

Response deadline: 19th January 2026

Our ref: PL00785922

Project: The Sea Link Project

Your Ref: EN020026

Registration ID: FEC57596A

Response by: Slawek Utrata

Inspector of Ancient Monuments

Telephone: 01223 582725

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Dear Sir/Madam,

National Grid (Sea Link) Development Consent Order (Application Reference: EN020026)

**Proposed changes to the development consent order application**

Written Representation of the Historic Buildings and Monuments Commission for England (Historic England)

Historic England is the Government's statutory adviser on the historic environment. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment. This extends to sites and places in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Our objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.

Historic England has previously provided written representations regarding the original Development Consent Order application for the Sea Link Project. Our current comments relate only to the proposed changes to the DCO, which were submitted to the Examining Authority on 26<sup>th</sup> November 2025.

We understand that there are five changes proposed by the applicant:

- Change 1: Change to access at the hoverport, Kent
- Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk
- Change 3: Change to the order limits east of Friston to provide flexibility in relation to heritage feature, Suffolk
- Change 4: Change to the order limits at Benhall railway bridge, Suffolk
- Change 5: Increase in area for maintenance of a new hedge to south of B1119

Historic England Advice

Changes 1, 2, 4 & 5

We can confirm that we have been consulted by the applicant on the proposed changes to DCO and we have provided pre-application advice, as outlined in the Change Request Consultation Report [CR1-070].

Historic England can therefore confirm that we have no comments to offer in relation to proposed changes 1-2, and 4-5, as these amendments to the Project will not result in changes to the magnitude of impact on the historic environment.

### Change 3

We have the following comments to make on change 3, which is specifically related to historic environment and proposes to adjust the boundaries of the project to allow for appropriate mitigation of the newly identified archaeological remains.

Geophysical Survey report [CR-057] outlines the results of the additional non-intrusive survey work undertaken in the area where phase 2b of trial trench evaluation [AS-136] identified archaeological feature interpreted as a neolithic henge. Geophysical survey of the wider area surrounding the feature provided additional data which allowed better understanding of the remains. The archaeological site was re-interpreted on the basis of its morphology as a G-shaped enclosure of possible Late Bronze Age.

Historic England considers that this re-interpretation is reasonable in light of the new data. The identified archaeological site is a non-designated heritage asset with archaeological interest. It is of likely regional importance, as assessed in an Addendum to Volume 6 Environmental Statement [CR1-055]. The negative effect on this asset resulting from implementation of the Project, depending on the exact mitigation measures, could be significant.

Addendum to Volume 6 Environmental Statement [CR1-055] outlines that two options for mitigation of archaeological remains in the change 3 area are being considered: re-routing of the cable and haul road corridor to the east to avoid impact on the G-shaped enclosure; and archaeological excavation of the entirety of the G-shaped enclosure to allow for the original route of the cable and haul road.

We note that further intrusive evaluation work is proposed in the area during the winter 2025/26 to confirm the interpretation of geophysical anomalies and to characterise adjacent areas. The obtained data will be used to inform archaeological mitigation strategy. This is welcome; however, the results will likely not be available before conclusion of the examination of the DCO for the project.

Historic England would expect to be consulted by the applicant in the event of the further evaluation identifying additional archaeological remains which could be considered to be of national importance or if new data would lead to re-interpretation of known remains.

The process of further consultation and the implementation of the mitigation measures will need to be appropriately secured in the revised Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]. The document should be amended, however as the impact is on a non-designated heritage assets of likely regional significance we will defer to the LPA and their expert and specialist advisors to provide detailed advice.

We have recommended in our relevant representation that the wording of the DCO Requirement 14 [CR1-27] be changed to ensure that Historic England would be a named party in relation to further consultation. This is in order to manage assessment and mitigation, particularly post consent. This is particularly relevant for this area where the results of the evaluation will not be known at the time of the examination and therefore the mitigation strategy would be established post consent.

### **Summary**

Historic England acknowledges that the proposed changes to the Sea Link DCO, will provide the project with necessary flexibility to respond to the results of the surveys and to address the stakeholder's feedback. We consider the changes would be reasonable within the scope of the project.

If you require clarity or further information on any matters, we have raised in the letter above or have other comments, please do not hesitate to contact us directly.

Slawek Utrata

Email: [REDACTED]@historicengland.org.uk