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Sea Link

PINS Pre-Application Planning Services - Programme Document

February 2025

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nationalgrid

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1 Introduction

1.1 Introduction

1.1.0 This Programme Document has been prepared by National Grid Electricity Transmission plc (NGET) as a requirement under the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus in respect of the Sea Link Project.

1.2 Purpose and Structure

1.2.0 This Programme Document sets out the timetable and describes the activities proposed to ensure an effective pre-application process, including the level of pre-application service requested from the Planning Inspectorate (PINS), and consultation with various parties required under the Planning Act 2008 as per the requirements for a Programme Document set out in Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus.

1.2.1 The Pre-application Prospectus was published in May 2024, six months after the close of statutory consultation on the Sea Link project. Therefore, it is not expected that the document will be updated as it would be for projects earlier in the process. The programme has been available on the website throughout development of the project and will continue to be updated as appropriate: [Sea Link | About the project | National Grid Group](#).

1.2.2 This Programme Document is structured as follows:

- Section 1: Introduction and purpose and structure of this document
- Section 2: Background to Sea Link ('the Project')
- Section 3: PINS Pre-application Service
- Section 4: Expected Submission Timeframe
- Section 5: Timeframe of the pre-application process
- Section 6: Main issues for resolution
- Section 7: Engaging with statutory consultees and Local Planning Authorities
- Section 8: Pre-application risks and how these are tracked and managed
- Section 9: Approach to preparing Preliminary Environmental Information (PEI).

2 Background to the Project

2.1 Introduction

- 2.1.0 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 2.1.1 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.
- 2.1.2 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent.
- 2.1.3 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:
- 2.1.4 Schedule 9(1)(a) '...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;' and
- 2.1.5 Schedule 9(1)(b) '...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.

2.2 The Proposed Project

- 2.2.0 The Proposed Project would comprise the following elements:

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).

- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme:

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme:

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

2.2.1 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.

2.2.2 The name 'Friston Substation' will be used throughout the DCO Application solely as a geographic term to identify the site of the substation at Friston. The use of the term is not intended to establish a permanent name for this substation. The Applicant has committed to engage with the local community over a permanent name for this substation and will continue this process in parallel to the DCO Application.

2.2.3 The Project falls within the administrative boundaries of the following local authorities:

- Suffolk County Council
- East Suffolk District Council
- Kent County Council
- Thanet District Council
- Dover District Council.

2.3 Planning Act 2008

2.3.0 The proposed Sea Link project is treated as a development for which development consent is required, pursuant to a section 35 direction issued by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) (as then known) on 31 March 2022.

3 PINS Pre-application Service

3.1 Pre-application Service

- 3.1.0 The Project requested the 'Standard' tier of pre-application service. It is considered the standard level of service will provide the project with an appropriate and proportionate level of pre-application engagement with PINS, reflective of the scale and nature of the project and NGET's level of experience as an applicant.
- 3.1.1 The Project is similar to others within the Great Grid Upgrade and as such, lessons learnt and expertise in producing documentation are available to enable the application to be of a standard acceptable for examination.
- 3.1.2 The standard tier of service will provide the Project with project update meetings, draft document review and risk review.
- 3.1.3 Sea Link was confirmed as being appropriate for the Standard tier by PINS in September 2024.

4 Expected Submission Timeframe

- 4.1.0 An application seeking development consent for Sea Link is anticipated to be submitted in March 2025.
- 4.1.1 The submission date timeframe will be refined as the period of submission draws closer. NGET will provide PINS with regular updates regarding the submission date as the project progresses.

5 Timeframe of the pre-application process

5.1.0 An anticipated timeline of the pre-application process is set out in Table 1 below. The pre application timeframe will be refined, and further detail added as required and as the period of submission draws closer.

Table 1 – Application submission timeframe

Activity	Timeframe (Status)
Non-statutory Consultation	Q4 2022 (Complete)
EIA scoping	Q4 2022 (Complete)
Statutory Consultation	Q4 2023 (Complete)
Further targeted consultation	Q3 2024 (Complete)
PINS and statutory stakeholder review of draft DCO documentation (including draft HRA)	Q3 2024 (Complete)
Further localised engagement	Q4 2024 (Complete)
Adequacy of consultation milestone	Not planned to be submitted due to maturity of project when this approach was introduced. The same details to be provided in the Consultation Report (see 5.1.2)
Advice Log	Not planned to be submitted due to maturity of project (see 5.1.3/4)
DCO submission	Q1 2025 (Planned) (see 5.1.5)

5.1.1 An Adequacy of Consultation Milestone (AoCM) is not being prepared, given the point in time at which that concept came into existence and the stage at which the project had already reached. The Consultation Report will contain all detail around the consultation process. This was discussed and agreed with PINS in September 2024. National Grid has been regularly updating PINS over the years as to its progress including in respect of consultation. The Consultation Report will contain all detail around the consultation process (including comparing to the SOCC), providing evidence to show that the consultation carried out was adequate.

