



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

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1. Introduction

1.1 Overview

- 1.1.1 On 27 March 2025 National Grid submitted an application to the Secretary of State for Energy Security and Net Zero (the Application) for a Development Consent Order to authorise the construction and operation of the proposed reinforcement of a transmission network in South East and East Anglia, known as the Sea Link Project (the Proposed Project). The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.1.2 The Application for the Proposed Project was accepted for Examination by the Planning Inspectorate on 23 April 2025 and has been allocated the reference number EN020026. The Examination into the Proposed Project commenced on 5 November 2025 and is due to close on 5 May 2026.

1.2 The Project

- 1.2.1 National Grid is seeking consent to reinforce the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston (Kiln Lane) Substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent. This reinforcement would be approximately 138 km long, comprising primarily of a HVDC offshore transmission link, with both HVDC and High Voltage Alternating Current (HVAC) onshore elements.
- 1.2.2 A detailed description of the Proposed Project is included in **Environmental Statement Chapter 4: Description of the Proposed Project [AS-018]**.

1.3 Project Development Post Application Submission

- 1.3.1 During the Pre-Examination period, National Grid has undertaken supplementary technical and survey work and continued engagement with stakeholders. National Grid has also reviewed Relevant Representations submitted by respondents on the Application and has received and responded to a number of letters requesting further information from the Examining Authority (ExA) under Section 89(3) of the Planning Act 2008. As a result of this ongoing work and dialogue, National Grid is proposing to incorporate five design changes into the Proposed Project.
- 1.3.2 National Grid submitted a **Notification of Change Request** (the “Notification Letter”) **[AS-138]** to the ExA on 16 September 2025 which outlined National Grid’s proposal to apply for amendments to the Proposed Project comprising Changes 1 to 5 set out below. The ExA responded to the notification letter on 17 September 2025 and issued a procedural decision under Rule 9 of the Infrastructure Planning (Examination Procedure) Rules 2010/103 (the “Examination Rules”) responding to the Notification of Change Request on 25 September 2025 (the “Rule 9 Letter”) **[PD-011]**.
- 1.3.3 This report requests five changes to the Application, these changes are:

- Change 1: Change to access at the hoverport
- Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation
- Change 3: Change to the Order Limits east of Friston to provide flexibility in relation to the heritage feature
- Change 4: Introduction of land at Benhall Railway Bridge into the Order limits
- Change 5: Increase in area for maintenance of a new hedge to south of B1119

1.3.4 The proposed changes are detailed in section 2 of this report.

1.4 Legislative Context and Guidance

1.4.1 National Grid has prepared the Change Request in line with [Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination - GOV.UK](#) (the Guidance) and additional requirements identified in the ExA's Rule 9 letter [PD-011].

1.5 Purpose of this Change Request

- 1.5.1 In line with Step 4 of the Guidance, this Change Request Report supports the DCO Application by:
- Explaining a confirmed description of the proposed change and where this changed from that provided in the Notification Letter (see Chapter 2 of this Report).
 - Providing a confirmed statement setting out the reasons and need for making the change and providing any further information that was not included in the Notification Letter (see section 1.3 of this Report);
 - Providing a full schedule of all application documents and plans listing the revisions to each document and plan which would occur because of the proposed change or as necessary marked as 'no change' (see Schedule of Changes to DCO Application Documents as shown in **Application Document 9.76.4** submitted in the Change Request);
 - Providing a statement identifying any impact the proposed change would have on securing any consents or licences for the Proposed Project, and confirmation if there would be any delay in securing these before the close of the examination (see Chapter 4 of this Report).
 - Providing clean and tracked change versions of the draft DCO (see **Application Document 3.1 (E) (version 2, change request) draft Development Consent Order** submitted with this Change Request) showing the proposed changes, and a clean and track change version of the draft explanatory memorandum (see **Application Document 3.2 (D) (version 2, change request) Explanatory Memorandum** submitted with this Change Request).
 - Confirming why additional compulsory acquisition powers are being sought in relation to additional land not included in the current Order Limits for the application for the Proposed Project as a result of the proposed changes and how the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) have been engaged (see Chapter 6 of this Report) A detailed description of how National Grid considers the procedures in regulations 6-19 of the CA Regulations

can be accommodated within the examination timetable is also provided. The Change Request includes:

