The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.72.1: Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1

Planning Inspectorate Reference: EN20026

Version: A
November 2025

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1. About this Document

1.1 Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Action Points addressed to the Applicant arising at Issue Specific Hearing 1 (ISH1) held on 11 November 2025, in respect of the Sea Link Project.

1.2 Structure

The Examining Authority (ExA) issued a list of action points during the Hearings and subsequently published them in written form on 12 November 2025, **Action Points arising from Issue Specific Hearing 1 (ISH1) on the scope of the development held on Tuesday 11 November 2025 [EV3-007]**. This document provides responses to those actions, due at Deadline 1, that were specifically addressed to the Applicant. Where appropriate, the Applicant has made minor stylistic or grammatical adjustments to the wording of the action points for clarity; however, these changes are not considered material and do not alter the substance of the actions or the Applicant's response.

2. Applicant's Response to Issue Specific Hearing 1

2.1 The Applicant's Response to Actions Table

Table 2.1 Response to Issue Specific Hearing 1 (11 November 2025)

Action No.	ExA Description	Applicant's Response	Deadline
AP1	Post hearing submission covering all the points made during item 3 of the agenda covering need.	**Need Case Summary** Sea Link will provide vital network capacity to do two key things: 1. At times of low wind and high interconnector imports, it will provide an additional route for power to flow out of Kent. Sea Link must connect no further west than Canterbury North Substation because Sea Link's role is to provide another way for power to flow out of Kent in a scenario where there is a fault between Canterbury and Kemsley. 2. At times of higher wind it will provide an additional route for power to flow out of East Anglia into the network. Sea Link must connect in the Sizewell area in order to enable power transfer from the Sizewell Generation Group in a scenario where there is a fault between Sizewell and Bramford. Sea Link is not taking power to London, the proposed project must bypass the network around London, Kent, and the Thames Estuary, which reduces the potential for bottlenecks on the network in these areas, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As a high voltage direct	Deadline 1

current (DC) link can be configured to transfer power in both directions, Sea Link can benefit multiple areas in the East Anglia and South East regions.

Solving various issues together meets National Grid Electricity Transmission's obligation to develop a "efficient, coordinated, and economical system of electricity distribution and transmission". This is a statutory obligation under the Electricity Act 1989.

Clean Power 2030 Report

The Clean Power 2030 '*Advice on achieving clean power for Great Britain by 2030*' Report (November 2024) is the National Energy System Operator (NESO) analysis of what it considers to be the pathway to a clean power system by 2030.

This report states that a major network expansion is needed to achieve this, and specifically that Sea Link is critical for the achievement of the Clean Power 2030 target. It also states that the delivery date for Sea Link required acceleration (from its licenced connection date in 2031 to its earliest in-service date of 2030). The report states that without Sea Link, consumers could face an extra £1.4b in constraints costs in 2030.

The Clean Power 2030 has not changed the plans for Sea Link, it only highlights the importance of delivering.

Need considering other proposed and consented schemes

Other National Grid Electricity Transmission projects

In addition to the specific needs addressed solely by Sea Link, namely the need to facilitate further power flows out of Kent and the Sizewell Generation Group in East Anglia, the Sea Link project also makes a vital contribution to the wider need to provide further power flows out of East Anglia as a region.

In meeting this wider regional need, Sea Link will operate alongside other proposed and consented National Grid

Electricity Transmission reinforcement projects, including the consented new overhead line between Bramford and Twinstead and the proposed new overhead line between Norwich and Tilbury.

Other third-party developer projects

Other proposed and consented schemes being developed by third parties, for example Sizewell C (EDF/UK gov), the LionLink interconnector (National Grid Ventures) and the East Anglia One North and East Anglia Two windfarms (Scottish Power Renewables), contribute to the contracted generation that National Grid Electricity Transmission is obligated to accommodate on the transmission network.

Offshore grids

Role of Sea Link in delivery of 'offshore grids'

Sea Link is already an offshore project. The need for Sea Link is anchored in strengthening the onshore transmission system and so necessitates connecting into the onshore networks in the South East and East Anglia. Other than the onshore works necessary to do this, the majority of the Sea Link project (approx. 122 km) is offshore.

Although not directly relevant to the Sea Link needs case, the concept of an 'offshore grid' generally relates to multiple offshore windfarms connecting together offshore to reduce the amount of onshore infrastructure. This is a wider network design point and is beyond the remit of National Grid Electricity Transmission or Sea Link.

However, this has already been considered by the NESO in its Holistic Network Design (HND) exercise in 2022. The outcome of the HND was a network design that combined coordinated and radial windfarm connections in the optimal way.

This is being implemented, and Sea Link is identified by the ESO, via its Network Options Appraisal (NOA) process, as critical to delivering the HND network design.

Wider 'offshore grid' considerations

There is no such thing as a truly offshore grid, bearing in mind that all power generated offshore needs to come onshore to the network at some point. The more power that is pooled offshore, the more cables and onshore infrastructure that are needed to bring that power onshore. For example, in Germany and the Netherlands, TenneT are proposing 14 HVDC projects to bring wind power onshore, each project requires 3 cables to come onshore and a converter station onshore. So the TenneT offshore grid brings a minimum of 21 cables ashore and 14 onshore converter stations. Additionally, wider onshore network reinforcements projects are also being proposed in both countries.

