



**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

**Document 9.70: Applicant's Written Summary of Oral Submissions to  
Issue Specific Hearing 1**

**Planning Inspectorate Reference: EN20026**

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**nationalgrid**

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# 1. About This Document

## 1.1 Introduction

- 1.1.1 This document summarises the oral submissions made by National Grid Electricity Transmission plc (the Applicant) at Issue Specific Hearing 1: Scope of the Development held on Tuesday 11 November 2025, at Discovery Park Visitor Centre, Innovation House, Sandwich, Kent CT13 9FF, in relation to the Sea Link Project (the Project).
- 1.1.2 The hearing commenced at 10:00 am and concluded at 1:06 pm.
- 1.1.3 The summary of oral submissions provided in this document follows the structure and order of the agenda items set out by the Examining Authority (ExA) in the **Agenda for issue specific hearing 1 dealing with the scope of the development [EV3-001]**.

## 1.2 Attendees on Behalf of the Applicant

- 1.2.1 Saira Sheikh KC appeared on behalf of National Grid Electricity Transmission plc, the Applicant.
- 1.2.2 The following representatives were also in attendance:
  - Hugh Flanagan (Barrister)
  - Seb Stevens (Consents)
  - Ali Leeder (Consents)
  - James Buckley (Onshore Engineering)
  - Nigel Pilkington (EIA)
  - Natalie Hirst (Marine Consents)
  - Jeremy Douch (Traffic)
  - Chris Burlton (Traffic)
  - Mark Anderson (Shipping and Navigation)
  - James Riley (Ecology)
  - Neal Gates (Ecology)
  - Adam Lawrence (Noise and Vibration)
  - Sarah Edwards (Marine EIA)
  - Andrew Holmwood (Marine Engineering)
  - Tim Riggall (HDD)

## 2. Applicant's Summary of Case on Item 2: Matters arising from the supplementary agenda

### 2.1 Issues Addressed

Table 2.1: Agenda item 2: Matters arising from the supplementary agenda

Item Discussed	Summary of Oral Case
Matters arising from the supplementary agenda	
Responses to supplementary agenda questions to be submitted at Deadline 1A (Tuesday 26 November 2025) unless otherwise specified.	As requested by the ExA the Applicant has responded to these supplementary questions in writing in <b>Application Document 9.37 Applicant’s Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 1.</b>
The ExA invited Interested Parties to raise matters for further questioning with the ExA during the hearing in Item 2 of the agenda.	The Applicant noted points raised by the Environment Agency regarding European eel, and Save Minster Marshes regarding consultation on changes for the hoverport.



### 3. Applicant's Summary of Case on Item 3: Need

Table 3.1: Agenda item 3: Need

Item Discussed	Summary of Oral Case
Need	
The applicant to summarise the need case for the Proposed Project including reference to the National Energy System Operator (NESO) and the NESO Clean Power 2030 report.	The applicant provided an oral response to the points raised around the project need case. That oral evidence is not repeated here because, at the request of the ExA, the Applicant has provided a comprehensive written response to these questions, building on the oral evidence given at ISH1, setting out the needs case for the Proposed Project and addressing the matters raised by Interested Parties.
The need for the proposed development when considering other proposed and consented schemes.	Please see Action Point 1 (AP1) in <b>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b> .
The need of the proposed development if an alternative, such as an offshore grid, was utilised.	

