



Sarah Holmes, Lead Member of the Examining Authority

Cc. National Grid Sea Link team

Via email only

17th November 2025

Dear Ms Holmes

**Re: Application by National Grid Electricity Transmission for an Order granting Development Consent for the Sea Link Project EN020026 Submission in advance of Issue Specific Hearing 1 on the Scope of the Development**

Thank you for the Agenda and Supplementary Questions for ISH1 and for helpfully publishing these in advance of the normally required timings. We can confirm that we will not need to attend the first Hearing but hope that the following comments are of use to the Examiners and can be considered as well as our submissions in lieu of attendance on key Agenda items. Please note that we will be covering all of the points in our submissions in lieu of attendance in further detail in our Written Representations and that we have copied this letter to the Applicant.

Comments on the Supplementary Questions

In relation to the subject of HDD, we would be grateful if an addition to the Supplementary Questions could be considered.

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Given the concerns around the noise assessments, it would be helpful if the Applicant could also be requested to provide the original noise modelling reports and noise contour maps for the HDD operations, which the Design Development Report Appendix A Landfall HDD Feasibility Technical Note suggests were produced by Atkins.

### Comments on provision of any new Environmental Information

As mentioned, we are grateful to the Examining Authority for the Supplementary Questions especially those which will help all to understand the development scope as well as providing clarity for a number of areas. However as acknowledged by the Examining Authority at the start of the document, answering these important questions may include “the submission of additional information/ evidence”.

We note the deadline for these answers is a week after the deadline for Written Representations. Whilst we appreciate that the timetable is still being finalised and there may be a chance to comment on those answers factored in, we wanted to suggest it may be more helpful to the Examiners to set the Written Representations deadline for after those answers are received so any additional information, clarification etc. can be taken into account.

In addition, we wanted to highlight the potential need for further processes including a consultation should any additional information/evidence be Environmental Information, as required by Regulation 20, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

### Submissions in lieu of Hearing attendance

#### Item 4. Update on related projects - Co-location in Suffolk

Whilst the RSPB is supportive of the principle of trying to reduce impacts through project co-ordination, we are extremely concerned that, co-location of Sea Link with other projects (e.g. Lion Link) within the Leiston-Aldeburgh SSSI and the RSPB’s North Warren Reserve, could cause significant additional ecological impacts. Our main concerns around co-location are related to the potential for increased duration of the works, additional infrastructure required

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for construction, impacts of the increased width of the cable corridor through the site and the increased level of risk associated with any cable failure/faults.

*Item 6. Trenchless landfalls - Trenchless techniques at the Suffolk landfall*

We remain concerned that any failure of trenchless techniques could lead to subsequent Change Applications or other applications to facilitate open-trenching (as these options are not assessed within the current documents). This would be of major concern because works to install a cable via open-trenching, along with the associated haul route and vehicle movements, could cause long-term damage to coastal and wetland habitats (including ditches) which support interest features of the Leiston-Aldeburgh SSSI (and are significantly outside the envelope of the current Environmental Impact Assessment). We therefore seek reassurance and a commitment from the Applicant that open-trenching across the SSSI would not be pursued in any circumstances. For clarity, we also request that the Draft DCO at Schedule 16, Part 2, Para. 10 (3) is updated to include the word 'seaward':

*"No [seaward] exit to trenchless landfall techniques must occur within 50m of MLWS at Leiston to Aldeburgh SSSI."*

This is to ensure protection of the SSSI, particularly should it be necessary to reverse the drilling process such that the landward HDD compound to the west of RSPB North Warren and the Leiston-Aldeburgh SSSI becomes the exit point (as discussed in APP-321 Design Development Report Appendix A Landfall HDD Feasibility Technical Note).

We also note that some risks exist around the use of trenchless techniques at the Suffolk landfall which could affect the Leiston-Aldeburgh SSSI and/or the Sandlings SPA. In summary, points that in our view have not been fully addressed by the Applicant and which we will address further in our Written Representations include:

- A query around the confidence that HDD feasibility is not likely to be affected by the presence of gravel or London Clay
- Potential impacts of the drill freeing process should the drill head become stuck and lack of information about related mitigation measures

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- The need to consult the RSPB and NE on the drilling fluid breakout plan relating to the SSSI
- Clarity requiring any potential need for dewatering at HDD launch pits and resultant potential hydrological impacts on the SSSI
- Query around the likelihood of occurrence of cable faults and the impacts of cable fault remedial action (including additional cable pulling)
- The need for an assessment of the likely impacts of additional duct installation and of the risks and remedial procedures in the event of an empty cable duct collapsing or becoming unsuitable for use.

#### Item 6. Trenchless landfalls – Noise assessment assumptions (Suffolk)

We recommend that it is clarified that the noise thresholds proposed within the Habitats Regulations Assessment (HRA) refer to impulsive noise, represented by dB L<sub>Amax</sub>. The HRA also refers to mapped contours in Appendix E Fig. 3. The meaning of the mapped 'average L<sub>Amax</sub>' contour should be clarified. We also seek reassurance that the map 'for the project as a whole' represents the worst-case scenario for impulsive noise and not an average level for the duration of the whole project. As contours have been calculated for all phases of the work, these should be made available to the Examination. We also recommend that consideration is given to chronic noise levels, represented by dB L<sub>Aeq</sub>, as this has been shown to affect densities and distribution of breeding birds.



