



Meeting note

Project name	Sea Link
File reference	EN020026
Status	Final
Author	The Planning Inspectorate
Date	27 February 2023
Meeting with	National Grid Electricity Transmission (NGET)
Venue	MS Teams
Meeting objectives	Project update meeting
Circulation	All attendees

Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which Applicant (or others) could rely.

Project Update

The Applicant informed the Inspectorate that non-statutory consultation took place over a period of 8 weeks from 24 October 2022 to 18 December 2022. The Applicant confirmed that they had identified some additional consultees as listed on Schedule 1 (The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009) and it has contacted these organisations and provided them with an opportunity to respond. The applicant has noted that it was already engaging with number of these organisations on the Sea Link Project.

The Applicant's team have been considering all the responses received. The Applicant explained that the main themes arising from the Scoping responses include the following:

- Co-ordination of projects & cumulative effects;
- Friston Substation; and
- Worst case parameters.

The Applicant will arrange specialist themed meetings with relevant stakeholders, as necessary. The Applicant explained that monthly meetings continue to be held with local authorities and statutory and non-statutory bodies, focusing on responses received from the Scoping Opinion. The Applicant informed the Inspectorate that site visits were held with stakeholders in December (in Suffolk) and January (in Kent).

The Applicant confirmed that it is preparing an initial draft Statement of Common Ground (SOGC) with the local authorities for consideration and comment. The Applicant informed the Inspectorate that a limited number of environmental and engineering surveys have taken place to date due to difficulties agreeing voluntary access with the local landowners. Many agreements have now been reached, and further work is continuing with all landowners and representatives to seek access to the land.

The Applicant has made concerted efforts to secure access to land as this is necessary and important for the start of the ecology survey season. There is the option of relying on the provisions within S172 of the Housing and Planning Act, however this is the last resource that National Grid would be looking to use. One S172 authorisation has however been issued in Kent which has allowed access for wintering bird surveys. Urgent survey access in Suffolk have been agreed upon by negotiation, with additional negotiations to agree access for ecology surveys in spring in both regions to begin soon.

Indicative Timeline

The Applicant informed the Inspectorate of their indicative timeline, as follows:

- 2022: Non-statutory consultation;
- 2022: EIA scoping submitted to PINS;
- 2023: Pre-consultation stakeholder briefings;
- 2023: Statutory Consultation;
- 2023: Update stakeholders;
- 2024: Submission of Development Consent Order (DCO) application;
- 2024-25: Pre-Examination, Examination and Reporting;
- 2025: Secretary of State decision; and
- 2026-2030: Planned construction.

Non-Statutory Consultation Overview

The non-statutory consultation lasted a period of 8 weeks. The Applicant confirmed that there were 11,360 website visitors during the non-statutory consultation period. The Applicant explained that the Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) had been identified for the purpose of the non-statutory consultation. It was confirmed that 11,061 addresses were written to in Suffolk, and 6,624 in Kent.

The Applicant informed the Inspectorate that all member briefings were held with Suffolk County Council (SCC) on 19 October 2022 and East Suffolk District Council (ESDC) on 25 October 2022. Additionally, parish and town council briefing webinars were delivered on 31 October and 3 and 8 November 2022. Briefings were also held with community groups; Suffolk Energy Action Solutions (SEAS) on 3 November and Substation Action Save East Suffolk (SASES) on 29 November 2022.

Two drop-in sessions for landowners in Suffolk and Kent were held on 2 November and 16 November 2022. The Applicant also confirmed that public events were held on consecutive weekends in Suffolk (10-12 November 2022) and Kent (17-19 November 2022). There were 750+ visitors in Suffolk and 58 visitors for Kent.

Key Feedback Responses

The Applicant informed the Inspectorate that they received 600+ feedback responses. The Applicant explained that the responses provided centred around the following topics and themes:

- Converter station size;
- Noise;
- Traffic;
- Impact on tourism;
- Duration of construction works;
- Visual impact of works;
- Potential flooding; and
- Impact on golf courses (Kent scheme).

Points were also raised regarding the possibility of utilising Sizewell (Suffolk) and/or brownfield sites as alternative locations for the converter station.

Approach to Co-ordination

The Applicant confirmed to the Inspectorate that it considers it is possible that it could include additional installation ducts within its application in order to facilitate co-ordination with other projects being promoted by National Grid Ventures (NGV) (i.e., Eurolink and Nautilus). As such it noted that (following a team review) the proposed cable corridor could accommodate 10 ducts at the landfall to Transition Joint Bay (TJB), 11 ducts for HVDC cables (TJB to converter) and 16 ducts for HVAC cables (converter to substation). Independently, Sea Link requires 4 ducts at the landfall to TJB, 3 ducts for the terrestrial HVDC cable and 8 ducts for the HVAC cable. The applicant noted that these details are being considered at the moment and can be subject to change as the project progresses.

The Applicant informed the Inspectorate that the draft DCO submission including the Order Limits, the Mitigation strategy and Drainage strategy would include for co-ordination. The Preliminary Environmental Information Report (PEIR)/Environmental Impact Assessment (EIA) would assess the ability for the Sea Link converter station in Suffolk to be in one of three defined positions (referred to as 'parking bays') within the selected site for the converter. The other two 'parking bays' would be assessed as potential locations for the Eurolink and the Nautilus infrastructure at the converter site. Landscape and Visual Impact Assessments (LVIA) visualisations for the converter station scenarios would be undertaken by the Applicant.

Next Steps

The meeting highlighted the complexity in making cases for two approaches (with or without co-ordination) that both stand up to scrutiny without undermining each other. The Inspectorate advised the Applicant to carefully consider the drafting of the DCO to ensure the chosen approach works with the content of the Order and the practicality of discharging requirements.

