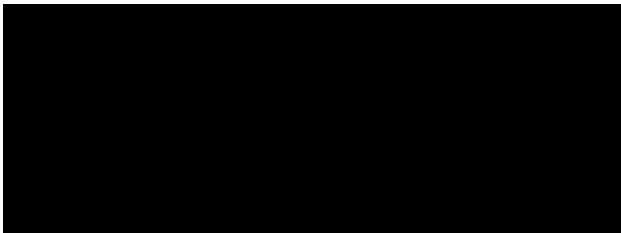
The Sea Link proposed project adopted a precautionary approach toward the identification of Special Category Land (Open Space) within its proposed order limits, this included a substantial intertidal area and an element of foreshore in Kent known as Pegwell Bay. It has since come to light that this area is subject to a Direction restricting public access under the Countryside and Rights of Way (CROW) Act 2000. The Directive confirms the land is closed under CROW s26 to prevent disturbance to sensitive birds, 365 days a year as mitigation specified in the Habitats Regulations Assessment.

A copy of the Direction and Map showing the extent of the restricted area is now appended to 2.4 (B) Special Category and Crown Land Plans as Appendix C.

Conclusion

I trust that the attached information is satisfactory but if we can be of any further assistance then please do not hesitate to contact me.

Yours sincerely,



Senior Project Manager

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com