



Planning Inspectorate

Application by National Grid Electricity Transmission for an Order Granting Development Consent for the Sea Link Project.

Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues held on Wednesday 25 March to Friday 27 March 2026. This list also includes questions rolled over from the hearing which could not be asked due to time constraints or to parties who were not in attendance.

Action	Description	Action by	When
General			
1.	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	All parties	Deadline (DL) 6
Water Environment			
2.	Provide a summary of the current position regarding outstanding issues raised at DL5, set out any live flood risk issues that the ExA needs to be aware of, and draft any additional commitments/requirements necessary to mitigate the effects of flood risk.	Environment Agency (EA), Applicant	DL6
3.	Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk.	SCC, Applicant, EA	DL6
4.	Confirm if any wider sustainability benefits to the community are deemed necessary to outweigh flood risk as per NPS EN1, section 5.8.11. In answering, provide full reasoning for your position and, if necessary, drafting for the DCO and/or Register of Environmental Actions and Commitments (REAC) suitable to secure.	SCC	DL6
5.	Joint position statement with respect to all matters relating to the proposed development meeting the objectives of the WFD. In answering confirm position with respect to 5 outstanding matters identified at DL4 – EA040, EA041, EA043, EA045 and EA046.	Applicant and EA	DL6

Action	Description	Action by	When
Traffic and Transport			
6.	Provide a written summary of the A12 works, setting out what is currently happening and what more is planned over the next few years. SCC to also set out if these works could benefit the proposed development, particularly the construction phase.	SCC	DL6
7.	SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6.	Applicant and SCC	DL6
8.	Provide details on how larger vehicles would manage to turn safely at the junction of the A1094 onto B1121 south of Friston. This should include diagrams to show swept paths of larger vehicles including HGVs.	Applicant	DL6
9.	Respond to the submitted document 9.107 Applicant's Response to SCC's DL4 Submission on Alternate Access to Saxmundham Converter Station.	SCC	DL6
10.	Respond to Mr Stevens concerns regarding numbers of HGVs which would have to access Minster Marshes during the construction phase.	Applicant	DL6
11.	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	Applicant SCC Kent County Council (KCC)	DL6
12.	Respond on the 10 HGV cap proposed by the applicant for the signalised junction in Saxmundham.	SCC	DL6
13.	The Construction Traffic Management Plan says the applicant has a preference for Option 1 (repairing or strengthening the existing bridge). Is this a strong enough form of wording? Should it be that if Option 1 is fully available then the applicant commits to taking this option ahead of the other options?	SCC, East Suffolk Council (ESC), Applicant	DL6
14.	Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.	SCC Applicant	DL6

Action	Description	Action by	When
15.	Does KCC have any remaining concerns that need to be addressed during this examination in relation to Abnormal Indivisible Loads (AIL) access and the routes proposed? If so, explain how these issues could be resolved and how this should be secured.	KCC	DL6
16.	Applicant to respond to Aldeburgh Town Council concerns about health care access impacts through the period of construction and suggest possible mitigation if needed.	Applicant	DL6
17.	Explain the time distribution of HGVs throughout a typical working day. Would there be peak times of the day for HGVs?	Applicant	DL6
18.	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	Applicant All Councils	DL6
19.	If there is anything else the Council's consider is necessary to include within the DCO with regards to traffic and transport matters, include this in your DL6 submission.	SCC KCC	DL6
20.	Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation.	Applicant and SCC	DL6
21.	The ExA requires that the applicant and the highway authorities at SCC and KCC meet to discuss remaining matters of disagreement and try to find a way to progress on these matters as soon as possible. Provide an update at deadline 6.	Applicant and highways authorities	DL6
22.	With the submission of the junction modelling and the other information submitted by the applicant through this examination, do the Councils now consider that there is a sufficiently robust assessment of traffic and highways issues, both for the proposed development alone and also when considered cumulatively? If not, explain why.	SCC KCC	DL6
23.	At this point in the examination, do the Council's consider that there would be any impacts to traffic and transport, particularly driver delay, which would be assessed as significant in your view? If considered that significant adverse impacts would remain after mitigation, is there further mitigation which should be secured? If so, how would this be secured and with what wording?	SCC KCC	DL6