There are also technical challenges associated with offshore direct current (DC) technology that influence the extent to which connecting multiple generators into DC networks is feasible. For example, there are no commercially available circuit breakers for a DC network, meaning that the amount of generation that can be connected to a DC network is limited to below the amount that would cause network issues if it was lost at once (currently 1800MW).

Regardless of the technical constraints, there are also significant environmental, shipping, and other constraints in the offshore environment which need to be considered when considering whether additional offshore infrastructure may be beneficial.

These constraints are reflected in the HND, which already reflects a coordinated transmission network design.

Offshore Coordination Support Scheme (OCSS)

An offshore interaction between Sea Link and the proposed North Falls and Five Estuaries windfarms was explored through the Offshore Coordination Support Scheme (OCSS) process between 2022 and 2024.

This comprised a review of the feasibility of connecting the North Falls and Five Estuaries offshore windfarms with Sea Link in the offshore environment, rather than into an onshore connection point.

The outcome was that if this coordination went ahead, it would undermine the ability of Sea Link to meet the needs case and additional reinforcement projects would be needed to secure the system against faults. Therefore, this would have resulted in more onshore infrastructure than is proposed for Sea Link in East Suffolk and in either Essex or Kent, not less.

Other points raised by Interested Parties on Need

Local demand in East Anglia

The need for Sea Link is not driven by the local demand in East Anglia. Although some power is consumed locally, the needs case for Sea Link is driven (in part) by the need to reinforce the network to take power from existing and contracted generators and interconnectors from connection points in East Anglia into the wider network.

Status of Nautilus connection offer

National Grid Ventures' Nautilus interconnector had a connection offer at Friston until March 2025 (weeks before the submission of the Sea link DCO application). While it had a connection offer, National Grid Electricity Transmission was required under its licence to consider a potential Nautilus connection at Friston. Recognising that National Grid Ventures no longer has this connection offer, removing Nautilus does not

		change the conclusions of the needs case in East Anglia. In summary, this is because there is still a shortfall in capacity out of the Sizewell Generation Group, and from the East Anglia region generally, with or without Nautilus. *Connection offers* The process for making connection offers is overseen by the NESO. Generators apply to the NESO for connections to the transmission system, and the NESO makes a connection offer to the generator. The NESO has its own processes for assessing connection applications and the location and timing of connection offers, but this includes consideration of the location of generation, capacity of the existing transmission network, and the costs of investing in reinforcement projects considered against the costs of constraining generation using constraints payments. These would have been considered by the NESO when the connection offers were made for the East Anglia One North (EA1N) and East Anglia Two (EA2) windfarms and the LionLink interconnector. Connection offers are not conditional on having consent to build.	
AP5	Update on Friston substation and justification for the continuing inclusion of scenario 2 in the examination.	Friston substation is an essential component of the Sea Link project, being the means by which power is transferred from Kent into the network in Suffolk and transferred from Suffolk to the offshore cables to Kent. It is not an option for the Sea Link project to be delivered without Friston substation - it is an integral part of the project. The Applicant does not currently have the consents or land rights to develop Friston substation, nor does it have the ability to discharge requirements on the Scottish Power Renewables (SPR) consents. Therefore, without inclusion of Friston substation within the Sea Link project DCO, the Applicant would not have certainty that the project could be delivered. Therefore, these works must be included in the DCO application and Scenario 2 must be examined in full. This	Deadline 1

position has been articulated to the Examining Authority in letters submitted into the Examination (e.g. see page 6 of **[AS-084]**) and verbally at Issue Specific Hearing 1 (see 08:48:00-10:05:03 of the Transcript of Issue Specific Hearing 1 (ISH1 – Part 2) **[EV3-006**]).

At Issue Specific Hearing 1, SPR supported the Applicant on this point, reiterating the position that NGET does not have the powers to build the 'National Grid substation' and that whilst agreements were progressing, it was not anticipated that transfers of benefit would be completed before Spring 2026 (see 14:36:19-15:17:29 of the Transcript of Issue Specific Hearing 1 (ISH1 – Part 2) **[EV3-006]**). SPR also noted that the transfer of benefit from SPR to NGET *'may or may not be complete by the time you finish this examination'*.

This position was also supported by Suffolk County Council at ISH1, with Suffolk County Council stating on the need for Scenario 2 that '*as matters sit today there is still a case for scenario 2 to be included in the examination but that this may very well change during the currency of the examination and before we get to May 2026.'*

The Applicant agrees with the point made by SPR and the timescales indicated for resolving the transfer of benefit agreement. The Applicant is also grateful for SCC for clarifying that they agree that Scenario 2 needs to be examined at present. However, as explored below it should be noted that it is not only a transfer of benefit agreement that would be required for the Applicant to remove Scenario 2 from the application and the Applicant does not think it likely that all necessary matters are likely to be achieved by the end of the examination, as explained further below.

Although Friston substation will be designed, constructed and operated by National Grid Electricity Transmission (NGET), NGET was not the Applicant for either EA1N nor EA2, neither is NGET an undertaker named as benefiting from the DCOs for either EA1N or EA2. This creates a situation where at present

the party with the land rights and consents for Friston substation cannot build or operate it (as it must be a NGET asset), but NGET also cannot build or operate it because it does not have the powers to do so. NGET similarly cannot discharge the requirements on either the EA1N or the EA2 DCOs that must be discharged prior to works starting on site, because NGET was not the Applicant for the wind farm applications nor is NGET an undertaker for the purpose of the SPR DCOs. The Applicant is working closely with SPR to get all agreements in place to enable construction of the substation, but as reiterated by the Applicant, SPR and SCC, the parties are not yet in a position where these are agreed.

