The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.6 Applicant's Response to the s89 Procedural Decision

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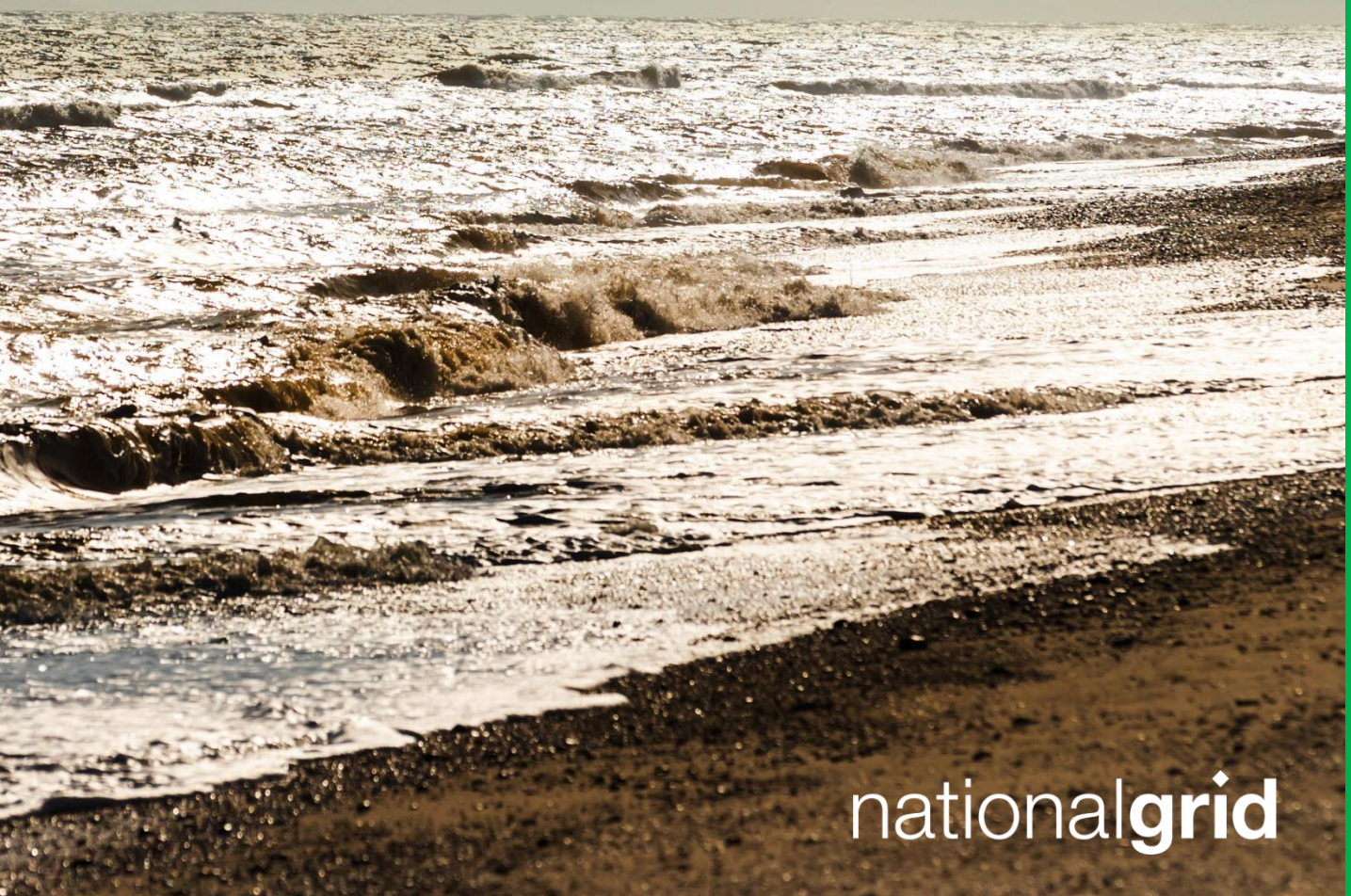

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24th July 2025

Response to Procedural Decision Letter

The Planning Act 2008 (as amended) section 89(3)

Application by National Grid Electricity Transmission (the applicant) for an Order Granting Development Consent for the Sea Link Project

I write in response to your letter dated 8 July 2025 requesting further information for the Sea Link DCO Examination. For ease of reference we have responded using the headings in your 8 July letter.