Additionally, the Inspectorate emphasised the need to ensure that lines of communication are kept open and decisions from all projects shared. The Applicant confirmed that they had met with NGV to discuss the Eurolink programme and the position of the converter station site. It

was noted that NGV have not yet carried out an options appraisal for Eurolink so coordination could not be confirmed at this present time.

The Inspectorate advised that it would be helpful for information known on the timelines of the other projects to be included in consultation documents.

The Applicant reported that both Suffolk County Council (SCC) and East Suffolk Council (ESC) have welcomed co-ordination discussions. The Applicant explained that SCC had noted that a process similar to the Scottish Power Renewables (SPR) East Anglia projects (i.e., a single Examination) may bring benefits in terms of administration. The Applicant noted that it would need to be very clear on pre application co-ordination and would consider how this could be achieved with NGV.

The Applicant explained that this has been communicated to both local authorities who in principle agreed on the converter three 'parking bay' assessment approach as a potential way of facilitating co-ordination, and that each bay would need to be assessed as any of the projects could come first. With regard to mitigation planting, the local authorities favoured the idea of planting around the perimeter of the site, so as to plant near the viewer and not the object. Strategic planting (to be included in the red line boundary), similar to that proposed by SPR for the Friston sub-station, rather than planting per project was also preferred. The Applicant explained that one approach could be purchasing all the required land and then leasing this to NGV. This needs to be further explored.

Matters Arising

The Applicant asked a number of questions relating to the DCO application process:

Draft DCO documents

The Inspectorate explained that it can review the draft DCO, including DCO schedules such as protective provisions/draft deemed marine licence; Explanatory Memorandum; limited sections of the Environmental Statement (ES) such as the project description and overarching assessment methodology; sample Land and Works Plans; Statement of Reasons; Funding Statement; List of other consents and Licences; draft Consultation Report, Navigation Risk Assessment (if one applicable); Draft Habitats Regulations Assessment (HRA) report and Application Index.

The Inspectorate explained that it would prefer at least 2 weeks notice of when draft documents would be submitted and that it would take around 6-8 weeks to review. The Inspectorate advised that it is helpful if the Applicant can highlight any novel matters of drafting or any particular issues it would like comment on.

The Inspectorate asked the Applicant to consider carefully the timing of the draft document submission in light of the documents' maturity and timeline for the DCO application submission, allowing sufficient time to address feedback received. The Applicant noted its intention to reach a 'marine design freeze' in May which could be of relevance. The Inspectorate advised that the documents could be sent via a file sharing site. It was also advised that the Applicant can submit draft documents for review whenever these are available, for instance where some documents are available earlier than other ones i.e., ES (limited sections as noted above). The Applicant should still notify the Inspectorate giving 2 weeks' notice.

Statutory Consultation

The Inspectorate confirmed that the Applicant should satisfy itself in regard to its legal requirement to consult all prescribed consultees, when considering methods of consultation (post/email) and should seek own legal interpretation of the legislation on this matter. Ultimately this depends on the preference of the individual organisation being contacted.

The Inspectorate explained that digital copies of consultation materials are acceptable, but they should not contain links or hyperlinks unless these are government websites, instead the relevant extracts of any referenced document should be provided along with reference list.

Confidential documents and redaction

The Inspectorate explained that anything the Applicant deems as sensitive environmental data i.e., location of sensitive protected species or any confidential information, should be submitted as a separate standalone document and marked as confidential. The Applicant should provide an explanation of why that piece of information is deemed sensitive/confidential. The Inspectorate will not publish the standalone documents and will instead publish a holding page explaining the nature of the document. The Inspectorate advised the Applicant to refer to the [Annex to Advice Note 7 – Presentation of the Environmental Statement](#) for further information about confidential environmental information.

Statements of Common Ground (SoCG)

The Inspectorate emphasised the importance of SoCG and advised that these are generally progressed throughout the Examination of an application. However early progress on any draft SoCG is encouraged. The Inspectorate advised that should draft SoCGs be available upon submission of the DCO application, these can be submitted and final SoCGs submitted when available during Examination.

Advice Note 10 and Environment Agency discussions

The Applicant queried whether the advice in Advice Note 10 regarding parallel consents and applying for permits six months in advance of a DCO application was applicable to all environmental permits to be sought from the Environment Agency (EA). The Inspectorate advised that Applicants need to consider the complexity of the Proposed Development and the technical matters involved in the permit(s), together with the relationship to any European sites and the HRA process. Advice Note 10 is aligned with the advice in the [Environment Agency's Annex D to Advice Note 11](#), which recommends in the majority of cases Applicants should submit permit application(s) to the EA at the same time as the DCO application. However, where an NSIP is proposing to use novel technology and there is limited or no understanding of the best available techniques and/or where a Proposed Development has the potential to affect a European site(s), it is recommended that permit application(s) are submitted at least six months prior to DCO submission. Early engagement with the EA is encouraged to ensure that any complex permitting issues are identified at an early stage and to minimise the risk of requirements under the permitting regime conflicting with works that would be authorised by the DCO. Where permitting is not appropriately coordinated, there is a risk that the EA would be unable to comment on detailed technical matters raised by the Examining Authority during the Examination, and this may be particularly pertinent to complex cases involving HRA matters.

Key Plans and plan scales for marine elements

A brief discussion was held on the best way to show information on plans for the marine element of the proposals, given the large area involved. The Applicant was advised to consider how to make the information as accessible as possible and to make use of a key plan and appropriate scale, and to provide an explanation of the approach taken with the plans to aid comprehension.

Questions / AOB

The next meeting will be held in mid-April, date to be confirmed.