

Sea Link

Volume 9: Examination Submissions

Document 9.34.4: Applicant's Comments on Relevant Representations from Other Developers

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5. Detailed Responses to Relevant Representations of Other Developers

1.1.1 The Tables below comprise the Applicant’s response to the Relevant Representations of other developers.

Table 5.1 Applicant’s Response to the Relevant Representation of BL Solar 12 (Helios Energy Park) Ltd

Reference	Summary of relevant representation	Applicant’s Response
5.1.1	<p>This representation is submitted on behalf of BL Solar 12 (Helios Energy Park) Limited, in its capacity as a National Energy System Operator (NESO) customer with a grid connection offer for a solar and battery energy storage system (BESS) development at the Friston 400kV substation located in East Suffolk.</p> <p>Helios are developing plans for a 249.9MW Energy Park, comprising ground-mounted solar and BESS and are in active dialogue with landowners in the local area of the Friston substation to realise this project, in conjunction with its wider land interests.</p>	<p>The Applicant welcomes Helios Energy Park’s engagement with the Proposed Project.</p>
5.1.2	<p>Helios supports the SEA Link development in principle and acknowledges its role in the energy transition. Helios is eager to collaborate with the SEA Link Applicant to advance its own goals in the</p>	<p>The in-principle support offered by Helios and their willingness to work collaboratively is welcomed.</p>

Reference	Summary of relevant representation	Applicant's Response
	Suffolk region. A draft Statement of Common Ground (SoCG) between SEA Link and Helios is currently being developed as part of the SEA Link Examination.	The SoCG between the parties captures the matters discussed to date and will be maintained over the course of the Proposed Project's Sea Link's Examination.
5.1.3	<p>Helios has identified four main areas where its project interfaces with the SEA Link project.</p> <p>Helios received a grid connection offer from NESO in December 2023 for 249.9 MW import/export capacity at Friston 400 kV substation. This connection is listed under Helios's former name, Lime Tree Energy Park, in the NESO TEC Register.</p> <p>Helios is actively working with NESO under the new Connection Reform methodology to finalise its grid connection.</p> <p>The Friston substation, designed by NGET, includes potential bays to which Helios could connection, though a separate planning application would be needed for cable access. Helios must consider how its infrastructure will connect to Friston substation, especially in relation to SEA Link's Order Limits. Helios asks SEA Link to continue engaging to ensure its access to Friston substation is not negatively impacted and viable connection routes are preserved.</p>	The prospective asset interfaces between the two projects are noted. The Applicant will maintain ongoing dialogue to work collaboratively with Helios regarding these matters and secure any agreements that may be needed to protect respective interests in the future.
5.1.4	As well as its own land interests, Helios are in dialogue with a number of landowners included in the SEA Link Book of Reference. Given the nature of these discussions and to maintain confidentiality at this stage, Helios prefers not to disclose the	Comments noted. The Applicant will maintain ongoing dialogue with Helios about interfaces and affected land.

Reference	Summary of relevant representation	Applicant's Response
	<p>specific landowners but is happy to discuss this further with SEA Link.</p> <p>Helios would ask that SEA Link maintains a dialogue with Helios as their plans are developed so as to understand where efficiencies and economies of scale can be achieved in both projects.</p>	
5.1.5	<p>It is anticipated that the Helios Energy Park would be promoted through the Development Consent Order (DCO) process in due course. It is acknowledged that the timing of SEA Link and Helios projects are likely to fall sequentially both from a development but also a construction timeline perspective.</p> <p>In the interest of mitigating both community and environmental impacts, Helios is keen to collaborate with SEA Link on an assessment of the practicality of:</p> <ul style="list-style-type: none"> • Installing additional cable ducts at certain crossing points, where Helios cables could subsequently be pulled through; • Utilising established, albeit temporary, construction access points on identified land parcels; • As well as understanding whether other efficiencies in project delivery could be achieved through broader co-ordinated working. 	<p>The Applicant welcomes Helios' commitment to ongoing engagement and exploring opportunities for coordination.</p> <p>Ongoing engagement will provide an opportunity to address interfaces and explore coordination, in accordance with the requirements of the relevant National Policy Statements.</p>
5.1.6	<p>Helios have attended quarterly Strategic Energy Projects Meetings since May 2024, as chaired and co-ordinated by East Suffolk Council, which include</p>	<p>The Applicant welcomes Helios' commitment to ongoing engagement and exploring opportunities for coordination.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>Scottish Power, NGET and National Grid Ventures amongst its attendees.</p> <p>Helios has attended monthly Major Projects Co-ordination meetings since June 2024 as chaired and co-ordinated by SEA Link.</p> <p>It is acknowledged that Helios has yet to seek a Scoping Opinion on its proposals and therefore does not feature in the SEA Link cumulative projects map. Following over a year of participation in the aforementioned forums, Helios intends to remain a member to maintain collaborative working practices as individual projects advance</p>	

Table 5.2 Applicant’s Response to the Relevant Representation of Blue Transmissions London Array Limited

Reference	Summary of relevant representation	Applicant’s Response
5.2.1	<p>Looking at the overall location plan it is likely the electrical export cables from the London Array windfarm to the onshore substation that are part of the offshore transmission system owned by Blue Transmission London Array Limited. As such we need both to be consulted and the opportunity to feedback the associated crossing requirements. There will need to be a crossing agreement put in place and maybe a proximity agreement depending on the scope.</p>	<p>The proposed cable route corridor is documented by APP-023 2.5.3 Work Plans – Offshore. The Applicant has designed the cable path such that the Proposed Project’s cable route corridor passes to the east of the London Array Windfarm and does not cross the export cables from the array. As such, no proposals have been developed for the provision of cable crossings.</p> <p>Further engagement with Blue Transmission London Array Ltd has been initiated, which confirmed that the proposed Sea Link cable corridor does not cross the export cables from the London Array and therefore no crossing / proximity agreement required.</p>

Table 5.3 Applicant’s Response to the Relevant Representation of East Anglia ONE North Limited and East Anglia TWO Limited (combined)