- A Supplement to the Book of Reference (see **Application Document 4.3 (C) (version 2, change request) Book of Reference** submitted with this Change Request);
 - Land Plans identifying the additional land (see **Application Document 2.3 (C) (version 2, change request) Land Plans Part 1 of 2 and Part 2 of 2** submitted with this Change Request). (For the Change Request only the land plans relevant to the proposed changes have been updated);
 - A Statement of Reasons as to why the additional land powers are required (see **Application Document 4.2 (E) (version 2, change request) Statement of Reasons** submitted with this Change Request);
 - A statement indicating how it is proposed to fund acquisition of the additional land (a funding statement) (see **Application Document 4.1 (A) (version 2, change request) Funding Statement** submitted with this Change Request); and
 - A supplemental land rights tracker giving details of the status of negotiations and the additional land (see **Application Document 9.16 (A) (version 2, change request) Land Rights Tracker** submitted with this Change Request).
- Demonstrating, in the Change Request: Addendum to Volume 6 Environmental Statement (**Application Document 9.76.5**) that the proposed changes have been adequately assessed, and setting out the findings in the context of what was previously reported in the **Application Documents 6.1-6.15 Environmental Statement [APP-041 to APP-300 and updated documents]**. The assessment concludes that the proposed changes are not likely to result in any new or different likely significant environmental effects.
 - Any consultation bodies who might have an interest in the proposed change have been consulted, as shown in the Consultation Report (see **Application 9.76.3 New Document submitted with the Change Request**). The Consultation Report:
 - Confirms who has been consulted in relation to the proposed change and how and why they have been consulted;
 - Includes details of how National Grid has considered the content of the consultation responses received; and
 - Includes copies of all consultation responses received, including any responses to publicity about the proposed change. These are included as an annex to the Consultation Report.

2. The proposed changes

2.1 Summary

- 2.1.1 This section provides a description of each of the changes included in the Change Request. The location of each proposed change including the DCO Application Order Limits at each proposed change location and the proposed amendments to the Order Limits associated with each proposed change (where relevant) are shown in Appendix A to E of this Change Request. The relevant updated **Application Document 2.5 (version 2, change request) Works Plans** as included in this Change Request. The relevant drawings are referenced in the description of each proposed change.
- 2.1.2 A further round of targeted consultation was carried out in October- November 2025 and has informed this Change Request. In relation to land associated with land at change 3, further geophysical surveys have been completed since submission of the Notification letter **[AS-138]**. In relation to change 4, planning permission has been granted on land to the east on Benhall Bridge for housing since the Notification was submitted. To respond to these developments, National Grid has amended the proposed description for change 3 and change 4. In section 2.4 and 2.5 National Grid has provided the change description for change 3 and change 4 respectively as included in the Notification letter **[AS-138]** and explained how they have been amended to respond to developments since the issue of the Notification Letter **[AS-138]**.
- 2.1.3 The proposed changes apply to small and discrete areas of the Proposed Project and most of the Proposed Project would remain unchanged if the Change Request were to be accepted. The proposed changes do not affect the project description as presented in the DCO Application or the nature of the project. National Grid views the changes as design refinements that would deliver improvements to the design, reduce the impacts of the Proposed Project, and respond to comments from consultees.
- 2.1.4 In the Rule 9 Letter **[PD-011]** the ExA stated they were “*satisfied that the proposed changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was applied for*”. National Grid agrees with this position.
- 2.1.5 The amendments made to change 3 and change 4 since the Change Notification have reduced the amount of additional land to be added to the Order limits, so are more minor even than previously proposed.
- 2.1.6 The proposed changes are not being made to address any existing technical deficiencies associated with the application submitted for examination and as a result there should be no concerns regarding the veracity of the application submitted in March 2025.

2.2 Change 1: Change to access at the Hoverport

- 2.2.1 This change proposes to extend the Order Limits to provide National Grid with flexibility in the access route that vehicles will use across the hoverport to access the intertidal area at Pegwell Bay. The change will increase the area of the Order Limits at the hoverport to ensure that encroaching saltmarsh can be avoided (see Drawing

Reference DCO/K/WK/PS/0412 in **Application Document 2.5 (B) (version 2, change request) Works Plans** submitted with this Chapter Request).

- 2.2.2 The change would not increase the area used for construction of the Proposed Project as the vehicles would only use one route across the hoverport (and likely one of the existing ramps); nor would it change the number or types of vehicles accessing the intertidal area. The change would also not introduce any new development or works to the hoverport.
- 2.2.3 In August 2025 the extent of saltmarsh was recorded further down shore than had previously been recorded and it is now encroaching on the current Order Limits and the ramp access for construction, operations and maintenance (O&M) activities from the hoverport. Saltmarsh is a sensitive habitat, and National Grid has committed to the avoidance of impacts to this habitat in Pegwell Bay through the use of trenchless techniques at the landfall. By amending the Order Limits to include an additional access route to the intertidal area, the access route will also avoid the saltmarsh habitat.
- 2.2.4 National Grid considers it unlikely that the proposed change will result in any new or different likely significant environmental effects as the area in the extended Order Limits is formed of concrete and will be away from sensitive habitats i.e. saltmarsh. This is set out in the Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5**. In response to the ExA's Rule 9 letter **[PD-011]** the Change Request: Addendum to Volume 6 Environmental Statement considers if the proposed change has a construction and operational impact on the environment including saltmarsh, golden plover and on the recreational use of the area. Whilst there is no change to the reported environmental effects, given that the change will ensure avoidance of saltmarsh, the change is considered beneficial from an environmental perspective and is being made to reduce the potential impacts of the project on habitats in Pegwell Bay.
- 2.2.5 In response to the ExA's Rule 9 letter **[PD-011]** National Grid has included a commitment to undertaking a pre-construction saltmarsh survey to identify the extent of the saltmarsh habitat so that no impact to saltmarsh occurs. This is set out as REAC reference B67 in **Application Document 7.5.3.2 (B) (version 2, change request) Appendix B Register of Environmental Actions and Commitments**, as included in this Change Request.
- 2.2.6 In response to the ExA's Rule 9 letter **[PD-011]** National Grid acknowledges that the amended Order Limits include Manston Airport outfall. No works to Manston Airport outfall are proposed as part of the proposed change and National Grid confirms that Manston Airport service pipe was included in the Order Limits proposed in the DCO application. While the approximate location of Manston Airport outfall is known through site visits and aerial imagery, the fill extent and precise location of the outfall will be confirmed through survey during engagement with the asset owner. In addition, during detailed design the asset owner will be engaged on the location, standoffs and measures of protection for the outfall during construction and operation. This is similar to the approach that National Grid is undertaking for the other utilities present within the Order limits, as included in our DCO application. Riveroak Strategic Partners Ltd, the owners of Manston Airport outfall, were consulted as part of the targeted consultation on the changes although no response was received. Riveroak Strategic Partners Ltd submitted a Relevant Representation on the DCO application and National Grid has responded, and have requested a meeting to discuss the Proposed Project with them.
- 2.2.7 The proposed change is considered to be in line with planning policies in the National Policy Statements and Local Plan as set out in **Chapter 2 of the Environmental**