Action	Description	Action by	When
	Would a requirement for the applicant to monitor and if necessary provide adaptive management/remediation mitigation be sufficient to overcome any concerns that the traffic and transport impacts would be significant? If so, please provide wording and explain how this could be secured.		
24.	Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.	Applicant SCC KCC	DL6
Socio-economics and tourism			
25.	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts.	All Councils	DL6
26.	Applicant to respond to comments from SEAS that there has been no attitudinal survey of tourism in the areas of the proposed development.	Applicant	DL6
27.	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	All Councils	DL6
28.	Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?	KCC, Dover District Council, Thanet District Council (TDC)	DL6
29.	Provide plans of the proposed permissive paths and how they would be secured? Furthermore, why have permissive paths been proposed rather than new public rights of way?	Applicant	DL6
30.	Respond to the proposed permissive paths and whether they should be proposed as public rights of way?	ESC SCC	DL7
Health and Wellbeing			
31.	Applicant to reconsider text within the dDCO, requirement 7, regarding the definition of severe weather as an exception to core working hours.	Applicant	DL6

Action	Description	Action by	When
32.	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	All Councils	DL6
33.	Applicant to provide further detailed justifications for all exceptions included in requirement 7, relating to core hours.	Applicant	DL6
34.	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	All Councils	DL6
35.	It is understood that SCC and the applicant are to meet on 7 April regarding access to healthcare and the implementation, monitoring and coordination of mitigation measures to minimise disruption to healthcare access. Provide an update following this meeting.	Applicant, SCC	DL6
Cultural Heritage			
36.	Applicant to respond in writing to Mr Nicholas Bridges oral submission, where new points have been made.	Applicant	DL6
37.	Considering the latest information submitted by the applicant in relation to listed buildings, conservation areas and scheduled ancient monuments, is Historic England content with the level of detail and assessment submitted for this examination?	Historic England	DL6
38.	There are several examples where the applicant's assessment conclusions for listed building impacts is that there was an initial assessment as part of the consented EA1N/2 project with no impact predicted, with then no additional impact predicted in relation to the Suffolk Onshore Scheme (such as with Knodishall Place). For clarity, does this mean that for the Sea Link proposed development alone the applicant considers that there would be no impact to the setting or significance of these listed buildings?	Applicant	DL6
39.	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	All Councils, Historic England	DL6
40.	Is Historic England satisfied with the current level of information and the approach the applicant has set out in regards to the D-shaped enclosure in Suffolk?	Historic England	DL6
41.	With regards to Richborough Saxon Shore Fort, Roman Port, and Associated Remains in Kent, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of these heritage assets?	Historic England	DL6

Action	Description	Action by	When
42.	With regards to the Ebbsfleet Peninsula Multi-Period Complex, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of this heritage asset?	Historic England	DL6
43.	Other than the Ebbsfleet Peninsula Multi-Period Complex, does Historic England disagree with the applicant's assessment of impacts to any of the other non-designated heritage assets?	Historic England	DL6
Cumulative Effects			
44.	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	Applicant and councils	DL6
45.	Comment on whether you believe that the Secretary of State can consider that all stages of the mitigation hierarchy have been fully met based upon the mitigation offered by the applicant at DL5.	SCC, KCC	DL6
46.	The Environmental Statement shows residual significant effects (both moderate and major) at year 15 for landscape and visual receptors in both Kent and Suffolk for which no additional mitigation is proposed. Why is it not possible to offset or compensate for this residual effect? Explain how this accords with the mitigation hierarchy.	Applicant	DL6
47.	Potentially significant cumulative landscape and visual effects are identified in the onshore inter-project effects chapter for Suffolk with LionLink, South Saxmundham Garden Neighbourhood and the Scottish Power Renewables (SPR) schemes with the conclusion that no further cumulative mitigation is available. Why is it not possible to offset or compensate in some way? Explain how this accords with the mitigation hierarchy.	Applicant	DL6
48.	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	Applicant, ESC, SCC, TDC, KCC	DL6
49.	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them	Applicant, ESC, SCC, TDC, KCC	DL6