In order for the Applicant to be in a position to consider removing Work Numbers 1A and 1B from the application (thereby removing Scenario 2), the following would be required as a minimum:

- A completion of a transfer of benefit agreement that affords NGET the irrevocable statutory powers needed to deliver the substation (i.e. build, operate, maintain and decommission);

- A land agreement to provide NGET with all land rights required (both permanent and temporary) to deliver the substation, which in turn first requires Scottish Power Renewables to have acquired the same.

- Satisfactory evidence and assurances from SPR that all of their DCO requirements have been discharged and/or complied with and lawful first site access could be granted; and

- Satisfactory evidence and assurances that there are no other dependencies outside of NGET's control that could affect the lawful delivery or retention of the substation by NGET under the SPR consents.

Whilst all agreements are progressing, without all the above in place National Grid would be reliant entirely on a third party for the delivery of a material element of a critical and urgent national infrastructure project; a position that is not acceptable or in the public interest. At present none of the above criteria are met.

The above criteria would all need to be met to such an extent that no decision by SPR or another party could prevent the completion and operation of the substation. Whilst it is possible that this could occur prior to the end of the Sea Link Examination, the Applicant does not consider that it is likely. In the hypothetical scenario that all criteria were met in Spring 2026, this would be very close to the end of the Examination and even in that scenario (which is considered unlikely) the simplest solution may be for National Grid to agree not to implement Work 1A and 1B rather than to remove these works from the application.

To illustrate the complexities here, there are 44 requirements on the DCO for EA2, many of which could affect the programme for construction of Friston substation. For example, requirement 43 of the EA2 DCO states that:

'*No part of the grid connection works may commence under this Order until either— (a) the offshore works have commenced; or (b) the undertaker has provided appropriate evidence to the Secretary of State demonstrating its commitment to commence the authorised development described within paragraph 1 of Schedule 1, Part 1 and the Secretary of State has confirmed that the grid connection works may commence.*'

This means that the programme for construction of Friston substation and Sea Link as a whole under Scenario 1 is dependent entirely on SPR either commencing development of the offshore works associated with the wind farm; or on SPR providing evidence of a commitment to commence. NGET does

not have the power to influence either of these things, which relate to works outside the Sea Link project.

It should be noted that there are precedents for the inclusion of the same works in more than one consent and it is neither unnecessary or disproportionate to do so. In particular, Friston substation was included in both the EA1N and EA2 consents. This was accepted despite the fact that Scottish Power Renewables wholly owns EA1N and EA2, so has control over the requirements, land and consents required for the substation under both consents.

Another example is a new 400/132kV Grid Supply Point (GSP) substation in Essex that was consented under the Town and Country Planning Act 1990 in April 2022 (reference 22/01147/FUL) and included in the DCO application for Bramford to Twinstead Reinforcement (EN020002) consented in September 2024. The Planning Statement for the Bramford to Twinstead Reinforcement states that *'for the purposes of a complete assessment of the effects of the proposed development and as a consenting fall-back position, the GSP substation is also included in the application for development consent.'* (page 62, Document 7.1 Planning Statement (issue B), December 2024, Bramford to Twinstead).

The justification for inclusion of Friston substation in the Sea Link application is far stronger than in either of the above examples, because National Grid is not the Applicant for the EA1N or the EA2 consents.

It is also common for the Order limits of projects to overlap, particularly at substations given that by their very nature they are locations where several major projects connect and overlap. For example, Gate Burton Energy Park (consented July 2024), Cottam Solar Project (consented November 2024) and Tillbridge Solar Project (consented October 2025) all include a significant section of cable corridor and the National Grid Substation at Cottam in their Order limits. This complexity

		was managed by the Examining Authorities in the three respective Examinations. Finally, the principle of incorporating works and land rights into an application in the context of the progression of voluntary agreements is standard practice. Indeed, most DCO applications seek compulsory acquisition powers over land to provide certainty on delivery even when voluntary agreements are well progressed or even signed over some or all of the land. To the extent that the Examining Authority is suggesting that this would be inappropriate in the present case, that is contrary to very well-established standard practice.	
AP7	Update as to when LionLink Preliminary Environmental Impact Report will be provided and when further detail of the converter station will be available for cumulative visual effects.	The Applicant and National Grid Ventures (NGV) are separate organisations, and National Grid Electricity Transmission has no control over the processes of NGV. However, NGV has stated to the Applicant that they intend to commence their statutory consultation on 13 January 2026 and run until 10 March 2026. NGET is working with NGV to understand the interactions between the projects. The organisations have positively worked together to site the converter stations together to minimise cumulative impacts. Statutory consultation requires the preparation of preliminary environmental information, typically in the form of a Preliminary Environmental Information Report (PEIR) to support the consultation; as such we anticipate the PEIR for LionLink being available at the commencement of statutory consultation in January 2026. The Applicant's understanding is that there will not be a 3D model of LionLink available to create cumulative photomontages during their statutory consultation. NGV has stated to National Grid Electricity Transmission that any visual material generated for statutory consultation will be indicative in nature because it may evolve as a result of consultation, further design and environmental assessment. NGV's view is that material developed would not be suitable to inform	Deadline 1