Statement [APP-043], to protect valuable habitats and designated sites; namely the saltmarsh and associated international designations.

- 2.2.8 National Grid acknowledges that the revised Order Limits do not exclude the current area of existing saltmarsh that National Grid proposes to avoid. Saltmarsh is a dynamic habitat and can change as a result of natural coastal events, therefore, the existing saltmarsh may be subject to change across the construction and operation. It is therefore beneficial for the ecology of Pegwell Bay for there to be flexibility in the location of the access to respond to the conditions at the time. This flexibility will ensure that National Grid can access and exit the intertidal area safely while still committing to not impacting the saltmarsh. The inclusion of a wider area does not indicate that National Grid will utilise a wider area than proposed previously. We will complete a pre-construction saltmarsh survey to identify the extent of the saltmarsh habitat to confirm the entry and exit points to the intertidal area during construction so that no impact to saltmarsh occurs.
- 2.2.9 National Grid also recognises that relevant representations have highlighted the hoverport frontage as a locally important walking and recreational area. This is considered in the Change Request: Addendum to Volume 6 Environmental Statement (**Application Document 9.76.5**) that supports this Change Request. Given that the change is about flexibility in the access over a small area and would not result in greater number of vehicles, more intensive use or a longer length of access there would be no change in the impact compared to the previous proposals.
- 2.2.10 This proposed change did not need to be amended in response to consultation and therefore the proposed change is the same as that included in the Notification letter **[AS-138]**.

2.3 Change 2: Change to Limits of Deviation Works Plans at Friston (Kiln Lane) substation, Suffolk

- 2.3.1 This change proposes to extend the area for Work 1B as set out in Schedule 1 the DCO Application (Friston (Kiln Lane) substation) to align with those consented through two Scottish Power Renewables (SPR) projects. This has been presented as a proposed change to the limits of deviation currently presented on the Proposed Project's Works Plans to align with the approach taken in the SPR Works Plans, see Drawing Reference DCO/K/WK/PS/0402 in **Application Document 2.5 (B) (version 2, change request) Works Plans**.
- 2.3.2 The National Grid Substation proposed at Friston as part of the Sea Link application already has consent as part of the East Anglia ONE North Offshore Wind Farm Order 2022 and the East Anglia TWO Offshore Wind Farm Order 2022 (SPR consents). It is anticipated that the substation will be constructed under the extant SPR consents, with the works undertaken under the Sea Link consent being connection works to the substation and related works, but not the substation itself.
- 2.3.3 Whilst the substation has consent, National Grid was not National Grid on the SPR consents and therefore does not have the benefit of the Order without it being transferred to National Grid. This transfer has not yet occurred. Given that the substation is an essential component of the Sea Link project, Friston (Kiln Lane) substation has been included in the Proposed Project Order Limits and the description of development. This enables the timely delivery of the substation under the Sea Link consent in the event that it is not delivered or delayed under the SPR consents. The approach means that there are two scenarios for development of the substation at

Friston, both of which must be examined as part of the Sea Link Examination. In the Sea Link Application, the scenario where the substation is constructed under the SPR consents is referred to as Scenario 1 and the scenario where it is constructed under the Sea Link DCO is referred to as Scenario 2.