Bramford to Twinstead Correction Order

The Applicant has submitted an updated version of the draft Development Consent Order in clean and tracked changes along with a schedule of changes made alongside this letter. We also submit a clean and tracked changes version of the Explanatory Memorandum. We have had regard to the changes made in the Bramford to Twinstead Correction Order dated 8 April 2025 and have carried across relevant changes where it is appropriate to do so. These amendments primarily relate to typographical changes in the articles of the draft DCO.

In some instances, it has not been appropriate to include a change, for example where the wording in a particular article of the Bramford to Twinstead Order is not replicated in the Sea Link Order. In addition, there are instances in the Bramford to Twinstead Correction Order where terms such as 'Requirement' or Environmental Statement' have been amended to read in lower case (for example, corrections 51 to 55). Whilst the Bramford-Twinstead Order uses lower case throughout even where terms are defined, these changes have not been brought across to the Sea Link draft DCO to ensure consistency with the

current drafting as it takes a different approach and uses capitalised defined terms throughout.

National Grid 'Friston' substation

The Examining Authority requested seven additional pieces of information on the National Grid 'Friston' substation. Responses are provided below.

1. An update on any progress towards the implementation of the SPR consented substations since the ES was completed, and the likelihood of scenario one or scenario two proceeding

National Grid has been working closely with Scottish Power Renewables (SPR) on the development of the SPR consented substation site, particularly on the National Grid Friston substation. This has included weekly meetings to liaise on design detail, in addition to topic specific and consents meetings. The two teams have been working particularly closely to develop the detailed design of the National Grid Friston substation, produce documents to discharge requirements on the SPR consent on landscaping and drainage and attending key stakeholder meetings on design and draft management plans (e.g. Design Council meetings). This process has been led by SPR as the Applicant for the SPR consents, but with extensive involvement from National Grid. The intention is for information to be submitted to discharge requirements on the SPR consented substations in **Autumn 2025.**

National Grid has also been progressing the tender process to appoint contractors for the construction of the National Grid substation consented under the SPR consent. Construction of the National Grid substation is planned to start on site in **Spring 2026** provided requirements are discharged in time.

Application Document 6.2.1.5 **[APP-045]** Environmental Statement Chapter 4: Description of the Proposed Project states at paragraph 4.2.5 that: *'The current intention is that Friston Substation would be constructed pursuant to the SPR consent (the first scenario). Construction is planned to commence in 2026, likely prior to a decision being made on the Development Consent Order application for the Proposed Project. National Grid is working closely with SPR to provide design information to feed into final management plans and other documents for the discharge of requirements on the SPR consents to enable construction to commence on programme. Under the first scenario, whilst Friston Substation would be constructed pursuant to the SPR consent, as a transmission asset it would be constructed by National Grid as an agent to the SPR application rather than by SPR. The second scenario would only occur if the SPR projects do not proceed and Friston Substation is no longer constructed under that consent. The second scenario is considered highly unlikely to occur.'*

Given the continued progress towards the implementation of the SPR consents, including the National Grid Friston substation, the position presented above in the Environmental Statement remains correct. Scenario one remains highly likely and Scenario two remains

highly unlikely. In Scenario one, Works numbers 1A and 1B would not be implemented under the Sea Link consent.

Since the ES was completed and the application submitted, National Grid has agreed to name Friston Substation as 'Kiln Lane Substation', reflecting the outcome of engagement with local Parish Councils. For consistency with the Sea Link application however, the new substation at Grove Wood, Friston, is referred to as Friston Substation in this letter.

2. A table detailing the 'intentional differences' (ES paragraph 4.2.6 to 4.2.9) between scenario one and two schemes including the connection to the overhead line network, ancillary works, landscaping and surface water drainage proposals.

This detail will be provided in the submission to the Examining Authority in September 2025.

3. A figure overlaying the different scheme scenarios

In terms of the powers being sought in the Sea Link application, the primary difference between the two scenarios is whether Friston Substation and associated overhead line works (Works numbers 1A and 1B in the Sea Link Works Plans **[APP-021]**) are implemented using the Sea Link consent or not.

Application Document 6.4.1.4 (Figure 6.4.1.4.9) **[APP-207]** provides a plan showing the works required for scenario one with annotations showing those works that would not be required under scenario two.