		photomontages that fulfil the Guidelines for Landscape and Visual Impact Assessment requirements and National Grid Electricity Transmission shares this view. This means the material is not suitable for cumulative photomontages for an Environmental Statement. National Grid Electricity Transmission is not able to develop a 3D model for another developer's project, nor would it provide an accurate depiction of cumulative visual impacts to do so. It is common for projects considered in the cumulative impact assessment of an Environmental Impact Assessment to develop and evolve following submission of a DCO application. Provided the PEIR is published in January as planned, the Applicant would propose to submit a Technical Note considering whether the new information would change the assessment of likely significant effects reported in the Sea Link Environmental Statement.	
AP8	Explanation as to whether significant adverse intra-project cumulative impacts are moderate or major. Please clarify in the absence of this information, how the applicant considers that the Secretary of State (SoS) can reach a reasoned conclusion of the significant effects of the proposed development on the environment.	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require the identification of significant effects, but do not require these to be given a level of significance: Regulation 5 (2) states that: *The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—* *(a) population and human health;* *(b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(a) and Directive 2009/147/EC(b);* *(c) land, soil, water, air and climate;* *(d) material assets, cultural heritage and the landscape;* *(e) the interaction between the factors referred to in sub-paragraphs (a) to (d)*	Deadline 1

The approach to intra-project cumulative effects assessment followed by the Applicant does not include a mechanism for determining whether significant intra-project cumulative effects are moderate or major.

EIA generally reports four levels of adverse (or beneficial) effect, these being negligible, minor, moderate, and major. Of these, moderate and major effects are typically considered to be significant.

Intra-project cumulative effects occur when two or more separate effects combine, potentially resulting in an effect of increased intensity. The individual effects that may ultimately combine are different in nature, resulting from separate types of impact. A typical hypothetical example of an intra-project cumulative effect is the overall effect on an occupant of a building (e.g. a resident) who is able to see construction activity (visual effects), hear/feel construction traffic (noise and vibration effects) and is less able to travel to nearby facilities due to high levels of construction traffic (severance effects). Although some of the contributing effects will have been determined using quantitative information (noise and vibration and severance) others are qualitative and therefore subjective (visual). Combining these effects can never therefore be undertaken quantitatively and can only ever be determined using professional judgement. It is not the case that two minor effects always combine to give a moderate effect, or that a moderate effect combined with a minor effect is necessarily major.

The professional judgement required is a combination of judgements from specialists in different disciplines (in this instance landscape architects, acousticians, and transport planners) together with the EIA lead who is preparing the intra-project cumulative assessment. The assessment is also limited by the granularity of the receptors assessed in the individual assessments. For example, viewpoint assessments do not

exist for every property that may be able to see construction activity. The assessment uses the nearest representative viewpoint (on publicly accessible land) as a proxy for what may be experienced at individual residential properties. Intra-project cumulative assessment is only intended to give an indication as to the potential for significant effects, but not to assess each individual receptor, be it a house, school or other facility.

The Applicant has reviewed some recently made DCOs to see how intra-project cumulative effects were assessed, and whether any criteria have been developed that may help in the differentiation between moderate and major significant intra-project cumulative effects. The results of this review are set out in Appendix A to this document. It is clear from these few examples that there are differences in approach and where projects are providing levels of significance, there is typically very little information to substantiate the conclusions reached.

The intra-project cumulative effects of the Proposed Project starts by reporting the contributing significances of individual effects, which in each instance, involve one or two minor effects (noise, severance or health and wellbeing) combining with an effect that is minor, moderate or major (visual). Where only two minor effects combine, it seems reasonable to assume that the resulting effect would either remain minor or else become moderate at most. Where a minor effect combines with a major effect it seems reasonable to conclude that the cumulative effect would be major, given this is the highest level of effect on the scale of reporting. However, where one or two minor effects combine with a moderate effect, it is not possible to calculate in any meaningful way whether the resulting combined effect would be moderate or major.

In summary, and for the reasons set out more fully above, the Applicant considers that the Secretary of State can reach a reasoned conclusion in the absence of reporting the level of significance for intra-project cumulative effects, given that:

		• There are many examples of DCO projects that have not differentiated between moderate and major intra-project/combined effects, but which have been successfully determined by the Secretary of State. • The only differentiation the EIA Regulations require is between significant and non-significant effects. The Applicant will, however, give further consideration to ways in which these effects may be further explained or quantified in order to provide additional clarity.	
AP10	Technical note regarding protection of under keel clearance including in relation to cable crossings on bedrock where external protection or backfilling will be required above seabed level.	A technical note will be supplied at Deadline 1A which will provide a detailed response to the protection of under keel clearance across the three areas of interest identified by PLA London Gateway and HHA: (a) “Sunk Pilot Boarding area”, (b) “Long Sand Head Two-Way Route crossing” and (c) North East Spit area". This will include an explanation of how the Applicant’s proposed marine works (Work No.6) would not impede the dredging of those parts of the areas of interest to the following depths: (a) “Sunk Pilot Boarding area” to a level of 22 metres below Chart Datum (CD); (b) “Long Sand Head Two-Way Route crossing” to a level of 12.5 metres below CD and; (c) North East Spit area" to a level of 12.5 metres below CD. Recent discussions with PLA and HHA have also set the requirement for an additional allowance for an 'over-dredge' tolerance of 0.5 metres beyond the specified depths. The technical note will also detail any expected reductions in water depth greater than 5% at proposed crossings and explain how under keel clearance will be maintained in the three areas of interest. The Applicant is actively consulting with all relevant stakeholders to ensure a common understanding of their specific requirements, including geographic areas and the recent requirement for over-dredge tolerances. Technical assessments are ongoing to facilitate final agreement and the wording of the proposed protective provisions.	Deadline 1

