

**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) – RULE 8**

**APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION FOR AN
ORDER GRANTING DEVELOPMENT CONSENT FOR THE SEA LINK PROJECT**

APPLICATION REF: EN020026

SUBMISSION DEADLINE: 9th December 2025

**COMMENTS OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION
FOR ENGLAND (HISTORIC ENGLAND) ON FURTHER INFORMATION/
SUBMISSIONS RECEIVED BY DEADLINE 1 AND DEADLINE 1A**

REGISTRATION ID: [REDACTED]

Historic England has previously provided Written Representation which set out our views on the proposed Development Consent Order (DCO) application made by National Grid Electricity Transmission for the proposed Sea Link project.

We outlined that Historic England do not object in principle to the Proposed Development. However, further information and documents are required to establish significance of historic environment and define appropriate programme of mitigation.

We have since been notified that further information related to the project has been submitted by the procedural deadline 1 and deadline 1A (as outlined in Rule 8 letter). The Examining Authority has made the decision to accept these additional documents into the Examination.

Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this further information. Our comments should be read in conjunction with our Written Representation dated 18th November 2025.

Comments on draft Development Consent Order (Clean) – Applicants document reference: 3.1(E); PINs Examination Reference: REP1-036

We continue to have some concern surrounding the design commitments presented in the Draft DCO Schedule 3 Requirements ‘3 Converter Station Design’ and ‘14 Archaeology’ as drafted, as they make no explicit provision for stakeholder engagement on the heritage issues beyond the local County Council.

We recommend that an appropriate wording is added to the draft DCO to enable engagement with Historic England on the heritage issues. This is important to ensure post consent works are appropriate.

Additionally, we note that the document ‘Outline Offshore Overarching Written Scheme of Investigation (**PINs Examination Reference: PDA-033**) is referenced within Part 1, Article 1(1) of the DCO as a certified document, but it is not included within the list of certified documents in Schedule 19.

Similarly, the ‘Outline Onshore Overarching Written Scheme of Investigation’ for Kent (**PINs Examination Reference: REP1-104**) and Suffolk (**PINs Examination Reference: APP-343**) are both referenced within Part 1, Article 1(1) of the DCO as a certified documents, but are not included within the list of certified documents in Schedule 19.

We recommend that omitted documents should be added to the list of certified documents in Schedule 19.

Comments on Part 4 Marine Chapter 6 Marine Archaeology – Applicants document reference: 6.2.4.6 (B); PINs Examination Reference: REP1-057

We note the updated document sets out further details regarding further survey work required for Pegwell Bay (paragraphs 6.4.21-22) and future UXO surveys (paragraph 6.4.60).

We welcome inclusion of the details of these surveys and agree that they are sufficient to address identified baseline data gaps.

Comments on CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) – Applicants document reference: 7.5.3.2 (B); PINs Examination Reference: REP1-102

The commitment referenced in Marine archaeology section (MA09) to secure further surveys only refers the archaeological assessment and interpretation of ‘further surveys’ and not marine surveys identified in Part 4 Marine Chapter 6 Marine Archaeology: 6.2.4.6 (B) (**PINs Examination Reference: REP1-057**) specifically.

Given there is no condition with the draft Development Consent Order (DCO) deemed marine licence (dML) for pre-construction surveys, we would like to understand how these surveys will be secured. We recommend the appropriate mechanism for securing of these surveys should be included in the draft Development Consent Order (DCO) and a revised wording shared with Historic England prior to the end of the examination.

We remain of the view that there is some harm to the significance of Richborough Roman Fort caused by the proposed development within its setting. In order to ensure that this harm is kept to a level which would be considered ‘not significant’, we request that a commitment to further consultation with Historic England on the detailed design of the Minster Converter Station and Substation is secured through the REAC.

In order to address this, we propose the inclusion of a further heritage commitment to the REAC Landscape and Visual section, as follows:

To minimise the change to the setting of heritage assets, the Minster Converter Station and Substation is to be designed in consideration of limiting intrusion into Heritage key views and in consultation with Historic England.

We recommend the revised wording of the REAC is shared with Historic England prior to the end of the examination and confirmed with the examining authority.

Comments on Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent (Clean) – Applicants document reference: 7.5.4.2 (B); PINs Examination Reference: REP1-104

Historic England welcomes submission of the amended Outline Onshore Overarching Written Scheme of Investigation (OWSI) for Kent. However, we note that some of the comments which have been previously provided directly to the applicant have not been implemented in the current version of the document.

We reiterate these comments for clarity:

- Section 4 should refer to HE guidance for Environmental Remains (2011, update soon to be published), Geoarchaeology (2015) and Animal Bones and Archaeology (2019).
- Paragraph 4.2.19 – please add to the last sentence: ‘and analysis of palaeoenvironmental indicators’.
- Paragraph 4.3.18, 3rd bullet point – undertaking micromorphology on floors/activity surfaces is highly recommended. It is an underused but very effective and informative technique.
- Paragraph 7.1.4 – research aims should also make reference to any previous evaluation results.
- a point should be added for details of re-burial, following recent HE guidance, in case preservation in situ is warranted. Historic England 2024 Preserving archaeological remains. Appendix 5 – The Reburial of archaeological sites. HEAG100f v2. Historic England. <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>
- Figure 1 - please include more detailed figures of zoned areas with geophysical survey results included.

Separately, we note that (Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies Doc 9.34.2; **PINs Examination Reference: REP1-112**) states under paragraph 3.7.32 that the geoarchaeological works to assess potential hydrogeological impacts of the scheme to buried archaeology will be secured in the Outline Onshore OWSI.