- 2.3.4 At the date of submission of the applications for the SPR consents, it was not known whether Friston substation would include Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS). An AIS substation requires a larger footprint than a GIS substation so the area for Friston substation in the SPR applications was relatively large. By March 2025 when the Sea Link application was being submitted, National Grid had taken the decision to proceed with the GIS substation. As a result, the area for this substation in the Sea Link application and the limits of deviation around it were smaller in the Sea Link application than the SPR consents.
- 2.3.5 The detailed design of the Friston (Kiln Lane) substation has progressed under the SPR Consents and the proposed location is within the works area for the substation within the SPR Consents, but not entirely within the limits of deviation for the same substation in the Sea Link application. This only became clear when draft information produced to discharge requirements for the SPR consents was shared with the Sea Link team in June 2025, post submission of the application for the Proposed Project.
- 2.3.6 National Grid considers that the discrepancy between the two sets of plans should not be an issue because:
- If Friston substation is constructed under the SPR consents (Scenario 1), National Grid would not implement this part of the Sea Link consent and there remains significant flexibility within the Sea Link draft Order Limits for the cables to connect to the new location (which is very close to the Sea Link limits of deviation (LoD)); and
 - if the substation is constructed under the Sea Link DCO (Scenario 2), it could instead be constructed in the location shown by the current Friston substation LoD in the Sea Link Works Plans.
- 2.3.7 However, the different locations are making it challenging for SPR and National Grid to develop consistent plans showing, for example, landscaping and drainage around the substation. Key stakeholders have emphasised in Relevant Representations and informal discussions that there is a need for consistent plans to reassure the local community that National Grid is not aiming to produce a different design to that being progressed under the SPR consents.
- 2.3.8 Consistent plans would also reduce the complexity of plans for the site to aid their interpretation; something that has been raised by key stakeholders and is apparent in questions asked by the ExA in Section 89(3) letters issued to National Grid following submission of the application. National Grid is sympathetic to concerns raised, which can be more easily addressed if the area for the substation is made consistent across the applications. This will also assist the Examining Authority in examining the two scenarios as there will then be fewer differences between them.
- 2.3.9 The different locations also present complexity in the highly unlikely event that SPR were to start but not complete construction at the site. In this event and if this Change Request is not made and accepted, National Grid would not be able to complete construction of the substation under the Sea Link consent without demolishing the partially constructed substation and re-constructing in a slightly different location.
- 2.3.10 Therefore, the change alters the limits of deviation for Work 1B (and Work 4 as relevant) to be consistent with the area for the same work in the SPR consents. This would not

allow construction of the substation outside the area already consented under the SPR consents. It would not require any change to the Sea Link Order Limits or the Land Plans. All land within the revised area would be required for the Proposed Project as a whole and the size of the substation would remain as previously proposed, just with more flexibility over its location.

- 2.3.11 In response to the ExA's Rule 9 letter **[PD-011]** the Proposed Project's visualisations have been updated with the amended Limits of Deviation and are appended to the Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** submitted with the Change Request. The visualisations have been updated to show the updated substation limits of deviation. The location of the Kiln Lane substation has not changed from that considered in the Environmental Statement because it is standard practice for visualisations to show an aspect of development at a single point within the limits of deviation. The substation as presented in the altered limits of deviation has already been determined to be acceptable in the SPR applications.
- 2.3.12 In addition, Figure 5 in the Outline Landscape and Ecological Management Plan, see **Application Document 7.5.7.1 (B) (version 2, change request) Outline Landscape and Ecological Management Plan – Suffolk** as submitted with this Change Request has been updated to reflect the amended Order Limits and limits of deviation associated with the proposed change. The minor nature of the proposed change is not anticipated to result in any new or different significant environmental effects to those reported in the ES, as is confirmed in the Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** submitted with the Change Request.
- 2.3.13 The proposed change will not change the compliance of the project with planning policies as set out in the Planning Statement **see Application Document 7.1 Planning Statement [AS-030]**.
- 2.3.14 The change would make no difference to the drainage proposals for the site. Details of drainage would be finalised during detailed design, informed by the detailed design of the infrastructure, location of the substation and surrounding development on the site. However, given that points have been raised on drainage in response to this change at hearings, National Grid would confirm that there is sufficient space within the Sea Link Order limits for National Grid to deliver the drainage that is currently being progressed to discharge requirements on the SPR consents and National Grid does not intend to deliver a different approach to drainage on the site as a whole compared to that being discussed with SPR. National Grid and SPR are working closely together on the drainage on the site, including National Grid reviewing and feeding into plans being developed to discharge requirements on the SPR consents. The reason plans do not yet align is due only to the fact that SPR proposals are not yet finalised and National Grid cannot, therefore, yet reflect them in the plans for Sea Link.
- 2.3.15 National Grid updated the Proposed Project's Works Plans at Deadline 1 to add a works number for drainage. Areas for drainage were not previously shown on the Works Plans in the submitted DCO application as drainage was covered as associated development in Schedule 1 Part 1 (2) rather than having a separate Works number. It was clear from Relevant Representations that stakeholders would appreciate reassurance that National Grid would have the ability to develop the same drainage as was being designed under the SPR consents. The updated Works Plans (see Drawing Reference DCO/S/WK/PS/0402 Rev B in **Application Document 2.5.1 Work Plans – Suffolk**)

submitted at Deadline 1 shows the areas for drainage, including those areas being proposed for drainage by SPR.