Reference	Summary of relevant representation	Applicant’s Response
5.3.1	<p>We refer to the above Project and confirm we are instructed by East Anglia ONE North Limited.</p> <p>1.2 East Anglia ONE North Limited is a wholly owned subsidiary of Scottish Power Renewables (UK) Limited (“SPR”) who are named as an Affected Person in the Book of Reference (APP-016). East Anglia ONE North Limited was granted a development consent order (“DCO”) on 31 March 2022 for the East Anglia ONE North Offshore Wind Farm (“EA1N”) and, as explained in paragraph 9.2, will soon be assigned the benefit of the SPR option agreements within the Project’s Order Limits and anticipate that the majority of the option notices will be served before the close of the examination. Therefore, EA1N should also be considered an Affected Person.</p> <p>1.3 EA1N consists of up to 67 wind turbines that are to be situated in the southern North Sea approximately 37.7km from the Suffolk coast at its nearest point off Lowestoft. EA1N makes landfall at Thorpeness where it connects to the underground cables which traverse Suffolk to the onshore substation situated near Friston. The EA1N DCO also included a National Grid substation which the onshore substation will connect into, as well as National Grid realignment works. The Project is also</p>	<p>The Applicant has engaged extensively with Scottish Power Renewables (SPR) throughout development of the Proposed Project. This engagement is documented in Table 2.1 of the draft Statement of Common Ground between National Grid and Scottish Power Renewables (document 9.59); citing examples of meetings and calls dating back to 2022.</p> <p>Given that the Applicant will design, construct and operate the Friston substation, close coordination between National Grid and SPR is essential for the progression and operation of EA1N and EA2.</p> <p>The Applicant’s team leading on the design of the Friston (Kiln Lane) substation has engaged regularly and thoroughly with the SPR teams because the substation is planned to be developed under the SPR consents (Sea Link Scenario 1). This engagement particularly ramped up in 2024/25 as the two teams worked together to progress discharge of SPR’s requirements related to Friston substation. The team leading design of Friston substation sits within the Sea Link project team and all team members report to the Sea Link Project Director, Head of Construction and Senior Project Manager. Given that the same team is working on both projects, feedback has implicitly considered Sea Link throughout; as well as being explicitly discussed in meetings.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>proposing to connect into the National Grid substation to be built under the EA1N DCO.</p> <p>1.4 As such, there is a lot of crossover and interactions between EA1N and the Project, most of which are summarised below and will be expanded on in EA1N's written representation at a later date.</p> <p>1.5 EA1N is anticipated to have an operational capacity of up to 900MW and has the potential to make a substantial contribution to UK 2030 energy targets by meeting nearly 5% of the UK offshore wind cumulative deployment target for 2030.</p> <p>1.6 EA1N has had limited engagement with the applicant during development of the Project.</p> <p>[Note - Similar text has been submitted by East Anglia TWO Limited in their Relevant Representation]</p>	<p>Outside Friston substation, there have also been a large number of Sea Link focused meetings between the Applicant and SPR to cover subjects such as how Sea Link will connect into the substation, where the cable route will interact with the SPR onshore cable and haul road, how the Applicant will contact landowners under Option to SPR and how the cable may affect the ongoing design of the site wide landscaping. This engagement has occurred between all levels of the project, from Project Directors to the teams leading on landscaping for the respective projects.</p> <p>SPR provided feedback at both non-statutory and statutory consultations on Sea Link, and this feedback has been taken into account as the project was finalised. Ongoing engagement seeks to manage the interactions between the projects including discussions on how interactions will be managed in construction and operation.</p> <p>The Applicant response also applies to East Anglia TWO Limited' Relevant Representation.</p>
5.3.2	<p>Landscaping:</p> <p>2.1 The Project, as currently formulated, potentially impacts on a number of landscaping proposals focused in and around the substation area in Friston including the consented and proposed permanent public rights of way diversions, woodland planting, hedgerow planting, landscape bunding for visual mitigation, grassland planting and operation SuDS ponds.</p> <p>2.2 There is also a potential impact from the Project within the area of EA1N's/EA2's permanent access road</p>	<p>The Applicant has been working closely with SPR to understand and resolve interfaces between Sea Link and SPR EA1N and EA2 landscape proposals and has had co-ordination meetings with SPR during the pre-application and pre-examination stages on this. The Applicant has explained the reason for the differences between the landscaping plans within SPR applications and those submitted with the Proposed Project application in their submission to the ExA in July 2025 [AS-061] and September 2025 [AS-148].</p> <p>Requirement 14 in the DCO for EA2 states that no stage of onshore works may commence until a landscape management plan <i>'(which accords with the outline landscape and ecological</i></p>

Reference	Summary of relevant representation	Applicant's Response
	to the onshore substation and associated mitigation planting.	<p><i>management strategy</i>)' (Outline LEMS) has been submitted and approved by the relevant planning authority. The interfaces between the Sea Link project and the EA1N/ EA2 project as shown in the Outline LEMS are described below.</p> <p>The Sea Link HVAC cables enter the site of the Friston substation from the north west and enter the new substation from the west. The current alignment shown in the Works Plans (document 2.5.1) would interact with three key features as shown on the EA2 Outline LEMS; a proposed cable sealing end compound to the north west of the substation, planting proposed to screen the new sealing end compound and a proposed new sustainable drainage system pond to the west of the proposed Friston substation. SPR has confirmed that the cable sealing end compound and drainage pond are no longer required and emerging plans that have been shared with Local Planning Authorities and others do not show these features. The small amount of planting to the north and west of the proposed sealing end compound in the Outline LEMS was proposed to screen the compound so would not be required in the same form without the compound in place. Given the limited area required for the cable easement, it would be possible to plant significantly more planting to the north west and west of Friston substation than is shown in the Outline LEMS, even with Sea Link cables in place. This would achieve better outcomes than can be achieved through the planting shown in the Outline LEMS and better outcomes than are strictly required by the EA1N and EA2 DCOs.</p> <p>The Sea Link HVDC cables similarly enter from the north west and travel south east to the east of the proposed Friston substation. The key interactions between these cables and features in the EA2 Outline LEMS are between the cables and two further proposed sealing end compounds and planting around these compounds. As with the compound to the north west of the substation, the</p>

Reference	Summary of relevant representation	Applicant's Response
		<p>Applicant understands that these elements of the project are no longer being taken forward. These cables would also interact with planting to the east of the Friston substation, although again, the aims of the Outline LEMS can be achieved with Sea Link cables in place.</p> <p>SPR has been developing more detailed landscaping proposals to discharge requirements and working closely with National Grid to do so. The Applicant and SPR are currently working together to develop a coordinated landscape mitigation plan. This plan would seek to avoid a situation where landscape planting is implemented by SPR, only then to be removed by a future project. This plan will seek to enable the function of the SPR mitigation planting to be maintained whilst also allowing for the various elements of the Proposed Project to be accommodated in this locality. It should be noted, however, that the Applicant cannot specify an exact time when it will be in a position to submit this, owing to dependence on SPR submitting their updated landscape design into the public domain as the coordinated plan will show their current landscape proposals. The Applicant understand that this is likely to be in December 2025.</p> <p>The Applicant is aware that EA1N and EA2 are developing detailed drainage proposals to be submitted later in 2025 to discharge their requirements. Once these plans are finalised the Applicant will work collaboratively with EA1N and EA2 to ensure that the operation of their SuDs ponds is unaffected by the Proposed Project. The Applicant understands that the SuDs pond being developed by the EA1N and EA2 will be a single infiltration pond located to the south-west of the combined substations platform, in Scenario 1, where EA1N and EA2 are delivered first, the Proposed Project does not propose to undertake any works in this area. In Scenario 2, National Grid would aim to deliver the same drainage</p>