		The primary methodology for protecting the cable and for installing the works (Work No.6) at a level which would not impede future dredging and would safeguard under keel clearance, is by lowering the cable below seabed to the proposed target depth of lowering. The Target Depth of Lowering (TDOL) along the Offshore Scheme is described in AS-018 Table 4.15. The minimum depth of lowering (DOL) to the top of the cable is 0.5 m in areas of weak bedrock Chalk, with a target DOL for the Proposed Project approximately 1 m to 2.5 m. In sections of the route identified as having the highest risk of cable strike due to marine traffic, a TDOL between 2.0 m to 2.5 m is proposed. The trench along these sections – specifically KP 38 to KP 58, and KP 81.5 to KP 96.5 – is proposed to be backfilled using rock to a level below the original seabed level. Table 4.18 and 4.19 of AS-018 lists the developments also likely to cross the Offshore Scheme. Crossings of cables would be undertaken using agreed crossing designs in accordance with the crossing agreements with the third-party owners and would consider the requirements to safeguard under keel clearance. The proposed crossing locations within the three areas of interest, including in areas of bedrock (stiff clay or chalk) provide sufficient water depth to safeguard under keel clearance. The exception is the currently proposed Grid Link crossing location, where the agreed mitigation is to cross further east in deeper water within the order limits.	
AP12	Ports such as Medway, Tilbury and London Gateway Port do not appear to have been consulted on the Navigational Risk Assessment [APP-203]. Provide an explanation as to how the necessary additional consultation will be carried out.	The ports of Medway, Tilbury and London Gateway Port were assessed as being outside the **Navigational Risk Assessment [APP-203]** 10 Nautical Mile shipping and navigation study area and therefore were not included in the consultation sessions undertaken for the NRA. The Applicant has since received Relevant Representations from Port of London Authority stating that the Port of Tilbury and London Gateway Port should be consulted, and from the Maritime and	Deadline 1

		Coastguard Agency (MCA) stating that Medway Port should be consulted with on the Navigation and Installation Plan (NIP). The Applicant has therefore contacted the Port of Medway, Port of Tilbury and London Gateway Port via email. The Applicant has received a Relevant Representation and are in the process of arranging a meeting with the Port of Tilbury, currently planned for the 24 November 2025. The Applicant had a meeting with the London Gateway Port on the 17 November 2025, and the Applicant is in discussions via email with the Port of Medway (Peel Ports), with the possibility of arranging a meeting as required.	
AP13	Consideration as to whether there are adequate controls in the draft Development Consent Order/Deemed Marine Licence with regard to under keel clearance during construction and future requirements.	The Applicant has submitted draft DCO and Deemed Marine Licence (DML) documents, with further updates to be incorporated, as details are agreed with the various stakeholders. A first draft of the proposed wording for the Protective Provisions within the DCO has been provided to the PLA. The Applicant is currently reviewing the feedback and comments received from the PLA. Further discussions are ongoing with other relevant stakeholders including HHA and London Gateway. The Applicant is actively working to ensure a common understanding of the various stakeholders' specific requirements pertaining to the safeguard of water depth / under keel clearance as well as their requirements to consult on the proposed works (Work No.6) including survey, monitoring and preconstruction/construction activities. Once the Protective Provisions are finalised, subject to any necessary amendments, agreement will be reached on how to secure them within the DCO to the satisfaction of the stakeholders. The DML and Protective Provisions (or other agreed means of securing the requirements) will be provided alongside the draft management plans, such as the Navigation Installation Plan (NIP), and outline Cable Specification and Installation Plan (CSIP).Together, these are intended to provide stakeholders with the necessary assurance that the interests of	Deadline 1

		shipping and navigation stakeholders will be protected both now and in the future.	
AP14	Response to London Gateway Port's questions about provision of draft cable laying and burial plan, cable protection plan and the cable specification installation plan.	The Applicant has submitted a draft DML which describes the provision of pre-construction plans and documentation including (but not limited to) the cable laying and burial plan, cable protection plan and cable specification and installation plan. The details of these plans will be provided in a single document known as the Cable Specification and Installation Plan (CSIP). The CSIP will be submitted pre-construction in accordance with the DML and will be informed by the Contractor's final assessment of the site data, burial assessment study and detailed design and methodologies. The Contractor's detailed design is still to be undertaken and therefore the final design and methodologies to inform the final CSIP is not currently known. An outline version of the CSIP will be submitted into the DCO process at an agreed deadline. The Applicant is in discussions with London Gateway and other relevant stakeholders on the scope of the CSIP to be submitted pre-construction. Discussions are ongoing to understand whether any further additional documents are required or whether the scope of information required can be captured in the documents proposed in the draft DML.	Deadline 1
AP15	Addendum to provide additional detailed cumulative traffic assessment for Kent and Suffolk. Focusing particularly on construction phase traffic.	Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) has been prepared as discussed previously with Suffolk County Council, and as mentioned by the Applicant during Agenda Item 5.3 of ISH1 (which covered 'Cumulative traffic impacts, including construction traffic in combination with other projects and how this has been assessed by the Applicant').	Deadline 1
AP17	Provision of the worst case noise assessment for works in the intertidal area in Pegwell Bay including further	The Applicant is submitting the following documents at Deadline 1 **Application Document 9.13 Pegwell Bay**	Deadline 1

