

Planning Inspectorate
BUCKINGHAM AVENUE, SLOUGH, SL1
4PN

Reference: OR-0012808/01
Customer reference: EN020026

19 October 2026

All-interested parties consultation following the 28 August 2026 request for information.

Sea Link

Dear sir/madam

Thank you for your consultation which we received on 22 September 2026. We have reviewed the documents submitted relevant to our remit and have the following comments for your consideration.

1. C1-169 Suffolk County Council Response to Request for Information - Question 38

We note Suffolk County Council's response in support of the revised construction-phase drainage design.

From a fluvial flood risk perspective, we consider that the revised drainage design addresses our previous concerns. The temporary attenuation basin previously proposed within Flood Zone 3 has been replaced by a linear drainage feature located in Flood Zone 1. Works within Flood Zone 3 are now limited to the outfall connection with the receiving watercourse, which is considered necessary.

Given the temporary nature of the construction phase drainage, the relocation of the drainage to Flood Zone 1 and the limited extent of works within Flood Zone 3, we consider that the flood risk matters relevant to part b of the Exception Test can be appropriately addressed through detailed design, secured by the relevant DCO Requirement.

On this basis, we have no outstanding objection to the revised construction phase drainage design on fluvial flood risk grounds.

2. C1-216 Document 9.84 - Register of Environmental Actions and Commitments (REAC) REAC ID

Saltmarsh

We have reviewed the commitments associated with the works and associated trenchless construction methods. Subject to no access being taken across saltmarsh habitat to reach mudflat areas, we have no concerns regarding the proposed measures. However, for surety, we request to be listed as a named consultee on commitment B67 in the REAC.

Fisheries

With regards to aquatic ecology, whilst we understand the need to avoid drilling during the peak overwintering bird period, consideration should also be given to potentially sensitive fish species. European eel, including glass eel and elvers may migrate from marine to freshwater environments between March and August, with peak migration generally occurring between April and July. Activities such as drilling or sediment disturbance within estuarine and transitional waters during this period may affect migration success. Where sediment removal techniques such as suction dredging or water injection dredging are used, the Applicant should also consider compliance requirements under the Eels (England and Wales) Regulations 2009.

Sea trout and Atlantic salmon may also be present within transitional waters throughout the year, with occupancy often increasing during summer months while fish await suitable freshwater flows to enter spawning rivers. Construction activities in or near these environments therefore have the potential to cause disturbance impacts.

Given that the proposed works will use trenchless methods, the risk to the species identified above is likely to be minor or negligible. However, the Secretary of State may wish the Applicant to consider the points raised above in order to provide additional reassurance.

Groundwater Protection

We welcome the inclusion of commitment GH15 within the updated REAC. We note that the wording of commitment GH15 could be strengthened by using definitive language such as "must not" or "will not" to avoid ambiguity. Based on available geological information, the proposed directional drilling is expected to pass through the Coralline Crag formation, which is understood to be of sufficient thickness (approximately 25 metres) to avoid unintended penetration into the Chalk aquifer, even allowing for reasonable drill deviation. Geological mapping also suggests that, at the landfall location, the Coralline Crag overlies the London Clay/Thames Group rather than the Chalk aquifer. The Applicant should continue to utilise available borehole and geophysical data to confirm subsurface conditions and inform final design.

3. C1-178 - Responses to Secretary of State's consultation 1 - 9.158 Applicant's Response to SoS Request for Further Information Letter – question 37

We confirm that issue EA079 was resolved following the Applicant's update on remaining issues submitted by AECOM on 17 June 2026. In a letter sent to the Applicant (dated 24 July 2026, reference OR-006679/01), we stated the following regarding EA079:

We acknowledge the amendments made to commitment MPE06 in the Register of Environmental Actions and Commitments [[REP7-360](#)], and the additional information provided by the Applicant, regarding the monitoring of coastal processes and the potential for cable exposure. We also note the Applicant's explanation that cable exposure is considered highly unlikely due to the depth of the cable beneath the intertidal area.