Action	Description	Action by	When
	necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.		
Marine Physical Environment			
50.	Update dDCO requirement 16 to reflect the commitment to the trenchless crossing exiting 45m east of the continuous Coralline Crag outcrop in Suffolk.	Applicant	DL6
51.	Refine the minimum depth commitment in the Suffolk near-shore/fore-shore area to ensure no exposure of cable in a worst case erosion scenario.	Applicant	DL6
52.	Provide draft requirement wording that commits to no excavation within designated sites in the Suffolk and Kent landfall areas during operation (including emergency repair), or only if subject to a separate approval process.	Applicant	DL6
53.	Confirm that there would be no use of pneumatic casings or provide an assessment of the use of temporary casings, either in terms of significant noise effects at either landfall or any impact on the integrity of the Coralline Crag.	Applicant	DL6
54.	Update Pegwell Bay construction method technical note to confirm use of bentonite in the foreshore area and ensure that the technical note and relevant technical chapters provide a clear and consistent definition of the near shore, foreshore and offshore.	Applicant	DL6
Noise and Vibration			
55.	Meet with the ESC and TDC (and if relevant KCC and SCC) for a tripartite noise meeting. The aim of the meeting: <ul style="list-style-type: none"> • draft a dDCO requirement relating to the s61 process and confirm whether s61 commitments should be on the face of the DCO or within the outline construction noise and vibration management plan (oCNVMP). • agree wording of Article 49 as it relates to both construction and operation. • draft a dDCO requirement for operational converter and substation noise limits and confirm whether noise thresholds should be on the face of the DCO or part of the REAC. 	Applicant	DL6
56.	Provide a technical note, outlining the effect of 24-hour construction vehicle noise from the hoverport area for residential receptors and any necessary mitigation. The technical note should include noise contour mapping based on the marine ornithology maps [REP5-032]. The modelling should apply a hard ground assumption to the hoverport.	Applicant	DL6
57.	Comment on the need for an R-wave study at the hoverport and the potential impact on invertebrates from any nighttime lighting.	Applicant	DL6

Action	Description	Action by	When
58.	Respond to the applicant's points relating to noise during start up and close down periods.	ESC	DL6
59.	Respond to the applicant's comments on noise thresholds for the shoulder hours.	SCC	DL6
60.	Comment on the use of white noise alarms (or equivalent quiet systems) and what level of commitment the applicant could make to secure their use.	Applicant	DL6
61.	Check and confirm in writing whether discharge of backup generators within the SPR consents relates to the National Grid substation or the SPR substations. If the latter, provide an assessment of the implications for cumulative noise and air quality from generators.	Applicant	DL6
Air Quality			
62.	Confirm how Annual Average Daily Traffic Data (AADT) presented in the cumulative vehicle emissions assessment relates to the peak traffic data presented in the transport assessment.	Applicant	DL6
63.	SCC [REP5-178] noted that the oCTMP [REP4-061] allows for diversion of light construction traffic through Saxmundham. Provide evidence to demonstrate that vehicle movements on the Saxmundham road links would be below the threshold for air quality assessment.	Applicant	DL6
64.	Confirm whether diversion of construction traffic through Saxmundham would have any implications for the impact assessment.	ESC	DL6
65.	Provide evidence that traffic levels are below the threshold whereby construction vehicle air quality assessment should have taken into account movements from Ramsgate Port and the A299 Royal Harbour Approach Tunnel.	Applicant	DL6
66.	Explain the likely effect of oxides of nitrogen (NO _x) emissions on ditches adjacent to the Kent converter and substation site and explain whether additional mitigation is required for nutrient loading or acidification effects on the local ditch network.	Applicant	DL6
67.	Subject to confirmation of whether additional generators are present on the SPR sites, update the air quality technical note [REP5-136] with a cumulative assessment of operational generator emissions with the SPR proposals on Grove Wood.	Applicant	DL6
68.	Provide further detail regarding the supply of water for dust suppression (likely source and timing availability, notwithstanding SPR supply position). Address ESC concerns in response.	Applicant	DL6
69.	Confirm whether proposed monitoring in the outline Air Quality Management Plans (oAQMP) includes Whitearch residential park.	Applicant	DL6
Ornithology			
70.	Update marine ornithology chapter and habitats regulations assessment (HRA) with Red-Throated Diver (RTD) displacement assessment based on Reach et al (2013) method.	Applicant	DL6