It should be noted that while the powers being sought as part of the Sea Link Project are compatible with the extant SPR consents, they are not identical and generally the SPR powers cover a greater area than those sought by Sea Link. This is partly because the SPR consent includes the possibility of an air insulated (AIS) substation, which requires more land than the gas insulated substation (GIS) design now being progressed and proposed in the Sea Link application. It is also partly because the construction and mitigation requirements of the SPR projects reflect the larger development in this area for which SPR has development consent, which includes the two windfarm substations adjacent to the National Grid substation. This means that in scenario one, the substation, construction compounds, and mitigation may be implemented differently under the SPR consent compared to the 'scenario two' powers sought under the Sea Link Project (i.e. Work number 1A and 1B in the Sea Link Works Plans **[APP-021]**).

Note that while Application Document 6.4.1.4 (Figure 6.4.1.4.9) **[APP-207]** does show the Sea Link scenarios one and two overlaid with one another, it does not show the separate adjacent SPR substations, as these are not part of the Sea Link Project in either scenario. However, visualisations are provided (in response to a separate request in your letter, addressed below) that do show the National Grid substation and adjacent SPR substations together.

4. Clarification of any differences in the design principles used for the application scheme and the SPR schemes

This detail will be provided in the submission to the Examining Authority in September 2025.

5. A table detailing the differences in the design parameters and mitigation measures for the schemes and how they are be secured in the respective DCOs and how they would be secured in the application DCO

This detail on design parameters will be provided in the submission to the Examining Authority in September 2025.

The mitigation measures for three major infrastructure projects are extensive. For example, the Applicant's Register of Environmental Actions and Commitments **[APP-342]** is 84 pages long, the majority of which detail measures to ensure the mitigation hierarchy is applied. The majority of these measures were not specifically written for the small area where the SPR projects and Sea Link project overlap and do not necessarily have directly comparable measures in the SPR consents. The mitigation measures for each project aim to mitigate different effects, so are also not comparable even if similarly worded. Finally, mitigation is secured in the numerous outline management plans submitted with the application; some of which is presented in plans rather than tabular fashion. It is therefore not clear what details could be provided on mitigation in the way requested, but the Applicant hopes the overlay plans and other information in this letter aid understanding.

6. Visualisations with photomontages from representative viewpoints 6, 7, 8, 9, 18, 22 and 23 showing the cumulative effects of the project infrastructure together with the SPR substations

National Grid has been working closely with SPR to produce cumulative photomontages as requested. These visualisations are provided in Appendix A.

The visualisations provided reflect the emerging position under Sea Link scenario one (please see the summary of progress in subsection 1 above). This means that they reflect the above-ground works (the National Grid substation and two windfarm substations) already benefitting from development consent as part of the SPR projects, and which are being designed in accordance with the powers in the SPR consents. In effect, this visualisation shows the substation works that we anticipate being implemented regardless of the Sea Link Project. Note that the visualisations do not show proposed landscape mitigation.

Given that all three substations on the site already have consent under the SPR DCOs, under the most likely scenario (Sea Link scenario one), the majority of landscape and visual effects experienced would be resulting from the already consented project. The additional cumulative effects as a result of the Sea Link project would be very limited as these would be related to the connection and ancillary works only.

In a situation whereby the National Grid substation is implemented under the Sea Link consent but the SPR projects are implemented later (a permutation of scenario two), the National Grid substation element (developed under the Sea Link consent) would be entirely within the smaller works area proposed by Sea Link. As the emerging SPR substation design currently makes use of the more extensive works area available in their DCO powers, the footprint of the National Grid substation being progressed under the SPR consents does not align exactly with what would be developed under Sea Link scenario two. To assist with interpreting this, the works area and parameters sought in Sea Link application are demonstrated by the blue box overlaid over the visualisation. The blue box reflects that used in the visualisations in the Sea Link Environmental Statement **[APP-208 to APP-214],** which show the maximum parameters over the full footprint of the substations and converter stations.

As set out above, as National Grid has been developing the design for the National Grid substation element of the SPR consent, a more detailed representation of how the National Grid substation might look has been provided, compared to what was used in the visualisations in the Sea Link Environmental Statement **[APP-208 to APP-214]**. Using more detailed models can help in reducing the overestimation of effects that can occur when maximum parameters are overlaid on top of one another in a cumulative assessment. This approach is also consistent with the visualisations that were produced for the consented East Anglia One North and East Anglia Two projects, which will aid comparisons.

