

SEA LINK CHANGE REQUEST 1
OPEN FLOOR HEARINGS 3
10am Tuesday 24 March 2026

The Five Changes: On 5 December the Examining Authority (ExA) accepted [\[PD-015\]](#) the Sea Link Applicant's (NGET) five proposed changes of Change Request 1 [\[CR1-001\]](#). The relevant documents are available in the [Examination Library](#) listed from [\[CR1-001\]](#) to [\[CR1-068\]](#).

Attendance at the Open Floor Hearing: If you are not planning to speak virtually via Teams, SEAS strongly encourages attendance in person at the Suffolk venue; Ufford Park, Deben Suite, Yarmouth Road, Melton Woodbridge IP12 1QW - more info [HERE](#).

The hearing takes place in one day, **Tuesday 24 March**. Even if you are not speaking your presence matters. Please consider attending to observe proceedings, support those presenting and help ensure strong attendance throughout the sessions.

What to speak about: Speak from the heart. There is no need to repeat verbatim your previous submissions, instead concentrate on the **5 change requests outlined below** and weave in your experiences to date from both Sizewell C and East Anglia two (EA2) ScottishPower Renewables' offshore wind farm and what issues Sea Link will add to the cumulative impact; the chaos on the roads, road kill, road accidents; lack of accommodation, high rents; environmental impact, severing essential wildlife corridors; the toll it is taking on yours, your friends and families health.

Preparing your contribution

We suggest you draft your talk, and time it to your allocated 3 mins. If you are a business or represent a group you get longer, 6 minutes. The ExA has issued the days schedule which can be found [HERE](#)

The [Five Changes](#) are:

Change 1: Hoverport, Kent.

On reviewing the proposed changes to the Sea Link project at the hoverport, SEAS share the concerns raised by Kent Wildlife Trust (KWT) that the proposal is premature and not supported by sufficient evidence.

There are no site-specific ecological surveys, so it is unclear what habitats and species are present or how they might be affected. The omission of important saltmarsh habitat from the plans is also concerning, as it makes it difficult to ensure it will be protected. In addition, impacts from construction activities—such as ground disturbance and vehicle movement—have not been fully assessed, despite the risk they pose to habitats and wildlife.

Given that protected species may be present, the lack of survey data means potential impacts and legal requirements cannot be properly addressed. It also appears that the mitigation hierarchy has not been followed, with avoidance and mitigation left too vague and deferred.

While SEAS support the aim of minimising environmental harm, SEAS do not believe this proposal should be approved until proper surveys, clear evidence, and a robust, evidence-based approach are provided.

Kent Wildlife Trust objection can be read [HERE](#)

Change 2: Friston (Kiln Lane) substation

The concern here is that National Grid appears to be seeking to secure a larger footprint for a Gas Insulated Substation (GIS) than is permitted under the Scottish Power Development Consent Orders (DCOs). This issue stems from the fundamental distinction between an Air Insulated Substation (AIS) and a GIS substation.

There is a significant difference in their physical characteristics. Under the Scottish Power DCOs, an AIS substation is limited to a maximum height of 6 metres but typically requires a much larger footprint. In contrast, a GIS substation can reach heights of up to 16 metres while occupying a considerably smaller footprint.

However, due to its substantially greater height, any expansion of a GIS substation is likely to result in a more pronounced landscape and visual impact.

This leads to the central concern: in light of the numerous future connections anticipated at Friston, National Grid may be seeking to establish a position that would enable further expansion of its substation over time.

Friston Parish Council and SASES oppose this change request - their submission can be found [HERE](#)

Change 3: Heritage feature

Albeit this find is not as originally thought, a Neolithic Henge, it shows that the Suffolk coast is full of archaeological importance, some regional some national and some international.

The Applicant originally proposed adding a **30 m buffer** around a suspected Neolithic henge, requiring extra land to route a cable around it. After further surveys in October 2025, the feature was reclassified as a **D-shaped enclosure of regional (not national) importance**, so it doesn't need the same level of protection.

The plans were revised: the **Order Limits now include the enclosure**, allowing either routing through it (with excavation and recording) or avoiding it by routing east. The western extension of land was removed after surveys showed more archaeology there; the eastern extension remains to allow avoidance. This approach is supported by heritage bodies, but further archaeological investigation is welcomed.

East Suffolk Council explains more [HERE](#)

Change 4: Benhall railway bridge

Figure 1 below illustrates the Alternative Northern Access Route put forward by Suffolk County Council (SCC) as a credible way of reaching the proposed Saxmundham Converter Station site. SCC has consistently argued that this northern option has not been adequately considered, even though it avoids the complex constraints of the Benhall Railway Bridge and removes the need for a permanent new bridge and embankments across the Fromus Valley, and reduces impacts on the sensitive landscape around Heritage sites. By making use of existing strategic corridors such as the B1122/Sizewell Link Road alignment, the northern route offers, in SCC's view, a more deliverable and lower-impact option should the Examining Authority find the currently proposed southern route undeliverable. It also reflects a wider principle that major energy developers should coordinate infrastructure planning to minimise cumulative impacts on local communities and landscapes, rather than designing access routes in isolation.

[SEAS](#) supports [Suffolk County Council's](#) objection to the Benhall Railway Bridge access.

Change 5: Maintenance of a new hedge to south of B1119 –

SEAS welcomes the proposal to widen the land south of the B1119 to ensure proper maintenance of the drainage ditch and hedgerow, helping to address concerns about potential flooding. However, this change represents a missed opportunity to strengthen landscape screening, and SEAS is disappointed that the Applicant has not gone further to include substantial tree belt planting to better hide the proposed converter station; there are also concerns about potential impacts on local farmers within the revised area.