Reference	Summary of relevant representation	Applicant's Response
5.3.3	<p>Flood Risk:</p> <p>3.1 Cumulative operational and construction drainage would need to be managed between EA1N/EA2 and the Project to ensure the drainage systems and SuDS ponds to be put in place by EA1N/EA2 remain within their design limits, preventing an increase in flood risk to Friston.</p>	<p>proposals, albeit potentially with minor changes if, for example, it is necessary to leave additional space for SPR to construct later. Under Scenario 2, operational drainage proposals would be submitted and approved by the local planning authority prior to construction in accordance with Sea Link requirement 6.</p> <p>The need for co-ordination with regard to operational and construction drainage between EA1N/EA2 and the Suffolk Onshore Scheme design in order to prevent an increase in flood risk to Friston is accepted by the Applicant. Separate attenuation features shall be provided by the Applicant to cover any increase in capacity required for temporary works during construction. The Applicant's inclusion of additional HV equipment at the proposed Friston Substation will not impact the size or drainage runoff characteristics of the substation and will therefore not impact on the drainage capacity requirements during the operational phase of the Proposed Project. The Applicant will continue to work with SPR during the design development of Friston substation and its associated drainage.</p>
5.3.4	<p>Operational Noise:</p> <p>4.1 There is a potential for cumulative noise issues to occur:</p> <p>4.1.1 during construction if there is an overlap of construction works between both the Project and EA1N/EA2, particularly where the Project will cross EA1N's/EA2's infrastructure and works and in and around Friston; and</p> <p>4.1.2 during the operational phase of EA1N/EA2 and the Project in and around Friston.</p> <p>4.2 Therefore, cumulative construction and operational noise in and around Friston needs to be managed to prevent over exposure cumulatively to sensitive receptors.</p>	<p>Cumulative noise effects were assessed and presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. No significant cumulative effects are expected from either construction or operational noise impacts from the Proposed Project and EA1N/EA2 in and around Friston.</p>

Reference	Summary of relevant representation	Applicant's Response
5.3.5	<p>Protective Provisions:</p> <p>5.1 Protective provisions for EA1N/EA2 are required in the Project's DCO to cover various interfaces between the Project and EA1N/EA2 including, but not limited to:</p> <p>5.1.1 the locations where the Project's proposed cable route crosses or is in the vicinity of EA1N's/EA2 cable route;</p> <p>5.1.2 requirements that National Grid Electricity Transmission (the "Applicant") will not exercise the compulsory acquisition rights they would acquire through the Project's DCO in relation to the construction of the National Grid substation near Friston and associated National Grid realignment works if EA1N/EA2 have already granted the Applicant the rights required to carry out these works as part of EA1N's/EA2's DCO; and</p> <p>5.1.3 protecting EA1N's/EA2's land rights so that the Project's compulsory acquisition powers do not override or interfere with EA1N's/EA2's interests over land, nor delay or prevent EA1N/EA2 from carrying out its construction works and/or maintenance to EA1N if operational.</p>	<p>The request for protective provisions for EA1N/EA2 is acknowledged. Ongoing engagement with SPR, regarding these two projects and their interface with Sea Link will seek agreement on the terms for asset protection, land rights and other requirements over the lifetime of the Proposed Project, and where necessary, their inclusion in the draft DCO. These issues have been recorded in the SoCG.</p>
5.3.6	<p>Construction Activity Interface:</p> <p>6.1 There is the potential for the Project's construction activities to conflict with EA1N's/EA2's construction activities, including, but not limited to, vehicle movements (including total daily movements), working time constraints, dust pollution and noise pollution. There is also the potential for the Project's construction works to be simultaneous with EA1N's/EA2's construction works.</p>	<p>The potential for cumulative effects to occur due to the simultaneous construction of the Proposed Project and EA1N/EA2 is considered in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060].</p>
5.3.7	<p>Archaeology:</p>	<p>The Proposed Project has engaged with SPR and has identified and considered the location of known heritage assets associated</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>7.1 There is existing archaeology within the EA1N/EA2 written scheme of investigation area over which the Project could interfere with, particularly the alignment of National Grid Electricity Transmission towers and the routing of the Extra High Voltage (EHV) cables. The Project should engage with EA1N/EA2 and ensure that they are fully aware of the heritage constraints in the area.</p>	<p>with EA1N/EA2 as part of the design development process. Further to this, the results of geophysical survey and the locations and results of archaeological trial trenching undertaken for EA1N/EA2 have been provided to the Applicant by the Archaeological Advisor from Suffolk County Council Archaeological Service so that all heritage constraints are understood and avoided. The submitted written scheme of investigation for the EA1N Project [REP6-005] was reviewed during the mitigation design for the Proposed Project to ensure that conflict with known archaeological remains and agreed mitigation areas was avoided. The impact of the Sea Link project on archaeology has been considered in full in the Sea Link Environmental Statement.</p>
5.3.8	<p>Ecology:</p> <p>8.1 EA1N/EA2 are aware from their studies that the Project has the potential to impact on badger setts, artificial badger setts, bat commuting hedge rows, bat commuting trees, reptile habitats and great crested newt positive ponds. The Project needs to ensure that they properly evaluate these and that it doesn't harm the mitigation that is proposed to be put in place for EA1N/EA2.</p>	<p>The impact of the Proposed Project on ecology in Suffolk has been considered in detail in Application Documents 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] , Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] and Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]. Mitigation for any potentially significant effects is set out in those documents, and in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [AS-059]. This includes assessment of impacts on, and where necessary mitigation for, badgers, bat commuting features, and reptile habitats. Impacts on great crested newts will be addressed through the Suffolk District Level Licensing Scheme. With the implementation of these measures, it is concluded that no long term significant residual adverse effects will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project. Proposals will not conflict with the mitigation proposed for EA1N/EA2.</p>