The model of the emerging National Grid substation design has been used in combination with the models produced by SPR for the two windfarm substations, used with SPR's kind permission. Assumptions have been used where required to complete the visualisations. It must be noted however that due to the complexity of combining two different models, the use of assumptions where necessary, and the fact that the design work is on the substations is still ongoing, these visualisations may be subject to further change.

A figure overlaying the consented outline landscape mitigation (or equivalent) for the SPR consented substations with the outline landscape mitigation for proposed substation for this project

Please see Appendix C for a plan showing the SPR Consented Outline Landscape Mitigation plan (East Anglia One North Application Document Reference: EA1N-DEVWF-ENV-REP-IBR-OLEMS) alongside the Sea Link Outline Landscape Mitigation (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk **[APP-348]**). The Sea Link Outline Landscape Mitigation, including native woodland and tree planting and species rich neutral grassland, was designed to be appropriate for the National Grid substation only as under Friston Scenario 2 (within the Sea Link ES submission). In this scenario the two SPR Substations have not been constructed and the landscaping is not designed to mitigate for the effects of these developments. Some key differences between the plans and the rationale behind those differences is explored below.

The SPR landscaping plan shows landscaping around a larger footprint for the National Grid substation because the East Anglia One North and East Anglia Two consents included sufficient space for an Air Insulated Substation, which has a larger footprint. The Sea Link application only allows space for a Gas Insulated Substation so the landscaping is designed with that smaller footprint in mind. There are also smaller planting areas for the Sea Link landscaping plan in general because it is only mitigating the impact of one substation rather than three.

The proposed woodland and tree planting to the north of the National Grid substation are also in slightly different locations on the two plans to account for the proposed Sea Link cable routes to pass through, whilst being designed to continue to function of such planting areas to limit effects on the surrounding visual receptors. The SPR plan did not allow space for the Sea Link cables as their location was not known when the wind farms were being consented. The construction of the three substations as proposed in the SPR consent would generate significant won material, with the intention that this material could be used on site for landscaping bunds. Significantly less material would be available if the National Grid Substation was constructed in isolation so the Outline Sea Link plan does not currently propose bunds, although it may be possible to include these at a later stage if sufficient material was generated on site. Further information on the function of the Sea Link Outline Landscape Mitigation is provided in section 5.7 in the Outline Landscape and Ecological Management Plan – Suffolk (Outline LEMP) **[APP-348]**.

SPR and National Grid are working together to develop information for the discharge of Requirements on the SPR consents, including development of the landscaping plan proposed to mitigate the impact of all three substations. Extensive consultation is being undertaken on this plan, with the intention that it will be finalised and submitted to discharge the relevant requirements on the SPR consents in **Autumn 2025**. This plan will be more accurate and detailed than either of the existing outline plans shown in the overlay provided.

The final Landscape and Ecological Management Plan for Sea Link will be submitted to discharge Requirement 6 of the draft DCO for Sea Link so will not be produced prior to a decision being made on the Application. However, once the detailed landscaping plan is available for SPR, the Sea Link team aim to update the Outline LEMP to provide information on the landscaping works to be proposed as part of the Sea Link application under Scenario 1. This will likely only comprise very minor additional landscaping works to mitigate for the effects of the cable corridor and other connection works. An updated version of the plan for Scenario 2 will also be provided at this point.

Saxmundham Converter Station

In the letter dated 8 July, the Examining Authority requested that the Applicant prepare fourteen additional photomontages showing the Sea Link project alongside the LionLink converter station by 24 July.

The LionLink project is a National Grid Ventures project at an early stage of development and there is no fixed design or 3D model yet available for the LionLink project. The LionLink project has not yet published a Preliminary Environmental Information Report or carried out statutory consultation. The Applicant understands that statutory consultation on the LionLink project is planned for **Autumn/Winter 2025,** but understand that there is no intention to produce photomontages for statutory consultation. Therefore, no model is yet in production or likely to be available in the near future.