- 2.3.16 The Environmental Impact Assessment, see **Application Document 6.2 Park 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** assessed the impact of Friston (Kiln Lane) substation at a maximum height of 18 m based on a finished ground level. No change to the height of Friston (Kiln Lane) substation is proposed as part of change 2. However, the updated version of the draft DCO submitted at Deadline 1 provided a commitment to a maximum height of 16 m for Friston (Kiln Lane) substation. This is lower than has been assessed in the Environmental Statement. However, the Environmental Impact Assessment has considered a worst case scenario and there would be no change to the significance of effect as documented in the **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual of the Environmental Statement [APP-048]** as a result of this height reduction.
- 2.3.17 The update to the limits of deviation being undertaken for change 2 is not a change to the development or works proposed. In response to the ExA's Rule 9 letter **[PD-011]** the amended limits of deviation were updated on plans included in the Consultation Document **[CR1-003]** that informed the targeted consultation.
- 2.3.18 This proposed change did not need to be amended in response to consultation which included neighboring residents to the proposed location of change 2 and relevant Internal Drainage Board (Water Management Alliance (East Suffolk Drainage Board), as requested in the ExA's Rule 9 letter **[PD-011]**. Therefore, the proposed change is the same as that included in the Notification letter **[AS-138]**.
- 2.3.19 For avoidance of doubt and to respond to queries raised by the Examining Authority and by consultees on the targeted consultation, National Grid can confirm that the limits of deviation presented in the change notification letters are those included in the SPR DCO application and were (and are) correct. SPR's Outline Landscape and Ecological Management Strategy (OLEMS) (version 07) (reference **[REP13-007]** in the East Anglia Two Examination Library) shows a substation within their limits of deviation but not at the fullest extent (ie the most eastern point) of their limits of deviation as shown on SPR's Works Plans (version 07) (reference **[REP11-004]** in the East Anglia Two Examination Library). The SPR Works Plans are the definitive plans providing consent for the works at the substation, whilst the plans in the OLEMS are illustrative only. Change 2 reflects the limits of deviation as shown in the definitive plans rather than following the boundary of the limits of deviation shown in SPR's OLEMS. National Grid understand that the discrepancy between different plans within the SPR applications may be the reason that some consultees thought that the revised limits of deviation presented in the change notification were not correct.

2.4 Change 3: Change to the Order Limits at Friston to provide flexibility in relation to heritage feature, Suffolk

Change 3 as set out in the Notification Letter

- 2.4.1 In National Grid's Notification Letter **[AS-138]** this change proposed to amend the Order Limits to remove a potential Neolithic hengiform monument feature from the Order Limits and to introduce additional land to enable the underground cable to be routed around the feature. The proposed revision to the Order Limits would have allowed a 30 m buffer between the amended Order Limits and the identified feature.

- 2.4.2 The potential henge was recorded during trial trenching completed in July 2025, after submission of the DCO application for the Proposed Project. A feature in this location was previously identified through geophysical survey but was assessed by heritage specialists as likely to be a partial enclosure associated with a prehistoric field system. Therefore, the geophysical survey did not identify this area as being an area of high risk for heritage and was therefore not prioritised in the trial trenching programme. This area was one of the last to be surveyed because it was not associated with one of the more substantial elements of development (e.g. a substation), it was not identified as being high risk for heritage, and was timed to reduce damage to crops.
- 2.4.3 It is common for trial trenching programmes for underground cable routes and pipelines not to be available to inform the Environmental Statement and to be carried out in whole or in part after consent of a project. Regarding this point, the Examining Authority for the Viking CCS Pipeline stated the following, in their Recommendation Report: *‘the ExA consider that it would be disproportionate for the entire construction corridor to have been surveyed at this stage of the process, and it is inevitable that archaeological works and investigations would be iterative and reactive during both preconstruction and construction phases. So, the lack of knowledge regarding the full extent of archaeological deposits is not a specific concern of the ExA at this stage, and there is acknowledgement across National Grid’s documentation that mitigation would need to apply to unknown archaeological finds’*. National Grid has taken a proportionate approach, mindful of its duties and it is positive that this feature has been identified now rather than post consent.
- 2.4.4 Evaluation trenching undertaken post-DCO submission initially indicated that the enclosure was more substantial than had been thought following the geophysical survey and potentially represented a henge monument. Engagement with Historic England and the County Archaeologist for Suffolk was completed in July 2025 following the trial trenching, and they considered that the asset meets some or all of the criteria (rarity, survival, group value etc) for scheduling. The Order Limits at this point in the cable corridor were narrow because efforts were made to reduce the land required for construction of the project in line with requirements of the Compulsory Acquisition process. The narrow Order Limits at this point meant that the underground cable would pass through the potential henge feature, potentially leading to significant adverse effects on the heritage asset. The design also included a haul road along the cable alignment for construction purposes, which was also likely to adversely affect any above ground elements of the feature.
- 2.4.5 The team explored whether a potential solution would be to use trenchless techniques, such as Horizontal Directional Drilling (HDD), to install the cable under the asset. However, this solution was rejected because it would be challenging to identify the depth at which the asset would remain unharmed and therefore difficult to rule out harm to the asset. Given the potentially high value of the asset, this was not considered by National Grid to be an acceptable risk. This solution would also provide a gap in the haul road, which would need to be re-routed, so would not avoid the need for a change to accommodate a new access solution.
- 2.4.6 Therefore, the only option that National Grid was confident that would avoid a significant adverse effect on the suspected henge feature was to expand the Order Limits to enable the cable to be re-routed around the feature. Archaeological work to date had provided a good indication of the size of the asset and it would be unusual to find significant archaeology in close proximity to the suspected henge due to the form of the monument and the way henges were used, as well as information we have from evaluation trenching that has been undertaken to date. However, given that the area