5.1.2 The Pre-application Prospectus also states that PINS will develop and publish an Advice Log, documenting advice provided to applicants. The Section 51 Advice Log for advice provided by PINS after November 2024 is available on the PINS project website. Prior to this date, notes of the regular meetings held with PINS and Section 51 advice provided is available in the form of meeting notes; also available on the PINS project website. Together these documents record all advice provided by PINS

since the first meeting held between PINS and NGET on the project in November 2021.

- 5.1.3 NGET are currently working up its DCO application submission and it will include documents such as a Book of Reference, Statement of Reasons, Funding Statement and Plans.
- 5.1.4 The Consents and Agreement Position Statement is to provide information on the additional consents and licences that are or may be required to construct and operate the project and will form part of the application for development consent order (DCO). An indication of timescales for application are also provided in the document.

6 Main issues for resolution

- 6.1.0 NGET has completed one round of project-wide Non-statutory Consultation, one round of project-wide Statutory Consultation, a further targeted consultation in July 2024, and then localised engagement from November 2024 to January 2025.
- 6.1.1 The main issues set out below reflect the key themes raised by consultees and local communities during the Statutory Consultation in late 2023 and continued through consultation in 2024. Given that Sea Link benefits from the feedback received at that stage, as well as the subsequent ongoing discussion with stakeholders around these matters, this is considered to be an appropriate and transparent means of identifying the main issues being considered by the project team.
- 6.1.2 An issue being listed below is not intended to imply that the Project considers any such issue to be insurmountable or unduly challenging to overcome. They are listed because they reflect the feedback from consultation and ongoing discussions, and these are issues that will continue to be considered and addressed as the project progresses to application submission and beyond.
- 6.1.3 Further consideration is being given to these matters and any others that have arisen as a result of the views received from communities and stakeholders. This programme document will be shared with the statutory bodies in early 2025 but the issues noted below are being continually discussed in the regular meetings with these bodies.
- 6.1.4 An application for a DCO will be supported by documents explaining the consideration of issues arising from consultation and the application of the NPSs. An Environmental Statement will set out how environmental effects have been identified; and measures taken to avoid, reduce, mitigate and compensate for effects.

Table 2 - Issues

Issue	Description of Issue
Alternatives and Good Design (Suffolk and Kent)	Site and route selection and alternatives, including the application of the Holford and Horlock Rules. Consideration of the design of the converter station.
Coastal / terrestrial ecology (Suffolk and Kent)	Assessment of coastal / terrestrial ecology and coastal processes, including effects on Coraline Crag in Suffolk and designated areas in Suffolk and Kent.

Issue	Description of Issue
Landscape and visual effects (Suffolk and Kent converter stations)	Consideration of landscape and visual effects at both converter station sites, and possible mitigation including siting, planting & design approaches.
Heritage effects (Suffolk and Kent converter stations)	Consideration of heritage effects at both converter station sites, and possible mitigating further to trial trenching and assessment.
Socio-economic and tourism effects (Suffolk and Kent)	In respect of onshore proposals, the likely effects on socio-economic receptors, and tourism.
Coordination with other projects (predominantly Suffolk)	Approach to coordinating with various other developers (particularly in Suffolk) including National Grid Ventures.
Proposed access route to converter station (Suffolk)	Approach to accessing the proposed converter station, including considering alternative accesses, the crossing of the River Fromus (including the scale of the bridge and associated heritage and landscape setting impacts), construction traffic, methodology for AILs, local road network, and inter-project traffic effects.
Construction hours (Suffolk)	Working hours of Monday to Friday 0700 -1900 and Saturday, Sunday and Bank holidays 0700-1700 to be included in the DCO. Hours are more restrictive for percussive piling and HGV movements. Consideration of the impact in the area.
Ecology at proposed site for Kent converter station	Ecological effects of proposals, including those associated with the Kent converter station at proposed site near Richborough Substation.
Surface water and ground conditions (Kent)	At the proposed site of the Kent converter station, likely effects in terms of flooding, surface water, and ground conditions.
New overhead line section (Kent)	Ecology and landscape implications of section of new overhead line required to link proposed converter station to the network.

Issue**Description of Issue**

Marine issues

Including benthic ecology, fish and shellfish ecology and marine mammals.