Having reviewed the proposed amendments, we are satisfied that the commitment now provides an appropriate framework for monitoring and managing this matter. We therefore agree with the Applicant's proposed approach and are content for this issue to be resolved.

We therefore consider the issue resolved, and have no further comments.

4. C1-208 - Responses to Secretary of State's consultation 1 - 9.157 Suffolk Landfall Trenchless Installation Depth Assessment Technical Note

We reviewed this document, and provided a response in C1-105 – Responses to Secretary of State's consultation 1 (see [here](#)) in which we resolved our concerns in regards to vertical limits of deviation. Therefore, we have no further comments to make on this matter.

5. C1-195 - Responses to Secretary of State's consultation 1 - 7.5.2 (F) Outline Offshore Construction Environmental Management Plan (Tracked Changes) (PDF, 7MB) Document 7.5.2 - Outline Offshore Construction Environmental Management Plan

Geomorphology

We are satisfied that the two proposed HDD exit points within Pegwell Bay would result only in localised and minor impacts on the geomorphology and conservation interests of the sandflat and mudflat habitats, under normal operating conditions. From a Water Framework Directive perspective, these impacts are not considered significant. We note, however, that Natural England may wish to provide separate comments regarding ecological impacts.

We offer the following advice for to inform the detailed design in due course:

For the avoidance of doubt, we would not approve of mitigation involving training walls, lateral erosion protection works, or any proposals intended to constrain the natural migration of the estuary channel. This position would include any proposals to protect HDD exit points from lateral erosion. The continued operation of natural estuarine processes is considered important and should not be compromised.

Water quality and drilling fluid management

We are not currently listed to be consulted on commitment B59 in regard to the Landfall Method Statement (Trenchless Techniques and Drilling Fluid Management Plan) for both the Kent and Suffolk Landfall works. We request to be listed for consultation on this commitment.

We offer the following advice for to inform the detailed design in due course:

While we consider the HDD exit points would result only in localised and minor impacts under normal operating conditions, the Applicant should demonstrate that robust measures are in place to prevent and manage any drilling fluid breakout events.

We note that drilling fluids are unlikely to constitute regulated substances under Water Framework Directive or Environmental Quality Standards Designation (EQSD) and therefore are not generally managed through waterbody-scale environmental quality limits. Nevertheless, uncontrolled releases could become a pollution issue if sufficient quantities are released and environmental harm results. Any such assessment would primarily relate to ecological impacts, including potential smothering effects on habitats and species. Accordingly, the Applicant should clearly demonstrate how potential breakout incidents will be prevented, monitored and mitigated.

6. C1-180 - Responses to Secretary of State's consultation 1 - 3.1(K) (Post-Examination) draft Development Consent Order (Clean)

In our response letter OR-0010868/01 (dated 18 September 2026), we stated that we'd resolve our outstanding issue from examination - EA070, subject to the inclusion of a requirement. After reviewing the C1-180 - Responses to Secretary of State's consultation 1 - 3.1(K) (Post-Examination) draft Development Consent Order (Clean), we note that this requirement is now included in the DCO, albeit with slightly altered wording as follows:

24.—(1) No works forming part of the authorised development relating to Work No. 2 and Work No.5 as shown on Sheet 1 of the Works Plans – Suffolk only may commence until details of the temporary drainage solution which is referenced in Appendix A of Document 9.17.1 Suffolk Drainage Strategy as the 'temporary construction linear attenuation along haul road' have been submitted to and approved by Suffolk County Council in consultation with the Environment Agency.

(2) The works referred to in sub-paragraph (1) also include pre-commencement operations which are related to the relevant works and could increase surface water run-off.

We approve of the inclusion of this wording, and are content to resolve the outstanding issue EA070.

If you have any questions regarding our response, please contact
Nlteam@environment-agency.gov.uk.

Yours sincerely,

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2 Marsham Street, London, SW1P 4DF