

Our Ref: XA/2025/100350/08

Your Ref:

Date: 04/05/26

To whom it may concern.

**SEA LINK, EAST ANGLIA AND KENT
ENVIRONMENT AGENCY RESPONSE FOR DEADLINE 7**

National Grid has asked us to review certain documents within their most recent submission to the Planning Inspectorate which occurred on the 29/04/25.

This response constitutes the Environment Agency's response to this submission (the references of the documents reviewed can be found on annex C). Please note these documents have come directly from the applicant and are not yet present on the Planning Inspectorates website.


If these documents are accepted, then most of our issues have now been resolved subject to the comments in annex A. Where we have issues remaining, we have recommended updates to the Register of Environmental Actions or Commitments (REAC) or the Development Consent Order itself.

For completeness the full Environment Agency's position on the Sea Link DCO is contained in this document (Based on the assumption the documents submitted in annex C are accepted by the Planning Inspectorate).

This letter is therefore comprised of the following:

- Appendix A: Comments and recommendations on information received
- Appendix B: Summary of our position of the Sea Link Planning Application
- Appendix C: References to documents reviewed

Yours sincerely


Planning Account Manager,
Environment Agency

Appendix A: Comments and recommendations on information received.

Flood Risk:

EA068 Issue resolved if the following occurs:

REAC document: The Flood Emergency Plan (FEP) should remove all materials from the 1% AEP flood extent in response to a predicted flood (e.g., Flood Warning). The Flood Emergency Plan should be informed by modelling the construction phase to determine stockpile locations in addition to other contingencies.

DCO/REAC The Environment Agency should be consulted on the FEP.

Note: Stockpiles in a high flood risk area are seen as a significant issue when determining Flood Risk Activity Permits. We recommend early engagement with the permitting service on this issue. Please note the permitting process is a separate process and determination is independent of the planning process.

REAC commitment: Remediation of cables to occur if there is a risk of exposure/they become exposed inclusive of the foreshore

EA070 Issue resolved if the following occurs:

We note the Requirement 6 on providing the flood drainage details based on the overarching flood strategy to be provided by the applicant. For the majority of the site we are content with the strategy apart from one area where the drainage option has yet to be established.

We have concerns that this is a strategy level discussion, In addition this requirement does not cover pre commencement activities. As such the preference is that a separate requirement is added to the DCO to ensure clarity on this issue.

Temporary drainage – Suffolk

(1) No temporary works which form part of the authorised project as shown on Sheet 1 of the Works Plans (Rep4 006 sheet 1)

(2) No part of Work No.3A (Access Road to the Suffolk Converter Station)

may commence until a temporary drainage solution has been agreed with the lead local flood authority and the Environment Agency and details of that solution have been submitted to and approved by the lead local flood authority following consultation with the Environment Agency.

(3) The works referred to in sub-paragraphs (1) and (2) include pre-commencement operations.

(4) In this requirement, “temporary drainage solution” means a drainage solution to replace reference TC-45-ATPN in the Outline Drainage Strategy – Suffolk.

EA075

Issue Resolved.

EA079

REAC commitment: Remediation of cables to occur if there is a risk of exposure/they become exposed

EA081

Issue Resolved.

Water Quality

EA045

Issue resolved

EA041

Issue resolved.

Comments on the Development Consent Order:

Our request remains to that of previous responses:

Part 2 Principal powers: Limits of deviation

We have concerns over “Limits of deviation – which would the development to occur –
“downwards to such an extent the undertaker considers necessary or convenient”.

We request that this is updated to include no lower than levels stipulated in Flood Risk Assessment.

Schedule 16 Procedure for Discharge of Requirements

As a named consultee on the discharge of several Requirements, we require the provision of at least 21 calendar / 15 business days in which to respond to the discharge authority. This should be reflected in the Development Consent Order.

Appendix B: Position of the EA (subject too documents listed in appendix C being accepted by the Examining Authority).

Key:

	Recommendations to provide resolution have been provided
	Issue resolved

Subject	Relevant Rep Reference	Area	Notes	Documents submitted under deadline 6 for response on deadline 7	Documents submitted by NG for deadline 7 (documents received separately not on pins website)
Biodiversity	EA001	Both	Construction activities near watercourse		
Biodiversity	EA002	Suffolk	Surveys prior to operation		
Biodiversity	EA003	Suffolk	Culverting		
		Suffolk	Culverting		
Biodiversity	EA004	Suffolk	Riparian buffer from watercourse		
Biodiversity	EA005	Suffolk	Halt construction when protected species discovered		
Biodiversity	EA006	Kent	Intertidal habitat be included in Kent parameters		
		Kent	Intertidal habitat be included in Kent parameters		
Biodiversity	EA007	Kent	European Mink Confirmation		
Biodiversity	EA008	Kent	Include Beavers and mitigation		
Fisheries	EA009	Suffolk	Include Brook Lamprey		
Fisheries	EA010	Suffolk	Include lamprey and Eel		
		Suffolk	Include lamprey and Eel		
Fisheries	EA011	Suffolk	Include Smelt		