Reference	Summary of relevant representation	Applicant's Response
5.3.9	<p data-bbox="344 193 689 225">Compulsory Acquisition:</p> <p data-bbox="344 236 1115 416">9.1 EA1N/EA2 have concerns regarding the Project's work programme timings and how their construction works and compulsory acquisition powers will interact with EA1N's/EA2's construction works and operational project.</p> <p data-bbox="344 475 1151 1209">9.2 EA1N/EA2 are proceeding by way of voluntary agreements to acquire the whole or parts of land plots 2/20, 2/17, 2/72, 2/11, 2/15, 2/42, 2/99, 2/57, 2/58, 2/59, 2/60, 2/61, 2/63, 2/64, 2/65, 2/68, 2/69, 2/70, 2/71, 2/38, 2/36, 2/12, 2/8, 2/13, 2/73, 2/75, 2/82, 2/78, 2/79, 2/55, 2/83, 2/6, 2/5, 2/7. The option agreements in place are currently in the name of SPR; however SPR are in the process of assigning these to EA1N and East Anglia TWO. EA1N/EA2 are anticipating that the majority of the voluntary agreements will complete before the close of the Project's Examination period. However, it is unclear how long it will take the Land Registry to complete the registration of the option agreement assignments and following exercise of the various options it is unlikely that the Land Registry will have completed the registration and/or noting of the freehold transfers and leases before the close of the Examination. It is therefore key that the Applicant and EA1N/EA2 agree a way forwards that is acceptable to the Examining Authority on how to include these rights in the Book of Reference.</p> <p data-bbox="344 1273 1151 1414">9.3 Under the EA1N DCO EA1N also have rights in respect of the EA1N cables. Therefore, it is vital to EA1N that all of their land rights are reserved so that the Project's rights and DCO do not interfere with them.</p>	<p data-bbox="1173 193 2148 443">The Applicant is engaging with SPR in respect of the land rights required for Sea Link, overlap with those required for EA1N and EA2. Compulsory acquisition powers are required to ensure that the Applicant can deliver the Friston (Kiln Lane) substation should the land rights not be transferred to the Applicant by SPR; and to deliver associated works, particularly the HVAC and HVDA cables.</p> <p data-bbox="1173 459 2148 826">At the point of submission of Sea Link's Application, SPR had not exercised any of its Options to acquire the land rights in relation to Kiln Lane. The Applicant is aware that EA1N/EA2 have now exercised some of the Option agreements in respect of the plots identified and confirm they are in the process of updating the Book of Reference in that respect. We will be able to confirm the affected plot numbers once this update has taken place. The Applicant thanks SPR for providing relevant shapefiles to confirm the exercise of those options to circumvent the potential delays with HMLR registration.</p> <p data-bbox="1173 842 2148 1054">It is the Applicants' preference to reach a voluntary agreement with SPR for any land rights required, as set out in the Statement of Reasons (AP-012). Powers of compulsory acquisition are therefore sought on a precautionary basis to ensure that the Proposed Project can be delivered should voluntary agreement not be possible.</p> <p data-bbox="1173 1070 2148 1177">The Applicant will continue to engage with SPR and their professional representatives to endeavour to reach a mutually acceptable agreement on the land rights.</p> <p data-bbox="1173 1193 2148 1334">Since there will be some overlap with the current known SPR programme, careful CDM and onsite coordination will be implemented to ensure the works for Sea Link do not negatively impact the SPR construction works.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>9.4 With regards to the plots listed in paragraph 9.2 above, it is not clear from the Project's documents to date whether the Applicant requires additional rights over this land than has been consented under the EA1N/EA2 DCO and is proposed to be carried out under the EA1N/EA2 DCO.</p>	
	<p>9.5 There are several instances where the Project's Book of Reference is incomplete and does not note EA1N's/EA2's interests in land. EA1N/EA2 have flagged these to the Applicant but for completeness these are plots 3/20, 3/21, 3/22, 2/55, 2/83, 2/6, 2/5 and 2/7.</p>	
	<p>9.6 There are also several instances where the Project's Book of Reference (APP-016) plots are incorrect and amendments are therefore required. EA1N/EA2 have flagged these to the Applicant.</p>	
	<p>9.7 SPR have been listed in the Book of Reference as an occupier of plot 3/17; however this is incorrect and SPR do not have an interest in this plot. EA1N/EA2 have flagged this to the Applicant.</p>	

Table 5.4 Applicant’s Response to the Relevant Representation of Five Estuaries Offshore Wind Farm Limited

Reference	Summary of relevant representation	Applicant’s Response
5.4.1	<p>The DCO application for Five Estuaries was submitted to the Planning Inspectorate on 25 March 2024. The examination concluded on 17 March 2025, with a decision expected from the Secretary of State by 17 September 2025.</p> <p>Five Estuaries Offshore Wind Farm Limited wishes to register as an Interested Party for the Sea Link DCO Examination, as it may wish to participate in the Examination given the proximity of the two schemes, including a proposed crossing point and associated overlap of the offshore order limits. There is also commonality of certain stakeholders and the potential for similar or cumulative environmental effects and coordination of mitigation measures may be required to seek to minimise impacts on the marine environment and stakeholders.</p>	<p>The Applicant welcomes Five Estuaries Offshore Wind Farm Limited engagement with the Proposed Project and acknowledges the interfaces between the two projects</p>
5.4.2	<p>Five Estuaries is therefore interested in offshore construction and maintenance impacts particularly for shipping and navigation.</p> <p>Five Estuaries has reviewed the Sea Link application documents and the two projects have the potential to interact in the marine environment both in terms of a cable crossing to the west of the Margate and Long Sands SAC and marine operations in the vicinity of the Sunk pilot boarding station. Five Estuaries note the additional mitigation from Sea Link relating to concurrent construction</p>	<p>Sealink will be seeking to secure commitments in relation to Coordination of planned operations within the Sunk region, to avoid concurrent Restricted Ability to Manoeuvre (RAM) operations, in a similar way to Five estuaries. Although not submitted with the application, the applicant has since submitted a draft Outline NIP to PINS (9.12 Outline Navigation and Installation Plan [AS-104]) to secure these commitments. We will also continue to engage with other projects including Five Estuaries on any matters relating to cable crossings and associated marine operations.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>activities in proximity to the Sunk pilot boarding stations which broadly reflects the reciprocal commitment made by Five Estuaries. The Applicant (Sea Link) states in its Shipping and Navigation ES chapter [APP-080] that "Coordination of planned operations within the Sunk region, to avoid concurrent Restricted Ability to Manoeuvre (RAM) operations (such as cable lay and burial) with other projects in the Sunk area where possible, in particular regarding the North Falls and Five Estuaries Wind Farm projects." However it is not clear where this is secured. The Sea Link draft DCO [APP-007] Schedule 16 condition 4(1)(k) requires "a navigation installation plan for the relevant stage which is in general accordance with the principles set out in the outline navigation installation plan" however Five Estuaries could not find an outline plan submitted as part of the application. Five Estuaries secured this commitment in its Outline Navigation and Installation Plan (NIP) (Five Estuaries examination document reference REP7-048) and would expect this to be replicated in a similar Sea Link document.</p>	
5.4.3	<p>Five Estuaries welcomes the continued positive coordination with the Sea Link project, as outlined in 7.10 Coordination Document [APP-363], but would like to point out that whilst RWE is a common shareholder on the Five Estuaries and North Falls Offshore Wind Farms, the projects are not solely RWE projects and should not be referred to as such (an example of this is in paragraph 7.3.1). Whilst the Five Estuaries and North Falls Offshore Wind Farm</p>	<p>Comments regarding 7.10 Coordination Document [APP-363] are noted.</p> <p>The Applicant will continue to engage with Five Estuaries on an ongoing basis.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>projects are coordinating they remain two distinct projects being developed by these different shareholder groupings with separate DCO applications. For Five Estuaries, whilst RWE is the lead developer, all documents and engagement with the project should refer to Five Estuaries OWF, rather than RWE.</p>	
5.4.4	<p>The Examining Authority for the Sea Link DCO Examination may also wish to direct related questions to Five Estuaries Offshore Wind Farm Limited.</p>	<p>Comments noted.</p>

Table 5.5 Applicant's Response to the Relevant Representation of National Grid LionLink

Reference	Summary of relevant representation	Applicant's Response
5.5.1	<p>Both projects share a connection point at Friston Substation.</p> <p>There is potential to coordinate cable routing and co-locate converter stations to minimise disruption and optimise infrastructure delivery. Discussions between NGLLL and Sea Link are ongoing to manage the interface and spatial overlap between the two projects.</p> <p>NGLLL has been engaged in coordination efforts for several years and is committed to pursuing joint delivery opportunities as both projects progress</p>	<p>The Applicant welcomes NGLLL's engagement with the Proposed Project which, as stated in their representation, is ongoing and where possible seeks coordination between the two projects. These efforts are reflected in Application Document 7.10 Coordination Document</p> <p>The Applicant has recorded the issues discussed with NGLLL in dialogue to date in a SoCG.</p>

Table 5.6 Applicant's Response to the Relevant Representation of NeuConnect Britain

Reference	Summary of relevant representation	Applicant's Response
5.6.1	The Sea Link project will directly affect upon the operation and management of our organisation, as it will be crossing our HVDC Cable, for which agreement and design will need to be reached.	NeuConnect's comments and the interface between the two projects are acknowledged. The Applicant will pursue further engagement in order to ensure that appropriate measures are agreed to protect the affected assets.

