

The Examining Authority

5 December 2025

South East Anglia Link Project (EN020026)

c/o The Planning Inspectorate

Via email: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Examining Authority,

Re: Notice of Intention to Apply for a Wasted Costs Order – Sea Link EN020026

We write further to our letter of 27 November [\[AS-149\]](#) to give formal notice that we intend to apply for a wasted costs order on the basis that actions by the Applicant have resulted in additional and avoidable expense for Interested Parties during the Examination.

As outlined in our earlier correspondence and as reflected in material submitted to the Examination, we have experienced difficulties arising from the timing, completeness, and accuracy of certain Applicant submissions. These issues have complicated our ability, and that of other community groups, to engage effectively with the Examination process.

In particular, we note:

- A significant number of documents that were not submitted by Deadline 1, with further material provided well after that date.
- Missing or incomplete documents referenced within the Applicant's submissions, including material such as the Cultural Heritage Appendix.
- Errors, mis-citations, and omissions that have made it challenging to verify and analyse the information relied upon.
- The Examining Authority's Rule 17 letter of 28 November 2025, which refers to instances where submissions were late, incomplete, inconsistent, or contained inaccuracies, and highlights that such circumstances may give rise to unnecessary or wasted expense for other parties.

These matters, taken together, have required Interested Parties to undertake additional work to review, cross-check, and seek clarification of documents, resulting in costs that we believe could reasonably have been avoided.

In line with the *Award of Costs: Examinations of Applications for Development Consent Orders – Guidance*, we consider that the test for unreasonable behaviour may be met in this case. We therefore give notice of our intention to apply for a wasted costs order and will provide a full schedule of costs and supporting evidence in due course.

Yours faithfully,

Fiona Gilmore

For and on behalf of

SEAS IP: [REDACTED]