		Suffolk	Include Smelt		
Fisheries	EA012	Suffolk	update Eel and lamprey habitat		
		Suffolk	update Eel and lamprey habitat		
Fisheries	EA013	Suffolk	4M Fromus Soffit Height		
		Suffolk	4M Fromus Soffit Height		
		Suffolk	4M Fromus Soffit Height		
Fisheries	EA014	Suffolk	Include Smelt		
Fisheries	EA015	Suffolk	Include and asses impacts to Eel at Suffolk landfall site, Ore/Alde and Minsmere Old River, and along the Suffolk coast.		
Fisheries	EA016	Suffolk	cabling heat and Thermal Plumes impacts on Smelt		
Fisheries	EA017	Suffolk	update brown trout data		
Fisheries	EA018	Suffolk	Salmon and Eels legislation		
Fisheries	EA019	Suffolk	noise impacts on fish from construction		
Fisheries	EA020	Suffolk	Culverts		
Fisheries	EA021	Suffolk	control and management of eels		
Fisheries	EA022	Suffolk	Vibro pilling near salmon		
		Suffolk	percussive pilling in the fromus near salmon		
Fisheries	EA023	Suffolk	Risk to fish entrapment at outfalls		
Fisheries	EA024	Kent	include sea trout for impacts in River Stour		
Geomorphology	EA025	Both	culverts		
		Both			
		Both			

Geomorphology	EA026	Both	Quantitative shear strength modelling/scour assessment		
Geomorphology	EA027	Both	Expand analysis including landfalls locations		
Geomorphology	EA028	Suffolk	Specify the se of attenuation/settling ponds, clarify whetehr culverts will be permanent or temporary		
Geomorphology	EA029	Suffolk	Micro-sitting the route to avoid coraline crag outcrop		
Geomorphology	EA030	Suffolk	site breakout plan that avoids coraline outcrop		
Geomorphology	EA031	Kent	timescales of recovery and udnerstanding on going issues of soft sediment		
Geomorphology	EA032	Kent	at least 3m burial under thelow flow channel of the stour		
Water Resources	EA033	Both	Water Supply strategy and options appraisal		
		Both	Water Supply strategy and options appraisal		
Water Resources	EA034	Both	Impoundments and non-consumptive and consumptive, dewatering and other activities		
		Both			
Water Resources	EA035	Suffolk	dewatering receptors should be included		

Marine	EA036	Both	Re-assess the dispersive stages of INNS may travel in relation to the project.		
		Both			
Marine	EA037	Both	Incorporate watersipora subatra within the biosecurity plan		
Marine	EA038	Kent	complete the sentences		
Marine	EA039	Kent	Specify the equipment transported to the HDD entry pits, not across saltmarsh. Update the offshore CEMP		
		Kent			
Water Quality	EA040	Both	Fire supression system and should be added as control management issues in OEMP		

Water Quality	EA041	Both	Contaminated water must be disposed off site or treated. run off from batching plant must be separated from the site drainage.		
Water Quality	EA042	Both	herbicide use near WC and measure included in CEMP		
Water Quality	EA043	Both	Discharge of construction dewatering or GW dewatering requires a permit.		
Water Quality	EA044	Both	storage distances should be atleast 10m from WC		
Water Quality	EA045	Both	over pumping plan in for silt management		
Water Quality	EA046	Suffolk	Water quality monitoring during and after construction		

Water Quality	EA047	Kent	HDD breakout and management in pegwell bay must be included in the CEMP		
Waste	EA048	Both	Identify all materials and waste in the management plan listed in issue EA048		
Waste	EA049	Both	More detail required for relevant waste legislation and its duty of care		
GWCL	EA050	Both	GW bodies are scoped out of the zone of interest, the EA have not agreed this. And HRA requires: assessment of drilling muds, HDD brekoutplan and Receptors identified.		

GWCL	EA051	Both	FRAC out MP should include the muds and referenced in the CEMP		
GWCL	EA052	Both	Update all documents to avoid and mitigate GW bodies with updated guidance		
GWCL	EA053	Both	Desk based assessment of thermal impacts to GW bodies form cabling		
GWCL	EA054	Both	Include unexpected contamination requirement		
GWCL	EA055	Both	GG17 Wash water will be prevented from passing into watercourse untreated.		
GWCL	EA056	Both	include notification of EA of any incident impacting the environment		