Table 5.7 Applicant's Response to the Relevant Representation of North Falls Offshore Wind Limited

Reference	Summary of relevant representation	Applicant's Response
5.7.1	North Falls Export Cable Corridor	The Applicant welcomes North Falls Offshore Wind Farm Limited registering its interest in the Proposed Project.

Table 5.8 Applicant's Response to the Relevant Representation of RWE

Reference	Summary of relevant representation	Applicant's Response
5.8.1	The proposed project will cross London Array export cable. What are the proposals for this?	<p>The proposed cable route corridor passes to the east of the London Array Windfarm, it does not cross the export cables from the array, as such no proposals are available for cable crossings.</p> <p>The proposed cable route corridor is documented by APP-023 2.5.3 Work Plans – Offshore.</p>

Table 5.9 Applicant’s Response to the Relevant Representation of Scottish Power Renewables (UK) Limited

Reference	Summary of relevant representation	Applicant’s Response
5.9.1	<p>SPR UK Ltd – Introduction:</p> <p>We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited (“SPR”).</p> <p>SPR is the parent company of East Anglia ONE North Limited, who has the benefit of the East Anglia ONE North Offshore Wind Farm Order 2022 (“EA1N”), and East Anglia TWO Limited, who has the benefit of the East Anglia TWO Offshore Wind Farm Order (“EA2”).</p> <p>SPR have the benefit of a number of option agreements within the Project’s Order Limits and as such is named as an Affected Person in the Project’s Book of Reference (APP-016). As explained in paragraph 2.1, SPR will soon assign the benefit of the SPR option agreements to EA1N and EA2 and anticipate that the majority of the option notices will be served before the close of the Examination.</p> <p>As such, there is a lot of crossover and interactions between SPR’s land interests and the Project, most of which are summarised below and will be expanded on in SPR’s written representation at a later date.</p> <p>SPR has had limited engagement with the applicant during development of the Project.</p>	<p>The Applicant welcomes SPR’s engagement with the Proposed Project and acknowledges its interests and interfaces between EA1N/EA2 and Sea Link.</p> <p>The Applicant has been working with the SPR Project team on the EA1N and EA2 projects from the original connection offers, through the DCO and now preparing for construction. From 2021 the EA1N and EA2 project team have been integral stakeholders who have worked closely engaged with the NGET Project team. There have been regular meetings with the project team where updates have been provided on the progress of the Sea Link project. We have had joint meetings with the SPR project teams where Sea Link has been an agenda item and further meeting where Sea Link and the NGV Lionlink Team have met to discuss the impacts of the proposed connections into the NGET Friston substation have the focus of agenda items. National Grid continue to work with SPR and other developers to ensure we are coordinated in our approach to these projects.</p>
5.9.2	<p>SPR have option agreements in place to acquire the whole or parts of land plots 2/20, 2/17, 2/72, 2/11, 2/15, 2/42, 2/99, 2/57, 2/58, 2/59, 2/60, 2/61, 2/63, 2/64, 2/65, 2/68, 2/69, 2/70, 2/71, 2/38, 2/36, 2/12,</p>	<p>The Applicant is engaging with SPR in respect of the land rights required which is acknowledged overlaps with EA1N and EA2’s Order Limits. As set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project. This document has been superseded by AS-093]. This is to ensure that</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>2/8, 2/13, 2/73, 2/75, 2/82, 2/78, 2/79, 2/55, 2/83, 2/6, 2/5, 2/7. The option agreements are currently in the name of SPR; however, SPR are in the process of assigning these to EA1N and EA2.</p> <p>With regards to the plots listed in paragraph 2.1 above, it is not clear from the Project's documents to date whether the Applicant requires additional rights over this land than has been consented under the EA1N and EA2 development consent orders ("DCOs") and is proposed to be carried out under the EA1N and EA2 DCOs.</p> <p>The Project's DCO should include requirements that National Grid Electricity Transmission (the "Applicant") will not exercise the compulsory acquisition rights they would acquire through the Project's DCO in relation to the construction of the National Grid substation near Friston and associated National Grid realignment works if EA1N or EA2 have already granted the Applicant the rights required to carry out these works as part of EA1N or EA2's DCO.</p> <p>SPR are concerned that the Project's compulsory acquisition powers will override or interfere with SPR's interests over the land and/or delay or prevent the carrying out of construction works and/or maintenance of EA1N and EA2. SPR's interests and rights should be protected in the Project's DCO.</p>	<p>should EA1N or EA2's application in respect of the Kiln Lane substation not be delivered.</p> <p>The Applicant is aware that EA1N/EA2 have exercised some of the Option agreements in respect of the plots identified and confirm they are in the process of updating the Book of Reference in that respect. The Applicants thank SPR for providing relevant shapefiles to confirm the exercise of those options to circumvent the potential delays with HMLR registration.</p> <p>Since there will be some overlap with the current known SPR programme, careful CDM and onsite coordination will be implemented to ensure the works for Sea Link do not negatively impact the SPR construction works.</p>
5.9.3	<p>SPR UK Ltd-</p> <p>There are also several instances where the Project's Book of Reference (APP-016) plots are incorrect and amendments are therefore required. SPR have flagged these to the Applicant.</p>	<p>Upon review the Applicant agrees that the identified plot reference is incorrect, therefore will engage directly with SPR to confirm their interests and details will be updated in the next iteration of the Book of Reference that will be submitted in due course.</p>

Reference	Summary of relevant representation	Applicant's Response
	SPR have been listed in the Book of Reference as an occupier of plot 3/17; however, this is incorrect and SPR do not have an interest in this plot. SPR have flagged this to the Applicant.	

SPR Appendix

Date	Topic	Discussion points
30 September 2022	Initial consultation email	Initial consultation email sent to SPR. The email included a summary document which comprised indicative scheme drawings to help provide some context for the scheme, details of the proposal, and impact on SPR's assets.
October – December 2022	Non-statutory Consultation	A period of non-statutory consultation was held between, the 24 th of October 2022 to 18 December 2022. The consultation introduced the Proposed Project and its background through documentation including a corridor and preliminary routing and siting study.
October – December 2023	Statutory Consultation	Statutory public consultation occurred from the 24 th of October to Monday 18 December 2023. The statutory public consultation provided details of the Proposed Project, along with supporting environmental information, and an update on how the proposals have developed since the last consultation in 2022.
14 th Nov 2023	Sea Link Briefing	Meeting requested by the SPR EA1N and EA2 Project teams to provide a briefing on the NGET Sea Link Project.
22 nd Nov 2023	NGET/SPR Designer Discussion	Meeting between SPR's Architects OPEN (SLR) and NGET Sea Links Landscape and Visual Team and Architects C & W to discuss design principles in the area and the approach to these.
January – March 2024	Drainage e-mail chain	Request for updated drainage information at the Friston Substation site by the project engineering team. Updated drainage information was passed on from SPR designer and design coordination agreed between SPR and NGET regarding drainage.