The lack of certainty over the location, design and dimensions of the LionLink project and lack of a 3D model means that it is not possible to produce cumulative photomontages at this stage. Anything the Sea Link team could produce would carry a high risk of inaccurately representing the LionLink project and how the projects may appear together in the landscape. This could hinder rather than assist with assessment of the project against the requirements of Section 104 of the Planning Act 2008.

The LionLink team has been working positively and proactively with the Sea Link team to investigate what can be provided in response to the Examining Authority's request and the Sea Link team is grateful for this assistance. The Sea Link team has reviewed the location of the LionLink converter station as presented in the illustrative masterplan presented on page 22 of Application Document 710: Coordination Document **[APP-363]**. This location was mapped this 2D plan used to provide an indication of the indicative location on visualisations from viewpoints 1, 2, 4, 15 and 18. This approach was agreed with the LionLink team as being the best approach to give an indication of cumulative locations in the context of limited available information.

Viewpoints 1, 2 and 4 were selected because they provide close range views from different angles and because Viewpoint 2 also includes the River Fromus bridge, which is of particular interest to Interested Parties. We have also included viewpoint 15, which is at a slightly greater distance but still with a good view towards the converter station site; and viewpoint 18, which provides a view from the National Landscape and a longer distance view. Given that it is not possible to produce photomontages with any accuracy and that this approach cannot give an indication of massing, we have not produced further visualisations from the other viewpoints listed. A further photomontage was requested from an additional location in the National Landscape, with this visualisation required by 1 September, but the cumulative version produced by 24 July. We can provide a version of this visualisation with the indicative location of LionLink shown on 1 September if that would be helpful.

Given that the cumulative visualisations with annotation have been produced from a plan that is illustrative in nature, these visualisations are highly indicative and are being produced only to assist the Examining Authority in understanding the currently proposed location of the LionLink converter station in the context of the Sea Link project. These visualisations are presented in Appendix C submitted with this letter.

The Planning Inspectorate's Advice on Cumulative Effects Assessment (September 2024, updated March 2025), recognises that the ability to assess cumulative effects with another project is dependent upon the level of certainty about that project. The term 'certainty' refers here to the certainty about project information, not certainty that the project will proceed.

Although the LionLink project had submitted a Scoping Report to the Planning Inspectorate at the point at which the cumulative effects assessment was prepared for the Proposed Project, the amount of detail it included, in terms of location, design, and construction information, was limited and no more than was presented in the supplementary non-statutory consultation. The Planning Inspectorate's advice recognises the challenge presented when assessing cumulative effects where there is a lack of project information. When setting out the information that is expected to be compiled to inform Stage 4 (the main assessment stage) of the cumulative effects assessment, it states (our emphasis):

*"The applicant is expected to compile **detailed information** to inform the Stage 4 assessment. The information should include but not be limited to:*

- *proposed **design** and **location** information*
- *proposed **programme** of construction, operation and decommissioning*
- ***environmental assessments** that set out **baseline data** and **effects arising** from the other existing and, or approved development"*

No such detailed information was available to inform the cumulative effects assessment other than potential cable corridors and a 'search area' for the Converter Station. No locations, fixed dimensions, or design details were available for any proposed permanent above ground infrastructure and very little construction information was available, other than that construction was expected to begin in 2026, with completion expected in 2030 (though noting that the Scoping Report also stated that "*The ES will be based on a construction programme identified by construction year rather than specific calendar year e.g. Year 1, Year 2 rather than 2026, 2027*"). There is no information yet available on potential likely significant effects of the project or any proposed mitigation because the project has not yet been through its statutory consultation, and no preliminary environmental information has therefore been published.

The Environmental Statement considered cumulative impacts with LionLink as far as was appropriate and proportionate, in line with the Planning Inspectorate's Advice, given the lack of certainty and information available. A Zone of Theoretical Visibility (ZTV) was produced based on an indicative height of 26m for the LionLink converter station in the location shown in the illustrative masterplan referenced above (see Application Document 6.4.2.1 Figure 6.4.2.1.11 C **[APP-219]**). However, this ZTV is an indicative tool to aid assessment, with significant potential for change given the uncertainty over both location and height of facilities.

Air quality modelling

The Examining Authority (ExA) has requested that a sensitivity analysis for the Kent and Suffolk air quality modelling is conducted to account for an updated Emission Factor Toolkit (EFT).