The HRA also states an assumed 10dB reduction in noise levels due to best practice measures being employed. It would be helpful if the Applicant could specify the noise modelling guidance around this assumed mitigation and to comment on the safety of the assumption, including any circumstances where this could be difficult to achieve.

In addition, we request that a report of the noise modelling carried out by Atkins is made available to be considered as part of the Examination documents.

#### Item 6. Trenchless landfalls – Mitigation at the Suffolk landfall

The Register of Environmental Actions and Commitments (REAC) includes measure B23 which requires "*Best practical means such as noise fencing or similar effective noise reduction methods...*" but does not confirm when these

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crucial measures would be in place. Please could this be asked of the Applicant noting that for the mitigation required by measure B23 (such as acoustic fencing) to be effective it must be constructed at the beginning of the construction period. If there is a period where construction is taking place without these mitigation measures in place, the assessment of noise impacts could be under-precautionary as the noise contour modelling reported in the HRA appears to be based on the assumption that mitigation is in place. We also recommend that more specific measures are proposed, which should include identification of further mitigation should noise modelling indicate that thresholds have been exceeded. The Landfall HDD Feasibility Technical Note explains that enclosing the HDD rig in an acoustic shed would potentially reduce noise impacts; we therefore suggest this should measure be included in the proposed mitigation.

We also recommend that bird distribution should be monitored during construction to indicate whether any changes are occurring and again, help to inform any need for further mitigation.

#### Item 6. Trenchless landfalls – Further works within Suffolk designated sites

The exact nature of access routes at the RSPB's North Warren Reserve and Leiston-Aldeburgh SSSI, along with any works required to facilitate it, should be made clear, and potential impacts will require proper assessment, and we predict mitigation too. It should be clarified that no surfacing of access routes is proposed within those sites. We also request clarity on the exact scope of vegetation management proposed within the RSPB reserve and SSSI and note that suitable mitigation would be required to protect Schedule 1 species. We also request clarification of the circumstances which might require emergency access and the methods and equipment required, also of how the Applicant proposes to be able to reach all parts of the cable route in the event of a fault, and what effect this could have on habitats within the RSPB reserve and SSSI.

We are also concerned regarding the potential presence of UXO and any need for excavations within RSPB reserve and SSSI related to cable drilling or any other associated works. A method statement and assessment of potential damage to habitats and disturbance to the SSSI and the nearby Sandlings SPA from any detonations required should be provided.

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## Item 6. Trenchless landfalls -Trenchless techniques in Kent

We welcome the confirmation that open-trenching has not been included as a fall-back option within the draft DCO, for example in ES Part 3 Kent, Chapter 2 Ecology and Biodiversity, 'HVDC cables would be installed using a trenchless technique at the landfall to avoid direct impacts on Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay SAC (B42).' We remain concerned, however, that open-trenching could take place in the intertidal zone as mentioned in 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology, and that any failure of trenchless techniques could lead to subsequent Change Applications or other applications to facilitate open-trenching. This would be of major concern because works to install a cable via open-trenching, along with the associated haul route and vehicle movements, could cause long-term damage to coastal and wetland habitats which support SSSI/SPA/Ramsar interest features (and are significantly outside the envelope of the current Environmental Impact Assessment). We therefore seek reassurance from the Applicant that open trenching across the SPA would not be pursued in any circumstances. This concern is heightened by the long-term damage caused to habitats at Pegwell Bay due to the Nemo Link infrastructure project that used trenching, after commitments had been given that it would be using trenchless techniques, and we wish to ensure there is no risk of a similar situation occurring with Sea Link.

We also note that some risks exist around the use of trenchless techniques at the Kent landfall which could affect the Thanet Coast & Sandwich Bay SPA, Sandwich Bay SAC and/or Sandwich Bay to Hacklinge Marshes SSSI. In summary, points that in our view have not been fully addressed by the Applicant and which we will address further in our Written Representations include:

- How installation across the intertidal zone would avoid or mitigate disturbance to the nationally significant waterbird assemblage around the Stour Estuary, and the need to avoid trenching across all of the SPA
- Potential impacts of the drill freeing process should the drill head become stuck and lack of information about related mitigation measures
- The need to consult NE and Kent Wildlife Trust on the drilling fluid breakout plan relating to the designated sites
- Query around the likelihood of occurrence of cable faults and the impacts of cable fault remedial action (including additional cable pulling)

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- The need for an assessment of the likely impacts of additional duct installation and of the risks and remedial procedures in the event of an empty cable duct collapsing or becoming unsuitable for use.

Should you wish to discuss any of the issues raised in this letter with us in further detail please do not hesitate to contact us.

Yours sincerely



RSPB Senior Conservation Officer, Suffolk

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