<i>July 2024</i>	<i>Targeted Consultation</i>	<i>Project update since the close of statutory consultation in December 2023, and further technical and environmental assessments. As a result of this work, changes to the plans were shared.</i>
<i>October 2021 – To Date</i>	<i>Regular Updates</i>	<i>Regular updates on the progress of the Proposed Project provided to SPR as part of the monthly SPR /NGET Friston Substation project calls; however, this was not the sole focus of these meetings.</i>
<i>Feb 2023 – To Date</i>	<i>Sharing Of GIS Files</i>	<i>Design freeze 2, 3 and 4 and the DCO Shape files have been shared from NGET to SPR. SPR's DCO Shape File, Works plans Shapefile and Archaeological Shapefiles have been shared to NGET.</i>
<i>22nd Feb 2024</i>	<i>NGET/SPR/ Open (SLR) Meeting</i>	<i>NGET and SPR had a meeting with the SPR Architects OPEN (now SLR), the Sea Link project was discussed as an interaction with the substation at Friston and the Landscaping at this meeting</i>
<i>23rd April 2024</i>	<i>NGET /SPR Lands workshop</i>	<i>Lands workshop at SPR offices London to discuss the Friston Substation land requirements. Sea Link land interactions were discussed at this meeting. Discussion was around how SPR would let land they had under option be accessed by NGET for the purpose of Sea Link</i>
<i>24th April 2024</i>	<i>SPR /NGET /NGV – Friston Screening / Cable Route Discussion</i>	<i>A meeting to discuss the cable route into Friston and the effect of the cable routes on the SPR Screening.</i>
<i>21st May 2024</i>	<i>NGET/ NGV/SPR Workshop</i>	<i>Meeting at the Clermont Hotel in London facilitated by the NGET team to discuss Friston and the interaction of the NGET Sea Link and NGV projects. Item 3 on the agenda was Sea Link specific item to discuss the cable routes and how this would interact with the landscaping and mitigation at Friston.</i>
<i>11th July 2024</i>	<i>NGV /SPR /NGET Call Before LPA Call</i>	<i>Call to have an internal chat before the Local Planning Authority call with regards to landscaping. Covering the interaction of the Sea Link and Lionlink Projects with the SPR mitigation and landscaping.</i>
<i>22nd July 2024</i>	<i>EA2/EA1N SPR National Grid Environmental Interface Meeting</i>	<i>Discussion of the environmental interface at Friston and with the Sea Link team, specific discussion on a potential veteran tree on the Access road which had been differently classified between the project teams for Sea Link and SPR</i>

23 rd July 2024	NGET/SPR Landscape Meeting	Meeting between NGET and SPR landscape teams to discuss landscape proposals at Friston, specifically the SPR updated landscape design at Friston and differences from the consented outline landscape design for EA2/EA1N.
25 th July 2024	NGET /SPR Sea Link Archaeological Works Interface	Discussion on our Sea Link Trial Trenching for our cable route with SPR's team and any overlap with work previously done and any lessons learnt by SPR while carrying out their trial trenching.
30 th Sept 2024	NGET/NGV/SPR Landscape Masterplan Discussion & Mitigation	SPR hosted a virtual meeting with representatives from NGET Sea Link and NGV Lionlink to discuss Landscape Masterplan design and how this will be impacted by the future projects.
Sept 2024 – to Date	Project Director / Senior Manager Meetings	Meeting between the SPR and NGET Senior managers to discuss the Friston project. Sea Link was discussed at most of these meetings as part of the agenda.
22 nd Jan 2025	SPR/NGET Meeting	Meeting between NGET and SPR at the Sea Link project office to discuss Friston and Sea Link. Agenda Item on the Program – specific discussion around Sea Link
12 th Feb 2025	SPR/NGET/NGV Community Engagement Run Through	SPR are carrying out Stage 1 community engagement at the substation, with the focus on landscaping. The date is 24 th February. Whilst NGET and NGV attendance is not required, we need to provide you a run through and get feedback on what we can and can't say about your projects. The community will ask us a lot of questions about Sea Link and Lionlink. Our graphics that we use for engagement will show NGET and NGV projects.
26 th March 2025	SPR/NGET	Meeting between NGET and SPR hosted by SPR at the Novotel Blackfriars to discuss Friston. Sea Link program item on the agenda.
24 th June 2025	Substation Masterplan Design Discussions	SPR held a meeting with East Suffolk and Suffolk councils along with the Design Council to discuss the design at Friston of all of the substation. NGET supported this remotely to answer and NGET / Sea Link questions.
16 th July 2025	NGET/SPR Landscape Meeting	Meeting between NGET and SPR to discuss the status of the SPR detailed landscape design and Sea Link interaction. Discussions around differences between Sea Link Scenario 2 landscape plans and evolving SPR detailed landscape design.
23 rd July 2025	SPR/NGET	Meeting between NGET and SPR hosted by NGET at the Novotel Blackfriars to discuss Friston. Sea Link program item on the agenda. Limited attendance from

		<i>NGET and some areas of SPR due to Sea Link DCO Training and SPR Public consultation on the 24th July 2025 in Suffolk</i>
<i>24th July 2025</i>	<i>SPR Public Consultation Snape Malting</i>	<i>At the request of SPR, NGET attended the Stage 2 consultation of their landscape, drainage and Architectural design event at Snape Maltings to discuss the NGET Friston Substation and the Sea Link interaction with the SPR Landscaping. NGET and NGV had provided a drawing which was shown to the public showing what the possible future of Friston would look like.</i>
<i>7th Aug 2025</i>	<i>NGET/SPR Landscape Meeting</i>	<i>Meeting between NGET Landscape and SPR Landscape teams to discuss the updated SPR landscape design at Friston and interaction with Sea Link with a specific focus on Sea Link and Lionlink cables..</i>
<i>22nd Oct 2025</i>	<i>NGET /NGV /SPR Architectural and Landscape Meeting</i>	<i>Meeting Hosted by NGET in Edinburgh to discuss the ongoing design of the SPR Landscape and Architectural treatment of the Friston Substation and the interaction of the Sea Link and Lionlink cables into the Friston Substation</i>
<i>23rd Oct 2025</i>	<i>NGET / SPR Lands Meeting</i>	<i>Meeting hosted by NGET in Edinburgh to discuss the Friston Land requirements and the Sea Link land requirements in land owned or under option to SPR.</i>
<i>28th Oct 2025</i>	<i>SPR Public Consultation Snape Malting</i>	<i>At the request of SPR, NGET attended the Stage 3 consultation of their landscape, drainage and Architectural design event at Snape Maltings to discuss the NGET Friston Substation and the Sea Link interaction with the SPR Landscaping.</i>
<i>31st Oct 2025</i>	<i>SPR / NGET Cable Crossing Meeting</i>	<i>Meeting to discuss the crossing of the SPR cables with the NGET HVDC Cables and how this can be achieved. Further information is needed by both parties , requests will be made for this information and a further meeting set up to finalise the detail.</i>