A Technical Note is appended to this letter (**Appendix D**) that presents the results of the sensitivity test and the impact on nitrogen dioxide (NO2) and particulate matter (PM10 and PM2.5) predicted concentrations for both the Kent and Suffolk Proposed Projects. The Technical Note demonstrates there is generally a very small increase in NO_2 predicted concentrations in the Do-Minimum (DM) and Do-Something (DS) scenarios with a maximum increase of 1µg/m3 across both the Kent and Suffolk Proposed Projects. The change in PM10 and PM2.5 predicted concentrations as a result of the updated EFT is negligible at all receptors, for each scenario across both the Kent and Suffolk Proposed Projects and this change does not affect either the Proposed Project's ability to comply with any Air Quality Strategy (AQS) objectives or limit values. The outcome of the original report remains unchanged.

Similar designs of converter stations and substations

The ExA has requested confirmation from National Grid of one or more suitable sites of comparable dimensions, technology and lighting lux levels.

All operational sites on the network are bespoke to some degree, reflecting the technical requirements, context, and development history specific to each. However, while not exactly the same as the proposed Sea Link works, the suggested site visit locations are sufficiently similar to Sea Link to be effective in illustrating the overall scale and nature of what is being proposed.

With regard to substation examples, Richborough 400kV Substation and Littlebrook 400kV Substation are both located in Kent. The site at Richborough is located within the Richborough Energy Park (the former site of Richborough coal fired power station), approximately 1km from the proposed Sea Link site. This location offers the advantage of being able to see how Sea Link would interact with the existing energy infrastructure in this area (Sea Link is proposed to connect directly into the existing 400kV overhead line running from Richborough Substation). The exterior of the existing Nemo Link converter station at Richborough Energy Park can also be seen from Richborough Substation, and although this converter station is smaller than those proposed as part of Sea Link, it is indicative in terms of audible noise and lighting lux levels. The Richborough Substation is not publicly accessible for safety and security reasons, and there is no suitable publicly accessible vantage point to view the site. Littlebrook Substation is located on the south bank of the River Thames, close to the Dartford Crossing. The facility which came into operation in 2024 enables the transmission of 2GW of energy from interconnectors and offshore wind farms

off the coast of Kent. While Littlebrook is also not publicly accessible, it is close to the public highway and so may be viewed for the road and adjacent footpath.

Converter stations that are of a similar design and comparable scale which are suggested as feasible options for a site visit include National Grid Ventures' (NGV) Viking Link converter station at Bicker Fen in Lincolnshire and NGVs North Sea Link converter station, located in Northumberland. The Viking Link facility entered operation in 2024, is of a similar scale and in a rural setting. Viking Link utilises the same technology as is proposed for Sea Link as is the closest example in terms of size, scale, noise and light. Alternatively, North Sea Link which entered operation in 2021 may serve to demonstrate more effectively how a site with more established landscape mitigation measures fits within its setting. Viking Link is set 2km away from the nearest publicly accessible viewpoint, however, North Sea Link is close to a pubic highway.

Details of these substation and converter station facilities, including a high-level comparison of infrastructure and ancillary features with the Sea Link design are set out in Appendix E. Please note, however, that neither of the above converter station facilities are within the Applicant's control, meaning that access will be at the discretion of the operator (NGV). We have made NGV aware of the potential for a visit being requested. Similarly, while the substation sites are operated by NGET, they are not accessible to the public. Should the Examining Authority's wish to actually enter the sites, we would therefore ask that they coordinate the visit with the Applicant even if the actual visit is an unaccompanied one.

Marine mammals

The Applicant confirms that the Pegwell Bay seal baseline is sufficiently representative of the peak abundance.

The current baseline for seal abundance and distribution is derived from a comprehensive review of the most up-to-date literature sources, including key reports such as Carter et al., 2022, Cox et al., 2020, ZSL (2021), SCOS (2022), and other peer-reviewed publications. These sources provide robust and credible data on population estimates for the region, consistent with accepted best practice for abundance surveys, largely aerial survey approaches.

ZSL undertake targeted aerial surveys of the Greater Thames Estuary including at Pegwell Bay, making counts of seals in the optimum survey months for pupping and haul-out abundance, in July and August respectively. Data from the most recent ZSL Greater Thames Estuary survey, undertaken in 2024, is yet to be published.