	justification for the assumed plant and equipment. This should clearly address the cumulative effects of short term activities such as vehicle movements, as well as 24 hour working effects from lighting and noise on the use of the intertidal area. The implications for Environmental Impact and Habitats Regulations Assessments should be set out.	**Construction Method Technical Note** and **Application Document 9.49 Seals and Airborne Noise Modelling**. **Application Document 9.13 Pegwell Bay Construction Method Technical Note** has been prepared in response to relevant representations received from several stakeholders seeking clarification on the works and activities that are proposed for the Kent landfall in Pegwell Bay. This includes information on the types of construction plant and equipment that will be required during the different phases of landfall construction and marine cable installation. **Application Document 9.13 Pegwell Bay Construction Method Technical Note** focuses specifically on activities and works within the intertidal zone (between Mean High Water Spring (MHWS) and Mean Low Water Spring (MLWS)). In response to a Relevant Representation from Natural England seeking clarity on the approach taken to the modelling of airborne noise impacts on seals at the River Stour haul out site, the Applicant has prepared **Application Document 9.49 Seals and Airborne Noise Modelling**. This document is based on information provided in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-094]** and **Application Document 9.13 Pegwell Bay Construction Method Technical Note** and provides information on the modelled worst-case scenario for impacts on seals (in accordance with Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope (GOV.UK 2025)). This includes the identification of the construction plant and equipment that has potential to generate the highest levels of noise and/or construction plant and equipment that has potential to generate highest levels of disturbance based on distance of the proposed landfall activities and mobilisation of equipment from the seal haul out (maximum design scenario (MDS).

The MDS was identified through detailed discussions with engineers, noise specialists and marine ecologists. Sound source levels for equipment in **Application Document 9.13 Pegwell Bay Construction Method Technical Note** were identified from a range of sources including recognised British Standards (adapted from WHO (1999), BS 8233:2014 (British Standards Institution, 2014), & ProPG Planning and Noise (Association of Noise Consultants, Institute of Acoustics, & Chartered Institute of Environmental Health, 2017). However, it is noted that for certain specialist equipment, sound source levels will be dependent on contractor equipment and construction design specifications.

For impacts to seals in the River Stour M-weighted (i.e. specifically weighted for seal hearing sensitivity) acoustic modelling has been undertaken to assess construction-related noise impacts on seals. This has applied standard thresholds for auditory effects (temporary threshold shift and permanent threshold shift (TTS and PTS) outlined in Southall et al. (2019)). A refined acoustic modelling approach, using a 3D computer model was constructed using Datakustik CadnaA (version 2025) (Datakustik, 2025), which incorporates the prediction methodology for the propagation of sound set out in ISO 9613-2:2024 (International Organization for Standardization, 2024).

To determine disturbance in seals the modelling has also used topographical information of the local environment to determine sound levels from the MDS project activities at their haul-out location. There are no thresholds for identifying disturbance in seals. However, a robust science-based approach to determining disturbance has been adopted, utilising audiogram data and known hearing sensitivity of seals, local conditions and habituation, and guidance on noise design criteria for humans (which have higher hearing sensitivity than seals).

Conclusions presented in **Application Document 9.49 Seals and Airborne Noise Modelling** have been included

		Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals. The Applicant can confirm that the results from the updated airborne noise modelling do not change any of the conclusion of effect significance presented in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077]** which concluded that impacts from airborne noise on seals at the River Stour haul out would not be significant. **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** is also being updated to include outputs of the airborne noise modelling that are specific to marine ornithology, in particular species that are known to be present at Pegwell Bay. This updated ES chapter **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology** will be submitted at Deadline 1A. Consideration of any implications from the updated noise modelling for the Habitats Regulations Assessment (HRA) will also be submitted at Deadline 2.	
AP21	Explain the rationale behind which elements of the proposed development are includxed within the work numbers. Include an explanation of why works proposed such as ecological mitigation, landscaping, drainage and works to public rights of way do not have specific works numbers.	The Works Plans submitted with the application for the Sea Link project are part of a wider suite of plans, with the Works Plans showing the areas for the numbered principal works as listed in Schedule 1(1) of the draft Development Consent Order (DCO) (document 3.1, updated for Deadline 1). Ecological mitigation, landscaping, drainage and public rights of way works are not principal works listed in Schedule 1(1) of the draft DCO nor is it necessary for them to be. Outline locations for these works are provided in the management plans and associated documents, and it is these documents and documents such as the Statement of Reasons (document 4.2, updated for deadline 1) that provide the justification of land acquisition where land is 'white' in the Works Plans. This position was articulated in the Applicant's letters dated 1 September **[AS-084]** and 16 September **[PD-008]**. It should be noted that the majority of detail on these ancillary aspects of the project is typically developed only in outline at	Deadline 1

the application stage, with flexibility retained necessarily for plans to evolve and be finalised post consent.