Table 5.10 Applicant’s Response to the Relevant Representation of Sizewell C Limited

Reference	Summary of relevant representation	Applicant’s Response
5.10.1	<p>General:</p> <p>Sizewell C Ltd would like to register an interest in the Sea Link DCO project put forward by the National Grid and notify PINS of our initial concerns and observations through the relevant representation process. There is no objection in principle to the Sea Link project but there are some significant omissions in the submitted documents regarding SZC’s offshore activities in particular, which need to be resolved.</p> <p>Sizewell C (SZC) is a consented Nuclear Power Station facility, currently under construction, to be operated by Sizewell C Ltd. The SZC Main Development Site (MDS), including the SZC Harbour Authority Area, is approximately 5km to the north of the Marine Order Limits of Sea Link, off the Suffolk coast (see Figure 1)</p>	<p>The Applicant notes Sizewell C’s (SZC’s) role and area of jurisdiction.</p>
5.10.2	<p>Cumulative Effects: Main Issues</p> <p>The SZC marine activities are not accounted for in the Sea Link DCO</p> <p>The assessment of cumulative effects in Sea Link’s application notes that there will be simultaneous marine installation activities taking place between Sea Link and other nearby marine projects. However, the Sea Link application does not appear to acknowledge SZC’s offshore presence (other than the Order Limits shown in Figure 1 above and one mention of the cooling input pipelines – more detail on this below). This is despite SZC falling</p>	<p>The Applicant acknowledges this omission and will account for SZC’s marine activities in all subsequent work, and update any relevant maps to include the SZC Harbour Authority Area.</p> <p>The Applicant acknowledges that SZC’s main offshore facilitates and activities, all of which are consented under DCO, include the construction or maintenance of:</p> <ul style="list-style-type: none"> ● Permanent Beach Landing Facility (BLF); ● Temporary Marine Bulk Import Facility (MBIF); ● Cooling Water Tunnels;

Reference	Summary of relevant representation	Applicant's Response
	<p>within the 10km Study Area around the offshore scoping boundary that has been used for Sea Link's ES chapter on 'Other Sea Users', which should provide a worst-case scenario, inclusive of the maximum Zone of Influence (ZOI) for the project. Figure 2 below shows the Sea Link Study Area with the approximately location of SZC added.</p> <p>The offshore activities and associated vessel movements to and from SZC are substantial, such that it has been necessary to establish a Sizewell C Statutory Harbour Authority. The fact that there is no assessment by National Grid on SZC's marine activities or vessel movements is therefore a serious concern.</p> <p>SZC's main offshore facilities and activities, all of which are consented under the SZC DCO, are summarised in Table 1.</p>	<ul style="list-style-type: none"> • Desalination Intake Pipe; • Desalination Outfall Pipe; • Fish Recovery and Return (FRR) Systems; • Combined Drainage Outfall (CDO); and • Dredging and Disposal.
5.10.3	<p>Marine Activities:</p> <p>The extent of the marine activities at SZC is such that it is required to set up a Sizewell C Statutory Harbour Authority, consented with the DCO, to facilitate the safe delivery of construction materials to site and ensure the safe construction of the offshore elements. The Sizewell C Harbour Area exceeds the offshore Order Limits for SZC (shown in Figure 1), the coordinates for which can be found in Schedule 20 of the SZC DCO. The Harbour Area includes the full extent of the offshore works, including the cooling water intake and outfalls 3km offshore, but also allows for the safe passage of barges and accompanying tugs to the permanent BLF. The disposal of dredged material will be within</p>	<p>The Applicant acknowledges this omission, and is now consulting with SZC and the SZC Harbour Authority as key stakeholders. An initial meeting was held on 10 September 2025 there is no significant impact to Sizewell C offshore operations and that the proposed updates to the chapters and NRA (to be submitted at Deadline 1) are sufficient to address concerns raised in SZC relevant Report, whilst continuing to engage with SZC Harbour Authority as a shipping and Navigation stakeholder.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>the Sizewell C temporary disposal site, which lies within the Sizewell C Harbour Area.</p> <p>Due to its proximity to the Sea Link northern Order Limits, SZC's marine activities should be considered in the Sea Link DCO.</p> <p>However, the Sea Link submission appears to overlook these activities, aside from a passing mention of the cooling water intake and outfalls. Given potential overlaps in marine construction activities, this omission is significant and requires meaningful consultation between National Grid and SZC, as well as direct contact with the established SZC Harbour Authority, to avoid potential conflicts.</p>	
5.10.4	<p>Shipping and Navigation:</p> <p>At the EIA Scoping stage, Sea Link tried to scope out displacement resulting in increased vessel-to-vessel collision risk between third-party vessels during the construction, maintenance and decommissioning phases. However, the Planning Inspectorate (PINS) and the Maritime and Coastguard Agency (MCA) advised against this, citing a lack of supporting data and the need to complete a Navigation Risk Assessment (NRA) first. Sea Link has submitted an NRA for examination which will now be subject to scrutiny.</p> <p>However, the Sea Link documents regarding shipping and navigation do not acknowledge the offshore works and movements associated with SZC, despite it falling within the 10 nautical mile (NM) study area. Neither the submitted NRA nor the Collision Risk Assessment (CRA), which is summarised in the NRA, include engagement with</p>	<p>The Applicant acknowledges the need to consider the offshore works and vessel movements associated with SZC.</p> <p>The Sea Link Navigational Risk Assessment (NRA) (Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]) will be updated to include consideration of SZC Harbour Authority Area. The Applicant also held a Hazard Workshop with SZC before the start of Sea Link Examination phase to discuss potential concerns surrounding shipping and navigation in more depth and log them, to feed into the NRA.</p> <p>The SZC Relevant Representation refers to the Sea Link CRA, but the Applicant enquires whether this a perhaps a typo, because a CRA has not been undertaken or documented within the NRA for Sea Link. A Formal Safety Assessment (FSA) approach has been followed to assess shipping and navigation risks, and presented as a subsection within the NRA. Any updates to the Sea Link NRA in light of offshore works and vessel movements associated with SZC can expect to also include updates to the FSA section of the NRA.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p>or consideration of SZC (including as a Statutory Harbour Authority) and the risks associated with shipping and navigation to aid SZC's construction. This omission is particularly important as large vessel movements to and from SZC will cross the proposed route of the Sea Link project</p>	
5.10.5	<p>In its DCO, SZC prepared an outline Vessel Management Plan (oVMP) (Ref. 9.65 / 10.23) that shows likely vessel routes travelling to and from the SZC development site – approval of the finalised plan by the Marine Management Organisation constitutes Condition 28 of the Deemed Marine Licence. The oVMP shows that SZC will use ports to the south of the development site (for example, Harwich) and vessel routes will directly interact with the proposed cable route. There is the likelihood of significant interaction / overlap of vessels for the proposed project and those supporting the construction of SZC. There does not appear to be any detail as yet of the offshore construction or vessel routes for Sea Link and so, it cannot be guaranteed that there will be no conflict with SZC</p>	<p>The Applicant acknowledges the production of the SZC oVMP, and will reference it in any updates to the Sea Link NRA (Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]).</p> <p>SZC site and construction works will require vessels to pass through the Offshore Scheme area to reach the SZC Main Development Site. The construction may overlap temporally with the Proposed Project construction works, and so SZC-bound vessels will therefore potentially be required to route around Sea Link vessels during the installation activities. However, given all installation activities associated with the Proposed Project will be transient through the areas where SZC traffic will transit, and there will be no extended disruption at any one point, this will not require a permanent change to the proposed routes. This is assessed in Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203].</p>
5.10.6	<p>There does not appear to be any detail as yet of the offshore construction or vessel routes for Sea Link and so, it cannot be guaranteed that there will be no conflict with SZC. The Sea Link oOCEMP states at para. 1.11.32 that: <i>“A Navigational Installation Plan (NIP) will be developed post submission prior to offshore construction. The NIP provides a mechanism to ensure effective communication and coordination between the Project and all relevant shipping and navigation stakeholders, including port</i></p>	<p>The Applicant acknowledges SZC's offshore proposals to aid construction of the Nuclear Power Station.</p> <p>The Applicant has submitted a draft Outline NIP (Application Document Ref AS-104) to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. The Applicant will continue to engage with the key shipping and navigation stakeholders to update and refine the Outline NIP through the pre-Examination and Examination phases.</p>

