

## **SEAS Request for Full Disclosure of Relevant Representation AP458**

**SEA LINK: EN020026**

**DEADLINE: 4 – 10 February 2026**

**SEAS IP:** [REDACTED]

**Date: 10 Feb 2026**

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SEAS submits this paper to address a matter of central importance to the integrity of the Examination: the absence of the full Relevant Representation submitted by The King's Most Excellent Majesty in Right of His Crown (AP458). The Applicant has provided only a short, paraphrased summary in *Volume 4. Compulsory Acquisition Information, Document 4.2.2. Statement of Reasons Appendix B Schedule of Negotiations with Land Interests* (REP3-016). Even this limited summary suggests that the Crown has raised serious concerns about the environmental, cumulative, long-term, and financial impacts of the Sea Link project. These concerns go to the core of the Examination and cannot be properly understood or tested without disclosure of the full representation.

This issue has become more pressing because the Applicant has indicated that the summary of AP458 may have been included in error. If the summary does not accurately reflect the Crown's position, then the Examining Authority and Interested Parties may have been relying on information that is incomplete or incorrect. In such circumstances, the Examination cannot proceed on the basis of a paraphrase whose accuracy is uncertain. Only the full text of the Crown's representation can clarify the true nature of His Majesty's concerns.

The importance of this matter is reinforced by the Examining Authority's own intervention at Compulsory Acquisition Hearing 1. Through Action Point 25, the ExA has required the Applicant to provide an update on Crown land consent, the milestones toward agreement, and the implications of failing to secure consent before the close of the Examination. This demonstrates that the Panel recognises Crown land as a material risk to the project's deliverability. Understanding the Crown's actual position is therefore essential.

The concerns attributed to His Majesty in the Applicant's summary are substantial. The Crown is said to have raised deep unease about the environmental consequences of the project, particularly in relation to the Suffolk Heritage Coast, described as an internationally important wildlife haven. The summary also refers to concerns about the cumulative impact of Sea Link alongside Nautilus, EuroLink, LionLink, and Sizewell C, and the lack of strategic oversight across these projects. Further concerns reportedly relate to long-term disruption, including the decades required for lost trees to mature, and to financial loss arising from reduced property values and inadequate compensation principles.

These issues challenge fundamental elements of the Applicant's case. Yet the summary provided does not disclose the Crown's reasoning, the evidence relied upon, or the strength of the objections. It is not clear whether the Crown disputes the Applicant's environmental assessment, cumulative impact methodology, or alternatives appraisal, nor whether it has raised legal or procedural concerns.

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The Applicant's own negotiation history, nearly a year of discussions, unresolved "outstanding principles," and no confirmed Section 135 consent, suggests that the Crown's concerns are substantive and remain unresolved.

Given the constitutional and statutory importance of Crown land, the Examining Authority cannot rely on a paraphrase that the Applicant itself has suggested may be inaccurate. The Crown is not an ordinary landowner; its representation is likely to reflect environmental stewardship duties, long-term land management responsibilities, and a national-level perspective on infrastructure impacts. The full text of AP458 is therefore essential to understanding the nature and extent of the Crown's objections and to assessing the Applicant's case for compulsory acquisition and environmental justification.

SEAS respectfully asks that the Examining Authority direct the Applicant to publish the full text of Relevant Representation AP458, including any annexes or supporting documents, and to explain why only a summary was provided. SEAS respectfully requests that the Examining Authority seek confirmation from the Crown Estate as to whether the Applicant's summary accurately reflects His Majesty's position and that Interested Parties be given sufficient time to review and respond to the full representation once disclosed.

End.