outside the current Order Limits had not yet been fully subject to geophysical survey or trial trenching, it was felt to be necessary to include sufficient flexibility within the Order Limits for the cable to re-route either to the east or the west of the asset at the Notification stage, and to allow sufficient space to microsite the route alignment.

- 2.4.7 The statutory heritage stakeholders (Historic England and the Suffolk County Archaeologist) had advised that avoidance through extending the Order Limits, as proposed above, was their preferred approach so National Grid's understanding was that this approach was supported by heritage stakeholders. The solution was also discussed with East Suffolk Council (ESC) and Suffolk County Council (SCC), who also expressed the view that this was the most appropriate solution.

Change 3 as Proposed in the Change Request

- 2.4.8 Further geophysical survey of the landscape around the possible henge feature was completed in October 2025 and indicated that the feature no longer appears to be a henge, but some kind of stock enclosure. The geophysical survey also identified potential archaeological features of interest in the area to the west of the heritage feature and no potential archaeological features in the area to the east of the heritage feature, where the Order Limits were proposed to be extended as set out in the Notification Letter **[AS-138]**.
- 2.4.9 In response to the ExA's Rule 9 letter **[PD-011]** the geophysical survey report is included as appendix to the Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5**.
- 2.4.10 Engagement with Historic England and the County Archaeologist in October 2025 concluded that the heritage feature present is not of potential national significance, nor is it of schedulable quality, but rather of regional significance. The Applicant is still proposing to undertake additional evaluation trenching in the area within the amended Order Limits to better understand the enclosure and the surrounding archaeology but this is now unlikely to result in any further changes to the powers sought in the DCO.
- 2.4.11 As a result of the further survey and subsequent discussions with heritage stakeholders, and to ensure the additional rights sought are necessary and proportional, National Grid has reduced the proposed extension to the Order limits in the area of change 3 for the Change Request. This removes the option of routing the cable and haul road to the west of the feature in response to the geophysical survey results showing potential archaeological features of interest in this area. This approach is supported by Historic England and the County Archaeologist. However, the Change Request retains two options:
- 1. Route the cable route and haul road through the enclosure.** Given the reduced level of significance this option was considered acceptable by heritage stakeholders. However, heritage stakeholders noted that if this route was taken the whole asset should be excavated to record information about the asset. Therefore, the Order Limits in this area have been widened to enable this full excavation if this option is taken forward.
- 2. Route the cable route and haul road around the feature to the east.** This option would avoid the feature entirely, avoiding the need for excavations. This option is also understood to be acceptable from a heritage perspective.
- 2.4.12 The Change Request retains both options at present given that further investigation is planned to establish the value of the area to the east of the site and look in more detail

at both options to determine the best outcome. The eastern extent of the amended Order Limits is the same as those proposed in the Notification letter, but the area of the enclosure has been added back in, including the full area of the feature. The western extent of the amended Order Limits as proposed in the Notification Letter **[AS-138]** is removed from the proposed Order Limits in response to the geophysical survey results that potential archaeological features of interest may be present in this area. This approach is supported by Historic England and the County Archaeologist.

- 2.4.13 A Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** submitted with the Change Request

2.5 Change 4 – Benhall Railway Bridge

Change 4 as set out in the Notification Letter

- 2.5.1 In National Grid's Notification Letter **[AS-138]** this change proposed to introduce land into the Order Limits along the B1121, including Benhall Railway Bridge over the railway and associated land along the highway to the east and west of the bridge between the A12 and Grays Lane/ Forge Close. The proposed change also included additional land to the east of the B1121 and a small stretch along the railway line.
- 2.5.2 The main access to the proposed new converter station in Suffolk crossed the bridge on the B1121 known as Benhall Railway Bridge. Suffolk County Council's Relevant Representation dated 29 May 2025 stated that *'The structural condition of the bridge means that it has been restricted to STGO (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads ("AILs") due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12. Additionally, Benhall Railway Bridge is not currently included within the Draft Order Limits for the Sea Link proposals'*.
- 2.5.3 This weight limit on Benhall Railway Bridge would not be an impediment to the majority of construction traffic accessing the converter station as loads would not exceed the weight limit. However, it could be a factor in planning the movements of the Abnormal Indivisible Load (AIL) vehicles associated with the transport of seven transformers, a piling rig and a mobile crane. The final detail of Abnormal Indivisible Load (AIL) routing and solutions for movements is typically developed after a DCO is made when the loads and programme for movements is known. This is partially because the loads and programme for delivery will only be known in detail when a contractor is on board; and partially because the condition of the public highway is constantly changing so there is potential for change between the Application and construction (for better or worse). However, National Grid agreed to look at the solution for Benhall Railway Bridge as part of the Change Request to provide reassurance to SCC and ESC that the proposed solutions were feasible and acceptable.
- 2.5.4 National Grid's previously anticipated solution was to install a 'mini-bridge' overbridge structure within the highway boundary that would avoid weight being placed on the bridge abutments to the restricted limits; with the mini-bridge anticipated to be installed on approximately 15 occasions over the 4-year construction period. This solution would have been achieved without the area of highway required being included in the Order Limits due to the powers already in the Order and consents to be obtained outside the DCO. However, SCC and ESC raised concerns that Benhall Bridge was not within the