## 4. Applicant's Summary of Case on Item 4: Update on related projects

**Table 4.1: Agenda item 4: Update on related projects**

Item Discussed	Summary of Oral Case
<b>Update on related projects</b>	
East Suffolk Council (ESC) updates regarding applications to discharge requirements in relation to the Scottish Power Renewables (SPR) National Grid substation.	<p>The Applicant acknowledged the updates provided by ESC and SPR in respect of the discharge of conditions on Kiln Lane (Friston) substation.</p> <p>The Applicant has provided detailed comments on this matter in response to Action Point 4. See <b>Document 9.72.2: Applicant's Response to Issue Specific 1 (ISH1) Action Points – Deadline 1A</b></p> <p>The Applicant noted Suffolk County Council's (SCC) comments regarding ESC not solely being the relevant discharge authority for SPR's conditions, with respect to Archaeology and SCC's role as the Local Highway Authority and Lead Local Flood Authority.</p> <p>The Applicant notes the concerns raised by Friston Parish Council and Substation Action Save East Suffolk (SASES) regarding the potential for the Proposed Project to adversely impact upon SPR's discharge of requirements relating to mitigation.</p>
The need for Friston substation scenario 2 to be included in the DCO.	<p>The Applicant provided an oral response to this point. However, further to the discussion at ISH1, the Applicant provided a detailed written update at Deadline 1 addressing the issue of the inclusion of scenario 2 in the examination. See <b>Application Document 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1</b>. As such the complete oral evidence is not reproduced here.</p>
The National Grid Ventures (NGV) LionLink project, consultation and publication of the Preliminary Environment Impact Report (PEIR).	<p>The Applicant provided an update as to its understanding from NGV as to when the LionLink Preliminary Environmental Impact Report (PEIR) is currently expected to be provided and when further detail of the converter station will be available for further consideration of potential cumulative visual effects in <b>9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b>.</p>

Item Discussed	Summary of Oral Case
	The Applicant acknowledged comments from SEAS.



# 5. Applicant's Summary of Case on Item 5: Cumulative impacts

Table 5.1: Agenda item 5: Cumulative impacts

Item Discussed	Summary of Oral Case
Agenda Item 5: Cumulative impacts	
<p>The approach to assessment and mitigation of intra-project cumulative effects. Specifically, the ExA queried why significant intra project cumulative effects were not identified as moderate or major, but simply significant. In the absence of this information, and any additional mitigation proposals, the ExA queried how the Secretary of State should weigh these effects in their determination.</p>	<p>The Applicant outlined that for intra-project cumulative effects, otherwise referred to as combined effects, it is not usually the case that gradations of significance are identified.</p> <p>The Applicant explained that, due to their nature, in most instances the effects considered cannot therefore be added together in a quantifiable way – for example traffic and transport, noise and health and wellbeing effects, for example, combining with visual effects. This means it is not appropriate to try to identify a resulting level of significance but rather to conclude that there could be a significant cumulative effect. The applicant confirmed that the Infrastructure Planning (EIA) Regulations do not require that a difference be drawn between moderate and major effects, just that likely significant effects are identified.</p> <p>This is addressed in the Applicant’s response to action 8 in <b>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b>.</p> <p>The Applicant explained that in terms of mitigation, where an individual effect is reported to have a residual significant effect, that effect will have already been mitigated as far as reasonably practicable, as the Applicant has sought to mitigate all significant effects as far as reasonably practicable.</p> <p>There may be ways in which the contributing minor effects can be further mitigated, although this would likely require more detail from the appointed Main Works Contractor. It is for this reason that no additional measures have been identified at this stage. The applicant provided examples of mitigation measures, such as community liaison, which it is believed may help address these cumulative effects during construction. Whilst the measures identified at present are reactive, the Applicant is keen to work with communities to</p>