More info can be found from [SCC](#) and [ESC](#) CR1 submissions

SEAS Position Statement

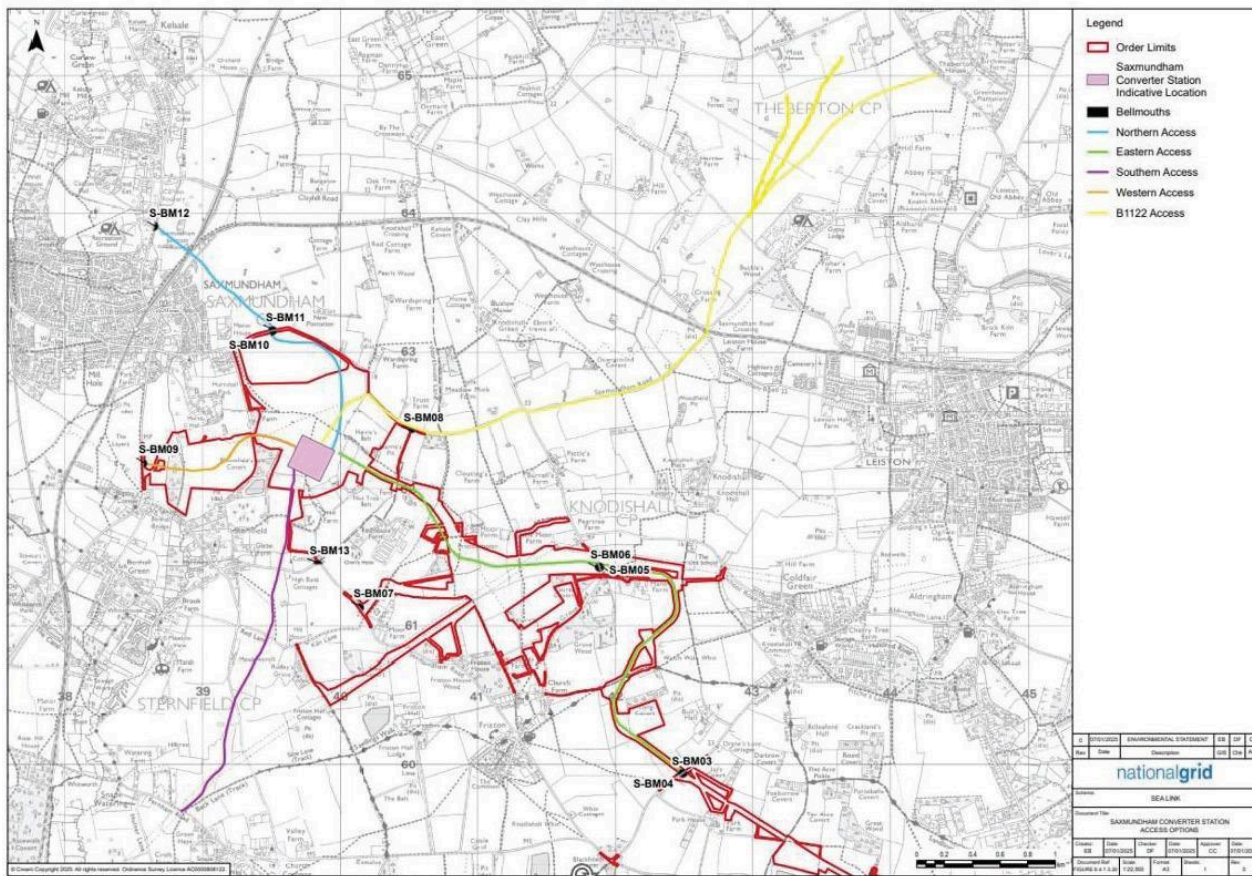
SEAS wishes to state clearly at the outset that it remains opposed to the Sea Link project and would not normally engage in detailed commentary on mitigation measures for a scheme it considers should not proceed. In SEAS's view, a convincing and robust needs case for the project has not been demonstrated. Furthermore, SEAS notes that an alternative solution has been identified which is estimated to cost approximately £250 million, significantly less than the proposed development. Notwithstanding this fundamental objection, SEAS recognises that the Examining Authority must consider the application as submitted. In the event that development consent is granted contrary to the concerns expressed by SEAS and the wider local community, it is essential that the draft Development Consent Order (DCO) and associated control documents secure the strongest practicable mitigation and enforceable protections. This is necessary to minimise harm to local communities, the environment, and other affected receptors. We have therefore made the above comments

Furthermore, SEAS considers these late changes to be indicative of a wider pattern of deficiencies in the Sea Link project. In SEAS's view, the application for a Development Consent Order (DCO) was premature, lacking essential information and supported by research and surveys that were neither sufficiently robust nor comprehensive. In particular, the application failed to include a transparent assessment of reasonable alternatives, contrary to the requirements of EN-1, which requires applicants to demonstrate that "all reasonable alternatives have been properly considered," and EN-5, which requires a proportionate and robust appraisal of routing and site selection. As a result of failing to meet these policy tests, the Applicant has overlooked more suitable landfall and converter station locations and options that would result in significantly lower impacts.

Any problems please contact info@suffolkenergyactionsolutions.co.uk. SEAS are here to help.

Figure 1

Figure 1 – indicative routing corridor (Yellow) in relation to the applicant's red line, the Sizewell Link Road and B1122



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