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16 December 2025
Your Ref: EN020026
SEAS IPL [REDACTED]

BY EMAIL ONLY: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Ms Holmes,

RE: Comments on Document 9.69, NGET's 'Applicant response to Examining Authority letter dated 28 November 2025 [EN020026]', Ref: AS-151

We are writing to raise serious concerns regarding the accuracy of the Applicant's assertions in [AS-151](#), specifically the claim that all Deadline 1 documents were available to the Planning Inspectorate and the public "within a few hours of the deadline" and that "no parties were prejudiced" by the late upload. Based on our direct experience, this statement is demonstrably incorrect.

SEAS was actively preparing rebuttals to the Applicant's submissions, including Document 9.34, *Applicant's Comments on Relevant Representations* ([REP1-111](#)). SEAS representations were indexed at Table 2.10.1, but in fact appeared at 2.10.20 onwards. We downloaded this document on 27 November 2025, and at Table 2.10.21 the Applicant stated: "The Applicant has prepared a separate report at Appendix 3 Local Alternative...". No such Appendix existed then, nor does an "Appendix 3" exist now. This document is over 750 pages long, and these errors materially hinder navigation and impose unnecessary burdens on Interested Parties.

On 28 November 2025, after we sought clarification, the Case Team kindly provided a link (at 17:29) to a revised version, now titled 9.34.1. This version contained responses to SEAS beginning at Table 2.49. However, the Examination website still displayed REP1-111; the Examination Library still linked to REP1-111; the new document was not signposted or labelled as a replacement; and although the contents page now referred to an "Appendix B – Alternative Sites", the body text still referred to "Appendix 3", and no appendix was included. Only those who had directly contacted the Case Team would have known a corrected document existed.

On 1 December 2025, a further version appeared on the project website. As far as we could determine in the limited time available, the text was unchanged. The erroneous reference to "Appendix 3" remained, although the missing appendix had now been inserted as Appendix B on page 423 — but not linked from the contents page.

This third updated version was uploaded as [REP1A-043](#), while REP1-111 remained in the Examination Library. This meant that the public-facing record still pointed to the incorrect document; the corrected version was not discoverable without prior knowledge; and SEAS

had to notify the Case Team before a replacement note was added to REP1-111 on December 8th, the day before Deadline 2. It is also worth noting that REP1-111 contained 748 pages, whereas REP1A-043 contained 430 pages, and there was no match between the indexed numbers. None of this made it easy to discover and consider the Applicant's supposed rebuttals.

The Applicant's failures extended beyond the Alternative Sites material. On 24 November 2025, SEAS formally requested three appendices referenced by the Applicant, including Appendix A – Suffolk Illustrative Visualisations (Document 9.14), Appendix A – Additional Visualisations (Document 9.48), and Appendix 1 – Cultural Heritage (Document 9.34.1, Table 2.10.23). The Applicant's response to SEAS' Cultural Heritage Relevant Representation explicitly stated: *"See Appendix 1 Cultural Heritage of this document. Each of the points raised in the SEAS relevant representation is addressed within this appendix."* However, no such appendix was provided.

A further revised version of the document — EN020026001736 9.34.1 *Applicant's Detailed Responses to the Relevant Representations identified by the ExA*, including Appendix A: Cultural Heritage – Heritage Impact Assessment — was only published on 28 November 2025. Even then, this version was not clearly signposted, and the Cultural Heritage appendix remained difficult to locate and impossible to identify without prior correspondence with the Case Team. Without this appendix — which the Applicant themselves stated contained their full response to SEAS — it was impossible for SEAS to prepare a complete and fair Deadline 2 submission.

We have also noted that a further version of 9.34.1 ([REP2-014, 9.34.1B](#)) was submitted on 11 December after Deadline 2. This version continues to refer to the unexplained Appendices 1 and 3. For the future, it would be helpful if tracked versions were shown in colour, as the use of black text alone makes it difficult to identify where changes have been made.

We would also like to make it clear that we have no complaints at all with the standards that the case team are maintaining in the face of this barrage of change and delay that the Applicant is causing, and are very grateful for their assistance throughout the Examination so far.

However, the Applicant's assertion that all Deadline 1 material was available "within a few hours" is incompatible with the documented sequence of events. Key elements of their response to SEAS — including the Alternative Sites material and the Cultural Heritage appendix — were not accessible, complete, or discoverable until 28 November and 1 December 2025. These delays materially constrained the ability of SEAS, and likely other Interested Parties, to prepare Deadline 2 submissions in a fair and timely manner. We therefore consider the Applicant's statement in AS-151 to be misleading and respectfully ask the ExA to treat it as such when assessing the procedural integrity of the Examination.

Yours sincerely,

Suffolk Energy Action Solutions (SEAS)