Item Discussed	Summary of Oral Case
	<p>reduce these cumulative effects through the construction process.</p> <p>The Applicant also highlighted the commitment to having a Transport Coordinator, and that similar coordinators had been appointed for Sizewell C and SPR and are working together to address cumulative traffic. The Applicant confirmed it plans to take a similar approach.</p>
<p>Shipping and navigation in the Sunk and the implications of cable burial depth for under-keel clearance.</p>	<p>The Applicant explained that in the Sunk region, the primary means of cable protection is by lowering the cable beneath the seabed, therefore the Applicant does not anticipate any rock protection above seabed level. Where application documents refer to rock backfill, this refers to rock backfill within the cable trenches. In certain high-risk, heavily trafficked areas, rock backfill will be placed within the cable trench to 80% of the height of the trench, therefore below seabed level. In locations where the cable is crossing other assets (where the Applicant is the crossing party) there may be a requirement to install a rock protection berm structure above seabed level.</p> <p>For further information see document <b>Application Document 9.74.2 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note</b>.</p>
<p>Cumulative traffic impacts, including construction traffic in combination with other projects and how this has been assessed by the applicant</p>	<p>The cumulative Traffic and Transport impacts have been assessed and the effects are concluded to be not significant.</p> <p>Having reviewed the construction programmes of the cumulative schemes, the Applicant currently believes that peak activity is considered highly unlikely to overlap. The Applicant stated that it is in each developer's interest in terms of programme and efficient working to avoid any overlaps of peak construction traffic. Co-ordination between projects is on-going and will continue up to and through construction in order to manage efficient project delivery.</p> <p>However, to allow for the unlikely case where programmes change and peak activity did overlap, a worst-case scenario sensitivity test has been undertaken, looking at what cumulative Traffic and Transport effects may arise. Any possible overlap that was assessed to result in an effect above negligible, will only ever be short term, and it is this short duration that means there would not be a significant cumulative effect. The Applicant confirmed that a Supplementary Technical Note would be provided at Deadline 1</p>

Item Discussed	Summary of Oral Case
	<p>providing further details about the the assessment methodology and findings of the cumulative Traffic and Transport effects with other projects in Suffolk [See document <b>9.26 Traffic &amp; Transport Cumulative Assessment (Suffolk) [REP1-110]</b>].</p> <p>The Applicant acknowledged SCC's comments on the assessment and highlighted the extensive scoping exercise that the Applicant had undertaken with the Local Highways Authority.</p>

## 6. Applicant's Summary of Case on Item 6: Trenchless landfalls

**Table 6.1: Agenda item 6: Trenchless landfalls**

Item Discussed	Summary of Oral Case
<b>Trenchless landfalls</b>	
The National Grid Ventures (NGV) Nemo Link project	<p>The Applicant reiterated the organisational separation between NGV and National Grid Electricity Transmission. The Applicant noted its understanding that the methodology for Nemo Link reflected the needs of that project, at that time.</p> <p>The Applicant has provided a further written response in response to Action Point 16 which is provided in document <b>9.72.2 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A.</b></p>
Nemo Link project including] reasons for use of open cut and its implication for a trenchless solution for Sea Link.	<p>From a consenting perspective, for Sea Link, the Applicant confirmed they had not applied for an open cut solution (and it forms no part of what is before the ExA pursuant to this application) and the Applicant is confident that a trenchless approach beneath the sensitive saltmarsh is deliverable.</p> <p>This is based on a good understanding of the ground conditions, having identified risks at the early stage and undertaken thorough ground investigations and geophysical surveys along the route to make sure that the Horizontal Directional Drill (HDD) is a success.</p> <p>A further written response is provided in response to Action Point 16 document <b>9.72.2 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A.</b></p>
Noise assessment assumptions for ecological assessments and certainty of mitigation for habitats regulations assessment.	<p>The Applicant confirmed that separate assessments were undertaken to determine noise impacts on different ecological receptors. Each assessment assumed a worst case, selecting appropriate plant and equipment and following appropriate noise propagation rules. The worst-case impacts are assessed against guidance to determine the level of impact. The assessments conclude that with best practicable means in place, the results are not significant.</p>