Order Limits of the project, stating that the consenting mechanism for those works were not clear. To respond to the concerns raised by SCC and ESC in meetings, consultation and Relevant Representations, National Grid proposed to add the areas of highway required for this solution into the Order Limits for the Proposed Project.

- 2.5.5 Further, on 6 August 2025 a meeting was held between National Grid, SCC and ESC, including a discussion on Benhall Railway Bridge. Three main options were discussed for enabling the vehicles over the weight limit to cross the bridge:
- 1. Installation of the ‘mini-bridge’;
 - 2. Minor works to repair the bridge; or
 - 3. Installation of a semi-permanent overbridge structure.
- 2.5.6 Option 1 could be completed entirely within the highway, but it was acknowledged as preferable for adjacent land to be available for a compound during installation and storage of materials between installations. Reduced highway closure durations may have been possible if this adjacent land was available, and it would potentially avoid the bridge being transported to and from an off-site location between uses. It also provided more flexibility in terms of how the overbridge was assembled and moved into place. SCC expressed concern that a methodology developed later may require this additional land and whilst National Grid was confident this was not the case, the inclusion of additional land increased flexibility and provided reassurance that this solution was possible to implement.
- 2.5.7 Option 2 would involve intrusive investigation work to clarify the condition of the bridge and any issues experienced. The initial investigation undertaken by SCC was not intrusive and did not provide certainty on the bridge condition so further study would be required to define any remedial works that could be undertaken to bring the bridge back up to standard. Should those remedial works be of a scale and programme that was reasonable for National Grid to implement, National Grid had agreed to consider implementing Option 2. Option 2 could deliver additional benefits by permanently improving the highway as well as removing the need for road closures to install overbridges both for the Sea Link project and any future projects such as LionLink. It would provide a permanent solution to the issue rather than the temporary solution offered by Option 1. National Grid recognised the additional benefits offered by Option 2 as discussed with SCC in August 2025.
- 2.5.8 Option 2 would require establishment of a temporary compound, ideally adjacent to the bridge, and access to the bridge for investigation and improvement works. This access would include access to the underside of the bridge, so would also require access to a short section of the railway. The inclusion of land to the east of the B1121 and a limited area along the railway line was included in the Notification to enable consideration of this option. National Grid regularly obtains consents and permissions to carry out works on Network Rail land for normal operational and construction purposes and was seeking to engage with Network Rail to agree consents prior to consent to carry out investigative works and confirm the feasibility of Option 2.
- 2.5.9 Option 3 would involve installation of a semi-permanent overbridge structure. This is a structure that would be installed for the duration of the works rather than the mini-bridge structure that would be installed and removed for each one or two-way movement. This option was considered likely to have more adverse environmental and traffic impacts than the mini-bridge so was not preferred; but in advance of detailed work by the contractor had not been ruled out. It was considered possible that this may have become the preferred option if investigative work to the bridge showed that it may have

been a better solution, or potentially if the LionLink project would generate greater movements over the bridge that justify a semi-permanent solution to address traffic for both projects. This option would have also required land to the east of the bridge outside the highway boundary for the construction of the bridge, a compound and a crane to lift the bridge into place.

