



**The Examining Authority's First Written Questions
Issued on 17 December 2025**

**Answers from the
Royal Society for the Protection of Birds**

**Submitted for Deadline 3
09 January 2026**

Planning Act 2008 (as amended)

In the matter of:

**Application by National Grid Electricity Transmission for the
Sea Link Project**

**Planning Inspectorate Ref: EN20026
RSPB Registration Identification Ref: [REDACTED]**

3. Ecology and Biodiversity

1ECOL26 to the Applicant, Kent Wildlife Trust, Natural England and the RSPB

REAC provision B59 – impacts of potential frac out

Provision B59 of the REAC [CR1-043] allows for the sharing of an HDD landfall method statement and drilling fluid management plan for information with NE only. Confirm whether other parties such as RSPB and KWT should also be party to this provision. Also comment on whether, in light of the potential for impacts on sites for which NE, KWT and RSPB have responsibility, they should also approve or be consulted on these plans. The provision should be updated to explain when these plans should be made available.

RSPB response:

We welcome the measures within REAC provision B59 requiring an HDD landfall method statement and drilling fluid management plan as well as committing to carry out hydrofracture modelling in advance of works. Section 2.2.2.2 of our Written Representations stated that:

“We request that Natural England and ourselves are consulted with regard procedures within RSPB North Warren/Leiston-Aldeburgh SSSI to ensure measures are in place which recognise the sensitivities of the site and difficulties of access and would minimise ecological impacts as far as possible; also that these procedures should include notification of both NE and ourselves of any incidents at the earliest opportunity.”

We therefore agree that the RSPB should approve or be consulted on plans regarding the RSPB’s nature reserve at RSPB North Warren (the Suffolk landfall) sufficiently in advance of construction for our comments to inform methods and mitigation.

In addition, we explained in our Written Representations (again in section 2.2.2.2) that we also consider that a report detailing the outcomes of hydrofracture modelling should be a required Obligation to be discharged before construction commences.

1ECOL28 to the Applicant, Natural England and the RSPB

REAC provision B60 – impacts of potential frac-out

Provision B60 of the REAC [CR1-043] allows for notification of NE and RSPB in the event of a frac-out. In light of the sensitivity of the designated sites, is there a need for a more active role in this provision than currently worded for NE and RSPB? For example, to control routing of spotters and agreement of vehicle use on existing accesses.

RSPB response:

The RSPB welcomed the opportunity to discuss procedures and routes for access relating to monitoring of drill progress and spotting of incidents such as frac-outs with the Applicant at RSPB North Warren on 21st August 2025. Given the usefulness of this conversation for both parties in discussing approaches to access constraints and ecological issues, we agree that the RSPB should continue to have an active role in this discussion. Whilst we acknowledge that provision B60 does require notification of RSPB of any incident and methods proposed and for the Applicant to “*take into consideration any comments received*”, we recommend that the provision be clarified to include prior consultation with RSPB to agree general principles for monitoring and access in the drilling fluid management plan as discussed above and early consultation with RSPB regarding specific access needs in the event of an incident.

1ECOL29 to the Applicant, Natural England and the RSPB

REAC provision B62 - impacts of HDD on Site of Special Scientific Interest (SSSI)
Provision B62 of the REAC [CR1-043] allows for preconstruction botanical surveys to support monitoring of any impact of HDD. Should this provision be to support ‘monitoring and mitigation’ of any impact of HDD, since the location of plants might dictate routes of access and priorities for mitigation amongst other things?

RSPB response:

We raised a concern in section 2.1.7 of our Written Representations that:

“The decision not to survey the vegetation across the [Leiston-Aldeburgh] SSSI does not reassure us that any impacts on the vegetation, including due to proposed access routes or potential incidents such as frac-out, will be reliably understood”.

We therefore support the inclusion of pre-construction botanical surveys at this site. Given the SSSI status of the site and the presence of botanical interest features (also noting their importance in providing supporting habitat and function for bird features), the outputs of any such surveys should be used where appropriate to inform mitigation of impacts of construction on the site, including of potential incidents such as drilling fluid frac-out.