Based on the approach outlined above (and described in **APP-077 Part 4 Marine Chapter 3 Marine Mammals**), the Applicant can confirm that the seal baseline presented in the

application uses the best available evidence of seal abundance by area, determined from systematic surveys.

However, for the Pegwell Bay seal population, whilst there were data for the number of animals present there was little information found to identify exactly where the seals, particularly those hauled out, were located. On the basis of predicted activities required within Pegwell Bay for the Sea Link project, and the associated potential for visual and air-borne sound disturbance to seals, it was determined that some survey work should be undertaken to identify exactly where in Pegwell Bay the seals were located. This information could then inform the impact assessments of potential disturbance.

Thus, the primary aim of the project-specific boat-based surveys in September to November 2024 was to identify and map haul-out locations of seals within Pegwell Bay and the River Stour. This would enable the Applicant to assess the spatial relationship between potential project activities and disturbance to seals. While seal numbers were recorded during these surveys, this was supplementary and not intended to replace the abundance figures derived from aerial surveys reported in the literature.

The earliest survey that could be procured was September 2024 and a further two surveys were undertaken in October and November 2024. Seals were observed to be present in the same location, hauled out on a small number of low tide mudflats within the channel of the River Stour, on all three surveys. In addition, the edges of the main bay were also observed using binoculars, but no suitable locations that could support hauled out seals were seen outside the river channel.

The survey operator, River Runner, also provided corroboration on the project survey observations. This company undertakes seal sighting surveys for the public, travelling from Ramsgate, across Pegwell Bay and into the river, several times a week, where weather allows, throughout the year. The owner of the boat has many years of experience observing seals in this area. On the basis of the consistent findings of the three surveys and the corroborating information from River Runner it was considered sufficient data had been collected to confirm the location of seals in the Pegwell Bay region.

However, as August is considered to be the optimal month for the number of seals hauled out, the Applicant proposes an additional survey in August 2025. This will add to the body of evidence in relation to the location of seals around Pegwell, to determine if there are any differences in haul-out locations when the abundance of seals is thought to be at peak. This will supplement the surveys that have already been completed.

The August 2025 survey will repeat the methodology used in 2024, including use of the same vessel and binocular-based observations to record seal presence and locations both

on the mudflats at low tide and in the water at high tide. This survey will complement the existing dataset and ensure coverage of the August haul out locations, for comparison with previous observations on seal locations and distributions.

The Applicant confirms that the seal surveys in Pegwell Bay are conducted in a way that minimises disturbance to seals. River Runner is the first tour boat in Kent to be WiSe accredited. WiSe is the UK's National Training Scheme For Minimising Disturbance To Marine Wildlife. River Runner's crew are Standard WiSe certificated, which means they are trained in interacting safely and minimising the disturbance to marine and coastal wildlife including seals.

We can also confirm that the most recent JNCC guidance documents, 2025, have now been referenced and have been included in the edits for the updated Marine Mammal Chapter.

Land rights tracker

I can confirm that, as requested, a meeting to discuss the final format of the Land Rights Tracker has been arranged for Thursday 24 July from 11.00am – 11.30am.

Commercial Fisheries

A number of data and information sources were used to inform the baseline as presented in **Table 8.1** of **App-204.** The key data source relied on to inform the baselines presented in the Commercial Fisheries chapter of the Environmental Statement (ES) [App-81] and the Commercial Fisheries Technical Report (technical report) [App-204] was the UK fleet landings datasets for the Study Area (ICES rectangles 31F1, 32F1, and 33F1), published by the Marine Management Organisation (MMO) in 2023 (covering data for 2018 – 2022 (MMO 2023)).

As noted by the ExA more recent data has become available since submission of the application including UK landings data covering 2019-2023, which were published by the MMO in December 2024. However, due to the timing of the submission of the Sea Link application, this 2024 data set was not available for inclusion in the baseline.

Despite the 2024 data not being included in the baseline, the Applicant confirms that the baseline that is presented in the application (based on the 2023 data) is sufficiently up to date.

The purpose of the Commercial Fisheries Assessment is to appraise the potential for significant impacts to occur on established, and traditional fisheries in a conservative and precautionary manner, as informed by the baseline. The multi-year nature of the baseline data serves to represent longer-term fisheries trends, and thus enable meaningful changes

to commercial fisheries to be identified. Any substantial changes identified in the single year update the 2024 landings dataset would potentially represent single-season trends that could not be confidently confirmed as significant impacts to traditional, established fisheries. Placing too much weight on any single year differences would be likely to contradict a conservative and precautionary approach.