7 Engaging with statutory consultees and Local Planning Authorities

- 7.1.0 NGET has developed a programme of engagement with Local Authorities and other statutory consultees and is engaging in accordance with that programme.
- 7.1.1 NGET began early engagement with the host Local Planning Authorities (LPAs) prior to the Non-Statutory Consultation in Q4 2022. Engagement continued throughout the early stages of the Project including Non-Statutory Consultation, EIA Scoping (Q4 2022), Statutory Consultation (Q4 2023) and targeted consultation and then localised engagement in 2024. The timing and approach to consultation has been being discussed with the LPAs at all stages, including the formal consultation with the LPAs on the Statement of Common Ground (SoCC) in Q3 2023.
- 7.1.2 NGET has been meeting regularly with key stakeholders, on both thematic and issue-specific topics. This has included:
- Monthly meetings with Suffolk County Council & East Suffolk Council
 - Monthly meetings with Kent Council, Thanet District Council, and Dover District Council
 - Separate monthly meetings with Natural England and the Environment Agency.
 - Meetings with Historic England as necessary.
 - Monthly meetings with the Marine Management Organisation
- 7.1.3 Frequent ‘thematic’ meetings with key local authority and advisor group stakeholders
Frequent ‘issue specific’ meetings with key local authorities and relevant stakeholders, as required
- Planning Performance Agreements (PPAs) have been/are being agreed with all County and District Planning Authorities.
- 7.1.4 A Service Level Agreement is in place with Natural England; an Enhanced Advisory Service agreement is in place with Historic England; and a Discretionary Advice Service agreement is in place with the Environment Agency.
- 7.1.5 NGET is also engaging with other organisations such as statutory undertakers, other interest and stakeholder groups, and other infrastructure developers who are progressing DCO projects in the vicinity of Sea Link. Where appropriate, NGET is seeking to agree Statements of Common Ground (SoCGs).

8 Pre-application risks and how these are tracked and managed

- 8.1.0 NGET has held three rounds of consultation and a further fourth localised engagement and intends to make its application in Q1 2025, hence there are limited residual pre-application risks listed below.
- 8.1.1 NGET does not particularly consider that these risks are being or will be realised, subject to the risk management measures that are being undertaken and which are set out in the below table. They are provided however in order to record those areas which NGET considers could introduce delays to the pre-application timescale should the risk profile change.

Table 3 - Risks

Risk	Description of Risk	Tracking and managing risk
Lack of sufficient resource/capacity within host Local Planning Authorities (LPAs) to engage with proposals in detail	Resource availability and/or the volume of DCO projects causing delays in receiving stakeholder inputs or review.	NGET worked with all host LPAs to seek to implement PPAs. Sharing of regular updates regarding project progress and programme.
Lack of sufficient resource/capacity within stakeholder organisations to engage with proposals in detail	Limited resource and capacity of some statutory consultees results in limited engagement on the proposals and inability for statutory consultees to provide feedback throughout the pre-application stage of the project, including Non-statutory and Statutory Consultations.	Early stakeholder engagement. Sharing of regular updates regarding project progress and programme. Where applicable NGET are working with specific consultees to implement paid pre-application services.
Multiple DCOs along/in close proximity to route placing stress on resources of Local Authorities	Numerous developments within proximity of the Project demand additional resource from Local Authorities which could reduce their ability to adequately engage with the Project proposals.	Early engagement with LPAs. Sharing of regular updates regarding project progress and programme.

9 Approach to Preliminary Environmental Information

- 9.1.0 Statutory Consultation was undertaken between September and December 2023, and Preliminary Environmental Information (PEI) was prepared and published during this stage of the project.
- 9.1.1 The Sea Link Preliminary Environmental Information Report (PEIR), at Chapter 5, presents the approach and methodology used in developing the PEI. This makes clear that the Environmental Impact Assessment (EIA) is being undertaken in accordance with a Scoping Opinion, adopted by the SoS on 1 December 2022, following the submission of a Scoping Report on 24 October 2022.
- 9.1.2 There are certain instances where the approach to EIA considers multiple assessment scenarios pertaining to various elements of Sea Link. These instances reflect the ways that the Sea Link project interacts with other DCOs, either made or proposed by other developers. Where multiple assessment scenarios are used, this is to ensure that the assessment is robust regardless of what combination of other DCOs in the vicinity come forward, in what format, and along what timeframe. The scenarios which were considered at the statutory consultation stage were considered in the PEIR, and the scenarios as they develop will be reflected in the ES.
- 9.1.3 Further targeted consultation was undertaken in July and August 2024, and this was accompanied by a proportionate supplementary PEI. The Additional PEI provided further Preliminary Environmental Information ('additional PEI') to support the Project Update Document. It set out the potential for any additional or different likely significant environmental effects associated with the proposed changes to Sea Link, comparing against those presented within the Preliminary Environmental Information Report ('original PEIR') produced in October 2023 and presented at statutory consultation.
- 9.1.4 Localised engagement was undertaken in from November 2024 to January 2025 when a further technical note was produced titled "Additional preliminary heritage information – design amendments in Suffolk". This technical note presented a preliminary assessment of the potential impacts to cultural heritage resulting from the proposed permanent access and bridge crossing the River Fromus required as part of Sea Link.

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom
Registered in England and Wales
No. 4031152
nationalgrid.com