Reference	Summary of relevant representation	Applicant's Response
	<p><i>and harbour authorities, Traffic Separation Scheme (TSS) operators, and other offshore projects. This will maintain ongoing awareness of Offshore Scheme installation fleet activities during the construction phase amongst relevant parties, set out planned protocols, and enable coordination with stakeholders as required.”</i></p> <p>Given Sea Link is predominantly an offshore project, developing a NIP prior to offshore construction seems too late given the existing and proposed activities in this stretch of the southern North Sea / northern English Channel. We therefore submit this relevant representation to ensure there is no conflict between marine construction routes or cumulative environmental impacts, particularly as the majority of construction vessels for SZC will be coming from the south. At present, it is not clear that Sea Link is aware of SZC's offshore proposals to aid construction of the Nuclear Power Station as only onshore elements of SZC are mentioned in Sea Link's cumulative effects assessment.</p> <p>Given the construction programmes of both projects will certainly overlap, this is of significant concern.</p>	<p>The Applicant have taken on board SCZ's concern relating to cumulative impacts and have updated APP-082 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users to include an assessment of impacts during all phases on SZC construction and operations to be submitted at Deadline 1. Offshore aspects have been assessed separately to onshore, in APP-083 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects and APP-084 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects</p>
5.10.7	<p>In light of the above, we request that protective provisions for construction activities and vessel movements are included in the Sea Link DCO, to safeguard the rights, interests and operations of SZC, such that SZC is not unduly compromised by the Sea Link DCO. Protective provisions for SZC were recently included in Scottish Power Renewables' (SPR) East Anglia One North (Ref.</p>	<p>The Applicant notes this request and finds the matter as a subject for further discussion and engagement between the Applicant and SZC. The Applicant will work with SZC and other key shipping and navigation stakeholders to find agreement on potential protective provisions if necessary.</p>

Reference	Summary of relevant representation	Applicant's Response
	EN010077) and East Anglia Two (Ref. EN010078) Offshore Windfarm DCOs, which may be of use.	
5.10.8	<p>Onshore Traffic Impacts:</p> <p>SZC are seeking clarification on Sea Link proposals at the A1094 / B1069 junction; the junction has been identified within the red line boundary, but the proposals are unclear. SZC looks to proactively engage with the community on traffic impacts (traffic, highway works and AILs). We would encourage Sea Link to engage with ourselves, SPR and the local community on transport matters, and would welcome their future involvement in our existing transport forums.</p> <p>Consequently, we submit this relevant representation to highlight the extent of the offshore works associated with SZC and the omission in the Sea Link documents of any meaningful consideration of these works or their cumulative effects, including the substantial shipping and navigational movements to and from SZC, crossing the path of the Sea Link project. We would also welcome future discussions with Sea Link on on-shore traffic impacts at relevant stages of their project</p>	<p>The Applicant will engage further with SZC and SPR in order to clarify the proposals at the A1094 / B1069 junction. Similarly, the Applicant is maintaining dialogue with the Local Highways Authority and the Suffolk Constabulary with regard to vehicular movements and AILs. The junction widening works at the A1094/B1069 are comparable with the works proposed by SPR and the Applicant will work with SPR to minimise impacts from the delivery of these works. The junction widening and vegetation management at the junction is to enable the use of the junction by AIL vehicles including cable drums delivery vehicles.</p>

Table 5.11 Applicant’s Response to the Relevant Representation of Thanet BBEC OFTO

Reference	Summary of relevant representation	Applicant’s Response
5.11.1	Thanet OFTO asset protection - crossing our cables both on land and on the seabed.	Thanet BBEC OFTO comments and the interface between the two projects are acknowledged for both the marine and land crossings. The Applicant will pursue further engagement in order to ensure that appropriate measures are agreed to protect the affected assets

Table 5.12 Applicant’s Response to the Relevant Representation of Riveroak Strategic Partners Ltd

Reference	Summary of relevant representation	Applicant’s Response
5.12.1	<p>We act for Riveroak Strategic Partners Ltd, and although they have not been invited to make a representation would like to do so if possible as a sort of interested party. The representation is as follows: Riveroak Strategic Partners is the authorised undertaker for the Manston Airport Development Consent Order 2022. This contains compulsory acquisition powers that overlap with those of the Sea Link project. In particular, Sea Link land plot 3/90 overlaps with Manston plots 185 (subsoil acquisition) and 187 (acquisition of rights of access). While it is likely to be the case that the two projects can co-exist, this will need to be negotiated.</p>	<p>The Applicant welcomes Riveroak Strategic Partners Ltd’s engagement with the Proposed Project.</p> <p>Sea Link Plot 3/90 is the access route to the hoverport in Kent over which Sea Link are seeking Class 5 compulsory rights of access. It is also detailed as Special Category Land (Open Space) in the Sea link application.</p> <p>It is not intended that Sea Link’s proposed use of the access road will be exclusive (and no physical works are proposed) and therefore the Applicant is confident the two projects can co-exist.</p> <p>The Applicant has contacted Riveroak Strategic Partners to discuss their programme and proposed physical works, and to agree terms that will provide suitable assurances for assets and land rights over the lifetime of the Proposed Project.</p>

Table 5.13 Applicant's Response to the Relevant Representation of Port of Tilbury London Ltd.

Reference	Summary of relevant representation	Applicant's Response
5.13.1	Vessel: Effect to the vessel calling the Thames and Port of Tilbury	Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203] assesses the potential for disruption to shipping and navigation from the Proposed Project.

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