GWCL	EA057	Both	Include within W09 to notify the EA of significant spills		
GWCL	EA058	Both	Include the requirements for permits or exemptions within GH10		
GWCL	EA059	Both	Update W08 and W09 to include reference to mitigation of GW contamination that impacts private WS		
GWCL	EA060	Both	Update GH12 to make a commitment to assessing the risks of most vulnerable areas		
GWCL	EA061	Both	EA to be consulted on the FWRA prior to commencement		
GWCL	EA062	Both	make reference to EPS requirements for GH05 and GH10		
GWCL	EA063	Suffolk	Unexpected GW will need to be managed and contingency plan during excavations		
Flood Risk	EA064	Both	Fromus bridge design, sofit height mAOD to be reviewed by EA		

Flood Risk	EA065	Both	Apply sequential approach to avoid flood zone 3b where possible, justify when within		
Flood Risk	EA066	Both	Provide identification of medium risk areas and mitigation plans		
Flood Risk	EA067	Both	Expand plan to include temporary/permanent flood defence repair procedures linked to settlement monitoring		
Flood Risk	EA068	Both	Clarify no open cut crossings of main rivers and ensure stock piles outside flood zone 3b and 1% AEP		
Flood Risk	EA069	Both	Flood compensatory storage for any ground raising materials stored outside of Floodzone 3b		
Flood Risk	EA070	Both	Details of attenuation ponds and construction methods, ground levels changes and reviewed. Include in CEMP		
Flood Risk	EA071	Both	Clarify fence locations and ensure they do not impede access to river and flood defences		

Flood Risk	EA072	Both	Confirm techniques that will monitor existing flood defences and which ones		
Flood Risk	EA073	Both	Blockage assessments and sensitive receptors at risk, confirm suitability under flood conditions and for retained culverts. Assessment of flood risk should be provided		
Flood Risk	EA074	Both	Clarify sensitivity rating for receptors as people, property and infrastructure		

Flood Risk	EA075	Both	No loss of flood plain or impedance of flood flow. Confirm where land raising is proposed and measurements in mAOD.		
Flood Risk	EA076	Both	Update wording to reflect 16m from WC from tidal main rivers, updated in the CEMP		
Flood Risk	EA077	Suffolk	confirm number of locations of retained culverts and ensures FRA covers all crossings		
Flood Risk	EA078	Suffolk	Confirm Confidence level of HDD feasibility		
Flood Risk	EA079	Suffolk	Coastal erosion assessment should be provided. Commitment to remove cabling and ducts at decommissioning, include in FRA		

Flood Risk	EA080	Suffolk	Monitoring of settlement and flood defences, with emergency triggers and actions. EA notification and details included in CEMP		
Flood Risk	EA081	Suffolk	Confirm if bridge will be decommissioned or provide adaptation for flood risk		
Flood Risk	EA082	Suffolk	Conduct assessments of less than 3 km ² catchments and incorporate into the Flood Risk Assessment.		
Flood Risk	EA083	Kent	River Stour mitigations in the CEMP		
Flood Risk	EA084	Kent	Clarification is needed as to the location of earth bunds and significant ground level raising.		
Flood Risk	EA085	Kent	temporary scaffolding over river stour,we require details of methods statement, installation and removal in and		

			emergency included in the CEMP		
Flood Risk	EA086	Kent	Confirmation or details of coffer dam locations to be submitted to ascertain exact location.		
Flood Risk	EA087	Kent	Kent Landfall cofferdam unclear. Design details location and methodology required in CEMP. Confirm distance from defence line/main river		
Flood Risk	EA088	Kent	HDD exit pits require details of methodology and construction method included in CEMP. And distances to main river		
Flood Risk	EA089	Kent	Storage of materials within river stour, mitigations and locations in the CEMP and FRAP if not plausible.		
Flood Modelling	EA090	Suffolk	Ensure crossings are sized appropriately and do not increase flood risk S/WA/0064 and S/WA/0057.		

Flood Modelling	EA091	Suffolk	Review the positioning of the two temporary attenuation ponds and jointbays at grid reference 640435, 262050 considering the updated Flood Map for Planning published in March 2025.		
Flood Modelling	EA092	Suffolk	review latest surface water flooding data 2025, ensure no noticeable changes		
Flood Modelling	EA093	Suffolk	Please review the updated Risk of Flooding from Surface Water mapping in the context of the temporary attenuation basin located just to the northeast of construction compound S03.		

Flood Modelling	EA094	Suffolk	Review the flood risk from ordinary watercourses to ensure infrastructure is appropriately located. Attenuation pond and construction compound S02 and crossing S/WA/0057.		
Flood Modelling	EA095	Kent	Ensure culverts are designed such that they can easily convey the design flood flow for these watercourses		
Flood Modelling	EA096	Kent	check New NaFRA2 data is included		

Appendix C: Document references:

- *Document 9.84 Register of environmental actions and commitments version E April 2026.*
- *Document 7.5.3: Outline Onshore Construction Environment Management Plan Version: E April 2026*
- *Document 9.17.1: Suffolk Drainage Strategy Version: C April 2026*
- *Document: 3.1 Draft Development Consent Order Version: J April 2026*