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71.	Confirm with Natural England whether effects identified as likely to give rise to Adverse Effects on Integrity (AEoI) can be ruled out before close of examination, or provide relevant information to inform a derogation case (for example, in respect of impacts on RTD due to emergency cable breaks/repairs) as required by NPS EN-1.	Applicant	DL6
Ecology and Biodiversity			
72.	Update terrestrial elements of the ecology and biodiversity chapters and HRA to reference potential effects from unexploded ordnance (UXO) at trenchless crossing entry pits in Suffolk and Kent.	Applicant	DL6
73.	Explain your response to 2LVIA5 [REP5-135], which states that the restoration of the acid grassland to a higher quality than its current quality would be a requirement of the golf club with the restored cable corridor to be managed for a five year duration. Also explain how the requirement would be secured.	Applicant	DL6
74.	Confirm that an appropriate offset (for example 30m) has been applied to the proposed site access road over the River Fromus to avoid disturbance for barn owls.	Applicant	DL6
75.	Update the REAC to fully reflect the measures outlined in EA0001 [REP5-192], such as a minimum 10m offset to avoid impacts on nocturnal protected species, or provide justification as to why this is not appropriate.	Applicant	DL6
76.	Provide an explanation as to why the proposed Minster converter station and sub-station site layout cannot retain the double hedge and ditch that connects the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest to the wider ditch network.	Applicant	DL6
77.	Provide any evidence of beaver activity in the Minster stream area.	Save Minster Marshes	DL6
78.	Provide a list of hedgerows of particular concern for bats, where the council considers that use of horizontal directional drilling (HDD) might be justified.	ESC	DL6
79.	Comment on ESC's concerns [REP5-172] relating to article 27 and hedgerow gaps.	Applicant	DL6
80.	Update the REAC [REP5-115] and outline Landscape and Ecological Management Plans (oLEMP) [REP4-065] [REP4-067] to address the mechanism for mitigation of hedgerow gaps post-construction. This should cover the period until mitigation becomes sufficiently established.	Applicant	DL6
81.	Respond to the applicant's comments regarding hedgerow gaps.	ESC, SCC	DL6
82.	Provide an update on any agreements with National Trust regarding works in Pegwell Bay.	Applicant	DL6

Action	Description	Action by	When
83.	Explain whether there can be any greater separation between the proposed works and the saltmarsh. Include consideration as to whether more disturbing works activities could be restricted in areas close to the saltmarsh.	Applicant	DL6
84.	Comment on the applicant's proposed approach to accessing the hoverport and intertidal area, including use of wheel washing as set out in its response to 2ECOL24 [REP5-135].	TDC	DL6
85.	Confirm any lighting requirements at the hoverport, for example for wheel washing.	Applicant	DL6
86.	Draft DCO Requirement 5(3) [REP5-005] secures mitigation in respect of pre-commencement operations. The primary control is the REAC [REP5-115], however triggers in the REAC such as GG02 relate to construction rather than pre-commencement activities and the REAC does not appear to be separately inclusive of all of the ecological survey requirements in the oLEMPs [REP4-065] [REP4-067]. Explain how requirement 5 secures that relevant ecological surveys for species such as bats, dormice and reptiles would be carried out in advance of construction activities like vegetation clearance or update the REAC with a specific pre-commencement provision that secures ecological surveys.	Applicant	DL6
87.	Provide additional detail on the scope and methodology of proposed pre-commencement surveys in the oLEMP [REP4-065] [REP4-067] or make provision for agreement of scope and methodology with the relevant planning authorities (for example for bats, reptiles and dormice).	Applicant	DL6
88.	ESC [REP5-172] reference A1.21 suggests that operation of the authorised development does not fall under the definition of all works forming part of the authorised development in requirements 5 and 6, this is because the definition of authorised development relates to works rather than operation. Suggest alternative wording to ensure that control plans apply to operational activities.	Applicant	DL6
89.	Provide further detail about the procurement procedure relating to biodiversity net gain (BNG) and how it would secure local net gain commitments. Also provide information on any local net gain proposals, where possible.	Applicant	DL6
Any other business			
90.	Provide any further evidence on the need for the project that you consider is not already before the ExA.	Marianne Fellowes	D6