



**SEAS COUNTER-RESPONSE TO THE
APPLICANT'S D5 COVER LETTER- [REP5-001]**

RE: CROWN ESTATES [RR-5378]

PINS Ref: EN020026

SEAS IP: [REDACTED]

DEADLINE 6: APRIL 13, 2026

Date: 13 April 2026

APPLICANTS STATEMENT FROM DEADLINE 5 COVER LETTER- [REP5-001](#) :-

“SEAS REP4-202: In response to the above submission from SEAS, the Applicant regrets to say that the wrong version of Appendix B to the Statement of Reasons was displayed during the Compulsory Acquisition Hearing 1. In the version displayed, the Relevant Representation was attributed to the incorrect Affected Party. The correct position in respect of the Crown Estates is as set out in the Relevant Representation [RR-5378], which states: “The Crown Estate requests to be registered as an Interested Party in the examination of Sea Link. Our interest in the project relates to the proposed cable route and the agreement of land and seabed rights required to deliver the project.”

Procedural Note on the Reliability of the Applicant’s Evidence

1. SEAS has considered the Applicant’s statement in its Deadline 5 Cover Letter (REP5-001), in which it claims that “*the wrong version of Appendix B*” was displayed at CAH1 and that the paraphrased summary of Relevant Representation AP458 “*was attributed to the incorrect Affected Party.*”
2. The Applicant now asserts that the Crown Estate’s position is limited to the short registration RR-5378.
3. This explanation does not resolve the issue. It exposes a deeper and more troubling problem: the Applicant has allowed inaccurate, unattributed, and potentially fabricated material to enter the Examination record and remain there for months without correction.
4. For many months, the Applicant’s own Schedule of Negotiations (REP3-016) has contained a detailed paraphrase attributed to the Crown Estate, including statements of “*deep unease about the environmental consequences... cumulative impact... long-term disruption... financial loss.*”
5. These are not incidental remarks. They go to the heart of the Examination.

6. Yet the Applicant now says these concerns were attached to the wrong party, cannot explain how this occurred, and offers no clarity on who actually raised them, or whether they were raised at all. This is not just a clerical oversight. It is a failure of evidential governance.

7. When an Applicant places information before the Examining Authority, it carries a duty to ensure that information is accurate, traceable, and properly attributed. That duty has not been met.

8. The Crown Estate is the King's land. Its position carries constitutional weight and directly affects compulsory acquisition, deliverability, environmental assessment and Section 135 consent.

9. When the Applicant misrepresents the Crown Estate's views, publishes them, leaves them in the Examination Library, presents them at a public hearing and then retreats to a one-line RR-5378 without explaining the discrepancy, it raises a simple but unavoidable question: if the Applicant cannot accurately represent the position of the King's land, how can any part of its evidence be trusted?

10. The Applicant's documentation underpins every major component of this Examination: environmental assessment, cumulative impacts, alternatives, consultation, land rights, compensation, and the project's basic credibility.

11. If the Applicant can misattribute a representation of this importance, then the reliability of its wider evidence base is in doubt.

12. If the paraphrased concerns were not the Crown Estate's, the Applicant must identify whose they were.

13. If they were the Crown Estate's, the Applicant must disclose the full representation.

14. If they were neither, the Applicant must explain how such detailed objections came to be created, published, and presented as fact.

15. SEAS therefore respectfully asks the Examining Authority to direct the Applicant to:

1. Disclose the source of the paraphrased concerns, including any correspondence or negotiation records.
2. Confirm whether these concerns were raised by the Crown Estate.
3. Identify the Affected Party to whom the paraphrased concerns actually relate.
4. Explain how incorrect information came to be included in REP3-016 and presented at CAH1.

16. Until these matters are clarified, SEAS submits that the Examination cannot safely rely on the Applicant's submissions in their current form.

end.