Article 3 in the draft DCO states under (4) that:

'The authorised project must be constructed and installed in the lines and situations shown on the Works Plans subject to article 5 (limits of deviation)…'

This means that unlike detail presented on landscaping in the **Outline Landscape and Ecological Management Plan [AS-059]** and **[PDA-035]** and **Public Rights of Way diversions in the Outline Public Rights of Way Management Plans [APP-352 and APP-353]**, detail on the Works Plans is fixed and great care must be taken if including this detail on the Works Plans to ensure that flexibility is not unnecessarily restricted. Unnecessarily restricting the flexibility of major infrastructure projects can affect cost and programme for delivery; but can also perversely make it more difficult for applicants to respond to environmental and technical challenges experienced following consent; and restrict the ability of the applicant to innovate to create better projects. This can mean worse outcomes from communities and the environment.

The way in which applicants decide to present information across plans, particularly in the Works Plans, varies and there are pros and cons of different approaches taken. In case it is helpful, the Applicant has provided a review of different approaches taken in applications consented in 2024 and 2025 to illustrate the range of approaches and provide reassurance that the principle of the approach taken in the original application was both acceptable and appropriate.

In should also be noted that in July 2024 the Applicant shared draft Works Plans for Sea Link with the Planning Inspectorate. Comments were received on 2 September 2024 and no concerns were raised over the approach taken. These draft Works Plans were very similar to those submitted with the

		application, with no works numbers for activities such as ecological mitigation and significant 'white areas' (see below). Notwithstanding all the above, the Examining Authority has consistently indicated that they would prefer National Grid to take a different approach to the Works Plans to more closely follow that taken by Scottish Power Renewables and include detail in the works plans for activities such as environmental mitigation. The Applicant has therefore added five additional numbered works (albeit the actual activities are not new – they have just been given a number) to the draft DCO Schedule 1 (1), namely: • Work No. 13 Principal Drainage Works • Work No. 14 Principal Accesses • Work No. 15 Principal Environmental Mitigation and Landscaping • Work No. 16 Principal Utility Diversions • Work No. 17 Principal Public Rights of Way Diversions The Applicant has also provided Revision B work plans at Deadline 1 that show the extent of these newly numbered works. Showing these works with their own individual works number creates plans with numerous overlapping layers that can be difficult to read. Therefore, to provide clarity on the plans, whilst each of the additional elements has its own work number, on the Revision B works plans some hatching covers more than one work, with this explained in the key.	
AP22	There are several areas across the order limits where there are large areas of 'white' land on the work plans. In these areas it is unclear the extent of any works that are happening or the arrangement of any works within that particular area. It is important for the ExA to fulfil its duties with regards to compulsory acquisition	The Applicant's letters of 1 September **[AS-084]** and 16 September **[AS-106]** provide reassurance that all land required within the Order limits is required for the Sea Link project and guided the Examining Authority to documents explaining the reasons for both the land and land powers required. As described in the answer to AP21 above and illustrated in Appendix B to this document, approaches to works plans vary and it is not necessary for all the evidence and explanation for	Deadline 1

	that it is clear why the full extent of all land is required. Revise the works plans to provide clarity on the full extent of all works proposed.	the use of land to justify compulsory acquisition to be provided in the Works Plans. The case for compulsory acquisition is derived from many submission documents, and is drawn together by the Statement of Reasons. However, the Applicant acknowledges the complexity of the interaction between the project and the SPR DCOs at Friston, compounded by the different approach to the Works Plans. The Applicant also acknowledges that cross referencing across numerous plans can make it more difficult to understand the proposed activities within areas that were formerly white in the Works Plans. Therefore, the Applicant has provided Revision B work plans that include hatches for the five new works described above and consequently removed white areas from the Works Plans. The Applicant has also updated the Statement of Reasons and Draft DCO to reflect these changes and make it clearer what the reason is for inclusion of all areas of land within the Order limits.

Appendix A Review of Approaches to Reporting Significant Intra-Project Effects

Appendix Table A.1 Review of approaches to reporting significant Intra-Project Effects

DCO Project	Levels of Significance Provided?	Approach	Link to Document
Byers Gill Solar EN010139 Decided in July 2025	No	The combined effect is detailed as either likely or unlikely/ unexpected to result in a significant effect; no level of significance is provided.	EN010139-000276-6.4.13.1 Environmental Statement Appendix 13.1 In-Combination Effects Table.pdf
London Luton Airport Expansion Development Decided in April 2025	Yes	The methodology sets out how the combined significance is to be arrived at, which is based upon a narrative description of the change in magnitude; however, the results reported are considered to lack justification. The assessment states that there would be moderate adverse visual effects during construction for users of Eaton Green Road, Winch Hill Road, Kimpton Road, Airport Way and New Airport Way, and that these same road users would experience minor traffic related effects. The narrative description of changes to magnitude concludes that because the effects are temporary and localised, the overall cumulative effects are minor. However, the temporary and localised nature and of these effects will have	nsip-documents.planninginspectorate.gov.uk/published-documents/TR020001-000939-5.01-Environmental-Statement-Chapter-21-In-combination-and-Cumulative-Effects-Revision-1.pdf