Item Discussed	Summary of Oral Case
	<p>The questions raised by the ExA have been dealt with in detail in Action Points AP17 and AP18—documents <b>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b> and <b>9.72.2 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A</b>.</p>
<p>Basis for Horizontal Directional Drilling (HDD) compound plant and noise assumptions.</p>	<p>The Applicant stated that indicative site layouts were used to model noise at HDD sites. The plant and equipment list for the inter-tidal area includes piling equipment (used during set-up) and drilling fluid recycling and mud pumps (used during operation).</p> <p>The worst-case assessment used noise source data for the equipment expected to generate the highest impacts, which is piling noise during the set-up phase. The data is based on British Standards or representative data from other sources and is considered robust.</p> <p>The worst-case scenario assessment of noise from works in the intertidal areas is addressed in further detail in Action Point 17 (AP17) in <b>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b>.</p>
<p>Extent of further works within the footprint of designated sites (e.g. ground investigations) and whether their impact is fully addressed within the application.</p>	<p>The Applicant confirmed that the DCO application has assessed all pre-lay seabed survey activities to confirm the seabed conditions. Requirements to complete pre-construction surveys have been identified in the DCO <b>Application Document APP045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>.</p> <p>UXO surveys and clearance works have not been included in the DCO assessment. It is standard practice for these UXO works to be subject to separate marine licences. This approach is described in <b>Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077]</b>.</p> <p>Additional Pegwell Bay ground investigation surveys e.g. boreholes or other intrusive sampling (such as cone penetration testing) are needed in the intertidal area east of saltmarsh due to a lack of intrusive ground investigation information around the exit area. There was only one Nemo borehole in the vicinity of the exit, so testing is needed to further understand groundwater pressures in the underlying chalk and confirm the position of the top of the chalk that has been identified by geophysical methods. This would involve likely 3 – 4</p>

Item Discussed	Summary of Oral Case
	<p>intrusive investigations (boreholes or Cone Penetration Tests (CPTs)) that would most likely be accessed terrestrially.</p> <p>The duration for ground investigation boreholes is typically 2 days, so a total of 8 days might be the duration for active drilling work in the intertidal area. The CPT method would require less time, potentially one to two tidal cycles.</p> <p>The Applicant notes that a further written response is provided in response to Action Point 19 document <b>9.72.2 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A</b>].</p>



# 7. Applicant's Summary of Case on Item 7: Reporting of significance

Table 7.1: Agenda item 7: Reporting of significance

Item Discussed	Summary of Oral Case
Anda Item 7: Reporting of significance	
Overlap of construction and operational effects in the reporting of biodiversity and ecology effects in the assessment summary tables and the potential for double counting of effects.	In the interest of time, the ExA turned this item into a written question in the form of Action Point 20 of the <b>Action Points arising from Issue Specific Hearing 1 (ISH1) on the scope of the development held on Tuesday 11 November 2025 [EV3-007]</b> . The Applicant has responded to this Action Point at Deadline 1A in <b>9.72.2 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A</b> .

# 8. Applicant's Summary of Case on Item 8: Work numbers and work plans

Table 8.1: Agenda item 8: Work numbers and work plans

Item Discussed	Summary of Oral Case
Work numbers and work plans	
Detail provided in the description of work numbers and the visual representation of such works within the relevant works plans.	<p>The Applicant agreed to provide new versions of the work plans to assist the Examining Authority, and the interested parties understand the proposed uses of land.</p> <p>It was acknowledged that comparing lots of sets of plans and bringing all the information together is proving challenging; hence the Applicant agreed to the request of the ExA to provide an updated version of the works plans.</p> <p>In the interest of time, the ExA turned the remaining matters of this item into a written question in the form of Action Points 21 and 22 of the <b>Action Points arising from Issue Specific Hearing 1 (ISH1) on the scope of the development held on Tuesday 11 November 2025 [EV3-007]</b>. The Applicant has responded to this Action Point at Deadline 1 in <b>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1 [REP1-124]</b>.</p>

# 9. Applicant's Summary of Case on Item 9: Any other business

Table 9.1: Agenda item 9: Any other business

Item Discussed	Summary of Oral Case
Any other business	
London Gateway Port raised a question regarding the cable specification installation plan (CSIP) and when the Applicant will be producing this? If so, when might this be expected. ed?	The Applicant confirmed that a date would be provided. A deadline was not specified; however, it is the Applicant’s intention to submit an outline version of the CSIP, subject to discussions progressing with relevant parties.

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