Similarly, paragraph 3.7.33 states that mitigation for ecological impacts from landscaping and BNG designs to buried archaeology will be developed in the relevant OWSI. However, the latest version of the OWSI document does not consider addressing these impacts and mitigation.

We recommend that the additional sections dealing with hydrogeological impacts, and ecological impacts from landscaping and BNG designs, and securing appropriate mitigation are included in the OWSI.

Revised wording of the OWSI should be shared with Historic England prior to the end of the examination.

Comments on Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies – Applicants document reference: 9.34.2; PINs Examination Reference: REP1-112

We welcome commitment by the applicant to providing updated cultural heritage impact assessment of the Suffolk onshore part of the project based on the full results of additional archaeological surveys (paragraphs 3.7.8-3.7.11). We fully support this approach.

We welcome commitment by the applicant (outlined in paragraph 3.7.23) to consult further with Historic England and other stakeholders regarding impacts on the multi-period complex archaeological site on the 'Ebbsfleet Peninsula'.

We have highlighted significance of this non-designated archaeological site in our Written Representation.

We noted that a number of measures have been already implemented by the project to either avoid or mitigate direct impacts. Despite this, some direct impacts on the Ebbsfleet Peninsula complex are likely to remain, and, due to the permanent nature of this harm, it must be considered to be of at least medium magnitude, resulting in a major adverse significance of effect (i.e. one that is Significant). We agree with this part of the assessment presented in the application documents.

However, we continue to disagree that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to 'Minor'. In our opinion, the assessed level of effect after archaeological mitigation does not present a full and accurate picture of the potential harm caused by the works. This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.

Therefore, if there are any options for further reducing harm by removing site compounds or utilising non-dig options, these would likely be preferred. However, we understand that no-dig

options may often result in the need for top-soil remedial works, which may then be as harmful as the proposed top-soil stripping for compound locations. Potential options for reducing harm in sensitive locations will therefore need to be discussed further.

The paragraph 3.7.29 states that the applicant understands that Historic England's advice in relation to geoarchaeological assessments and deposit models only applies to Kent Onshore part of the scheme.

We have provided detailed comments on the geoarchaeological assessments in Suffolk in our Written Representation. We have identified that there are certain gaps in the understanding and knowledge of the project area. We recommended that these gaps in the understanding are addressed through a programme of geoarchaeology and deposit modelling.

Paragraph 3.7.33 notes that the applicant assumed that there would be no physical impact within the areas of grassland proposed as part of ecological mitigation measures. This has informed approach to proposed mitigation. We would recommend that for the sake of clarity the assumption of no change within these areas is confirmed by the applicant.

Comments on Suffolk and Kent Illustrative Visualisations Part 2 of 2 – Applicants document reference: 9.14; PINs Examination Reference: REP1-297

We have previously highlighted significance of the scheduled monument known as 'A Saxon Shore fort, Roman port and associated remains at Richborough' in our Written Representation. The proposed development is located within the setting of this nationally important Roman site. We are pleased to see that a key illustrative visualisation, i.e. from on top of the Claudian Gate at Richborough Fort, have now been supplied. However, we note though that the use of the 'Rochdale Envelope' has not been employed, which means that the visualisation presented in the document is something of a 'best case' scenario.

The additional visualisations clearly demonstrate that the converter station will intrude views from the amphitheatre towards the fort, and in and around the fort itself. This would have an effect on the legibility of the surrounding landscape and peoples' ability to appreciate the forts historic setting.

The setting of the fort contributes highly towards our understanding of the monument and its original topographic context. Therefore, we continue to maintain that there is a higher level of harm to Richborough Roman Fort than has been assessed by the applicant.

As we previously highlighted in our Written Representation the applicant has assessed the magnitude of harm to the significance of the fort caused by development within its setting (during operation and maintenance) to be 'Negligible' with a resultant 'Minor Adverse' significance of effect (Table 3.14, pg. 65, Doc. 6.2.3.3, Environmental Statement, Part 3 Kent, Chapter 3 Cultural Heritage, **PINs Examination Reference: APP-063**).

On the assumption that appropriate design mitigation will be implemented, utilising the least intrusive of the design principles put forward (as described in Doc 7.11.2 Design Approach Document – Kent, **PINs Examination Reference: APP-365** and Doc 7.12.2 Design Principles – Kent, **PINs Examination Reference: APP-367**), Historic England assess the magnitude of harm to be 'Small' (as per Table 3.10, pg. 31, Doc. 6.2.3.3, **PINs Examination Reference: APP-063**).

According to the methodology used by the applicant (as per plate 5.2, pg. 14, Doc 6.2.1.5, **PINs Examination Reference: APP-046**), this may then result in a 'Moderate' or 'Minor' significance of effect. We consider that a 'Minor' significance of effect is appropriate and that the harm is therefore 'Not Significant'.

Despite our disagreement regarding the specific magnitude of harm, the resultant significance of the effect does therefore broadly align with the applicant's assessment. This is subject however to ensuring that the detailed design of the converter station truly meets the aims set out within the design parameters as currently set out. It should be noted however that if a design is chosen that increases the intrusion of this structure within the landscape, then the harm may be considered 'Moderate' which would then be 'Significant'.

Conclusions

Historic England welcomes submission of additional and revised documents in support of the Sea Link project DCO application.

We have provided comments on this additional information and broadly agree with the applicant's approach to assessment and further mitigation. We have identified areas where further discussions and changes to the submitted documents are needed.

We recommend that the amendments to the draft DCO and Outline Overarching Written Schemes of Investigation should be agreed with stakeholders prior to the finalisation/certification of these documents.

Dr Will Fletcher
Historic England Infrastructure Lead (Sea Link)