		already been considered when assessing the individual effects and therefore in this assessment the moderate and minor effects are never truly combined. Reporting this combined effect as a 'third effect', separate from the individual effects is also problematic given the overall effect is reported to be of lower significance than one of the contributing effects (the moderate visual effect). Similarly, the assessment states that "*Moderate/major adverse, significant traffic noise effects predicted to be experienced in Tea Green are likely to occur concurrently with minor adverse, not significant visual amenity effects. These have the potential to lead to a medium magnitude of change and therefore a moderate adverse, significant in-combination effect.*" It is not clear how this magnitude has been arrived at other than the two effects would be happening at the same time. There is again no explanation as to why the cumulative effect is moderate, when one of the contributing effects (traffic noise) is considered to be moderate/major on its own. If examples where the combined effect is considered to be a third, separate effect, it is not clear how this would help the decision maker, as the effects have not actually been combined. The above is stated not to suggest that the assessment is entirely flawed, but just to demonstrate the challenges presented by intra project effects assessment and why providing gradations of significance is difficult to justify.	
Cory Decarbonisation Project Decided in November 2025	Yes	Although a level of significance is reported, the methodology provides no information at all about how the combined significance level is arrived at. It may be the case that the combined significance level was taken from the highest significance (moderate adverse) level that was presented in the single topic assessment, as it appears to be the same in each instance.	Environmental Statement: 6.1 Chapter 21: Cumulative Effects

		However, if this is the case it is not clear how this would be helpful to the decision maker.	
Sizewell C Project Decided in July 2022	No	The combined assessment does not detail a level of significance. Instead, it simply states whether or not there is a potential for a significant combined effect.	EN010012-002579-SZC_Bk6_6.11_ES_V10_Ch2_Inter-relationship_Effects_Appx2A_2B.pdf
HyNet CCS Pipeline Decided in March 2024	Yes	Although no significant effects were reported in the intra-project effects assessment, the non-significant effects were given a level of significance (e.g. minor or negligible). However, the methodology (as outlined in Step C of the appendix) does not detail how the levels were derived. For example, moderate adverse significant effects for Landscape, when combined with a minor / moderate significant effects for Population and Human Health, are reported to have a combined minor adverse non-significant effect. As with Luton Airport, this approach appears to have derived a separate effect of lower significance than the two contributing effects when considered separately.	Environmental Statement (Volume III)
A66 Northern Trans-Pennine Project Decided in March 2024	No	No levels of significance are reported for intra-project effects. The assessment only provides a likelihood / potential for combined effects and does not even conclude whether intra-project effects are likely to be significant or not.	TR010062-000480-3.4 Environmental Statement Appendix 15.3 In-Combination Effects Table.pdf

Appendix B Table of approaches to Works Plans in Recently Consented DCO applications

The table below provides some examples of the approaches taken to Works Plans and Work numbers in recently consented DCO applications. This provides a snapshot to illustrate the range of approaches taken. All the below approaches to Works Plans were determined sufficient, appropriate and acceptable for the projects concerned. All projects were consented and compulsory acquisition powers granted where required.

Appendix Table B.1 Table of approaches to Works Plans in Recently Consented DCO applications

Application	Project Type	Consented	Approach to Works Plans
Bramford to Twinstead Reinforcement	Electricity transmission	September 2024	Same approach as Sea Link application submission. No numbered works for PRoW diversions, ecological mitigation etc. Works Plans contain 'white land' and focus on principal works.
Yorkshire Green	Electricity transmission	June 2024	Same approach as Sea Link application submission. No numbered works for PRoW diversions, ecological mitigation etc. Numbered works are included for some works to other utilities (e.g. distribution network assets). Works plans contain 'white land' and focus on principal works.
Luton airport	Airport	April 2025	Ten pages of works numbers and descriptions with each parcel, Works Plans showed environmental mitigation areas but tended to wrap drainage into each numbered work and did not show PRoW as a separate numbered work. Work numbers of individual habitat creation areas, open space etc.
Tillbridge Solar Project	Solar	October 2025	Works numbers for elements such as habitat management and protection (work No. 9) and a catch-all Work 6 that included a range of activities, from electrical cables and permissive paths to drainage. Work 6 is similar to the works described in Schedule 1 (2) for Sea Link. The Works Plans showed Work 9 across all areas not covered by solar development in the main site;

			and Work 6 similarly hatched across a good proportion of the solar site rather than specific areas.
Gate Burton Energy Park	Solar	July 2024	No individual works for drainage or PRoW works or landscaping. Inclusion of a 'Work 9' for habitat management and protection with specific areas shown on the Works Plans. Additional catch-all work 5 that included landscaping, fencing, electrical cables, earthworks, accesses, drainage etc. that is hatched over all of the main solar site; in some areas this is the only work on an area of the plans. Work 5 is similar in nature to those described in Schedule 1 (2) for Sea Link.
A46 Newark Bypass	Highways	October 2025	Very detailed works plans with General Arrangement superimposed on the plan and a large number of works shown. Works described for an area described all parts of that work; which may include works to drainage and environmental mitigation.
Immingham Green Energy Terminal	Port	February 2025	Nine works numbers, none of which are for ecological mitigation, landscaping, utility diversions, drainage or PRoW diversions; although some of the works mention utilities and drainage. These mechanisms are principally captured under a catch all 'further associated development' section of Schedule 1, as they were for Sea Link.

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