In the interest of diligence, the differences between the 2023 (covering 2018 - 2022) and 2024 (covering 2019 - 2023) landings data have been reviewed. This process identified extensive similarities in data trends and concluded that updates to these data are not required as these would not change the outcomes of the assessment. These outcomes include the potential for moderate effects (significant) to occur on some static fisheries, and the embedded and additional mitigation measures that would minimise the impacts to all fishers to at worst, minor levels of significance (not significant).

Other matters or errata

The Applicant notes that the Acceptance process and the initial round of Relevant Representations have identified the need for a limited number of errata type corrections. Whilst the number of errata and other issues are quite limited, particularly in the context of the number of documents and complexity of the application, and the fact that the documents have already been assessed to be of a satisfactory standard, as requested, submit clean and tracked change versions of the following documents are submitted:

Table 1: List of Submitted Revised Application Documents

Document	Change from Document Previously Submitted
Draft Development Consent Order	The draft DCO has been updated, where appropriate, to incorporate the wording of the Bramford to Twinstead Correction Order.
Explanatory Memorandum	This document has been updated to explain the above change to the draft DCO.
Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity	This document has been updated to refer to American mink (‘Neovison vison’).
Part 4 Chapter 4 Marine Mammals	This Chapter has been updated to refer to grey seal rather than harbour seal as the primary reason for designation of the Berwickshire and North Northumberland Coast Special Area of Conservation (SAC)

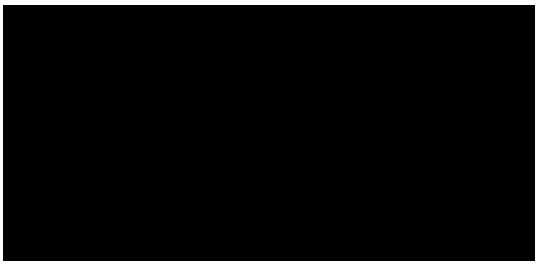
Document	Change from Document Previously Submitted
	and Table 4.15 of document 6.2.4.4, part 4, chapter 4 Marine Mammals [APP-077] updated. On addition to this the most recent JNCC guidance documents, 2025 have now been referenced and have been included in the edits for the updated Marine Mammal Chapter.
Application Document 6.3.3.5.D Kent Generic Quantitative Risk Assessment – Part 1 of 2 [**APP-278**].	An uncorrupted version of the original document is submitted.
Biodiversity Net Gain Feasibility Report	As request the following appendices to the Biodiversity Net Gain Feasibility Report are submitted. • Appendix A Site Location Plans; • Appendix B BNG Baseline Habitat Plans; Appendix C Post Developments Habits Plans.
Application Document 6.4.4.4 ES Figures Marine Mammals	An updated version of the report is provided correcting the figures previously used.
Application Document 7.1 Planning statement	This document has been updated to provide the correct reference.
Application Document 7.5.6.1 Outline Landscape and Ecological Management Plan – Suffolk	An updated version of the report with the figures in the correct sequence is provided.
Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent	The reference in Figure 5 has been corrected to ‘Friston Substation’.
Navigation Document	This document has been updated to reflect the updated documents as set out above.

Table 2: List of Appendices to this letter

Appendix 9.6.1	Appendix A: Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston
Appendix 9.6.2	Appendix B: Consented SPR Outline Landscape Mitigation Overlain with the Sea Link Outline Landscape Mitigation for NGET Substation (Scenario 2)
Appendix 9.6.3	Appendix C: Visualisations showing the indicative location of the Lionlink converter station alongside the Sea Link converter station
Appendix 9.6.4	Appendix D: Sensitivity analysis for the Kent and Suffolk air quality modelling to account for the updated Emission Factor Toolkit
Appendix 9.6.5	Appendix E: Details of Similar designs of converter stations and substations

I trust that the attached information is satisfactory and note that you have requested further information from us by 1st September, which we will look to provide you with by this deadline.

Yours sincerely,



Senior Project Manager
For and on behalf of National Grid Electricity Transmission plc

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