- 2.5.10 National Grid's proposed change to the Order Limits as presented in the Notification would provide the flexibility to implement all three options currently under consideration; enabling joint working with SCC to explore the best option. Use of adjacent land to the east would be temporary as any AIL access during the operational period could be undertaken using Option 1 within the highway boundary or with no works required if Option 2 is taken forward. Option 3 is only justified for multiple movements so would not be a preferred option during the operational period.
- 2.5.11 All options would involve work within the highway boundary and adjacent to the boundary for establishment of a temporary compound on an agricultural field. No trees would be removed to facilitate the works. It is likely that a section of hedgerow would need to be removed to enable construction and operation of an access to the land to the east. The proposed revised Order Limits as presented in the Notification allowed both for an access directly from the B1121 and from Shotts Meadow in advance of discussions with the landowner and SCC on how the parcel might be best accessed. The existing field access from Shotts Meadow would require the removal of a very small section of hedgerow, likely less than 5 m. The access along the B1121 would require greater temporary hedgerow removal for a new access and the required bellmouth and visibility splay. This was anticipated to be a maximum of 35m of hedgerow, subject to design. Any affected hedgerow for provision of access could be reinstated when use of the adjacent land ceased unless otherwise agreed with the landowner (see below).
- 2.5.12 No significant groundworks would be required so there would be no anticipated significant adverse effect on archaeology and there would be no loss of agricultural land. For all options construction noise and dust issues would be temporary, short in duration and not occurring adjacent to residential properties. Therefore, whilst there may be a need for temporary hedgerow removal for the access, National Grid considered it unlikely that the proposed change would result in any new or different likely significant environmental effects to those documented in the Environmental Statement. The area in the extended Order Limits was primarily an agricultural field and existing highway; so provided habitats that were similar to habitats found elsewhere within the Order Limits, as considered in the DCO application.
- 2.5.13 The area of land to the east of the B1121 was allocated for housing in the Suffolk Coastal Local Plan (Adopted September 2020); it was the site known as 'Land South of Forge Close between Main Road and Ayden, Benhall' (SCLP12.43). The land proposed for temporary construction and storage would include the majority of this allocated land. The temporary use of the site by National Grid would not affect the long term development of the site for housing.
- 2.5.14 The allocated site was subject to an Outline Planning Application for 41 dwellings submitted in May 2021. The application was remaining 'awaiting decision' in September 2025, with no new documents uploaded on the application since October 2024. National Grid was in discussions with East Suffolk Council to understand the position with this application and was similarly commencing discussions with the landowner on a potential land agreement and the status of the application; but East Suffolk Council had been unable to provide National Grid with guidance on the status of the application.

- 2.5.15 Given the timescale elapsed on the application between May 2021 and September 2025 and the need for further Reserved Matters applications before work begins on site, it was considered unlikely that the site was likely to be developed imminently, although National Grid was seeking to understand the programme to confirm. Option 1 could proceed without this land so if there was a conflict between the development of the site and use of the site as a compound/ lay down area for Option 1 the mini-bridge could be installed within the highway boundary and stored off site to avoid a conflict between development of the allocated site. Option 2 would likely only be feasible if carried out in advance of construction of the Proposed Project, so would likely be completed prior to development of the housing site. Should Option 3 be selected, the programme would be managed in partnership with the developers to minimise disruption and Options 1 and 2 could be implanted if there was a significant issue with Option 3.
- 2.5.16 It should be noted that the planning application for the housing site would require construction vehicles and residents to access the site from the B1121, with a new access proposed in a similar position to that proposed by National Grid to this land parcel. Construction of this access would require removal of hedgerow similar to that required for the temporary use of the field by National Grid. Should it be beneficial to the delivery of a site allocated in the Local Plan, National Grid could construct and leave in place the access from the B1121, potentially facilitating development. Further, given that the A12 was the other side of Benhall Railway Bridge from the allocated site, future deterioration of the bridge could affect access to the site and it would be beneficial to future residents if Option 2 were explored now rather than later when limited land is available adjacent to the bridge to facilitate construction works. Therefore, whilst inclusion of the land may, in the worst case scenario, delay development of the allocated site; in the best case scenario it may accelerate construction and give more certainty that the site can be accessed from a main road efficiently in the long term. It is therefore considered that inclusion of this land did not conflict with the Local Plan.
- 2.5.17 National Grid was engaging with landowners of affected parcels, including Network Rail, to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it had not been possible to gain their formal consent for the proposed change in advance of the Change Notification.

Change 4 as Proposed in the Change Request

- 2.5.18 In the period between submission of the Notification and this Change Request, National Grid held discussions with the landowner of the land adjacent to Benhall Railway Bridge (and their agents dealing with the planning application) and East Suffolk to better understand the position with the housing application. These discussions indicated that whilst the application had not progressed for a long time, it was now progressing. On 28 October 2025, after issue of the Notification Letter, the application (application reference DC/21/2503/OUT) for up to 41 residential dwellings was recommended for approval and unanimously approved by the East Suffolk District Council Planning Committee. The landowner also confirmed that the intention was for the site to progress in early 2026 and that use of this area for a compound would potentially delay progression of an allocated housing site; the landowner would therefore object to use of this area for a compound.
- 2.5.19 This change in position on the planning application would mean that use of this area for a compound could have an adverse effect on the delivery of the Council's five year housing land supply; introducing a new conflict with the Local Plan.

- 2.5.20 Concerns were also raised by local residents over the use of this field for a compound and the potential impacts.
- 2.5.21 Whilst it would be beneficial to use the adjacent field for a compound for Options 1 and 2; it is not necessary for the delivery of either option. Use of the adjacent field was considered necessary for Option 3 as this would have required use of a crane to install the temporary bridge and this was not considered feasible from other adjacent land. However, further consideration of Option 3 from an environmental perspective confirmed that this option performed worst of the three in terms on traffic impacts; and hedgerow removal associated with use of the site for the compound could be avoided with Options 1 and 2. Discussions with SCC and ESC in August 2025 where all options were discussed did not suggest that Option 3 was preferred by any party. Given that other, better options are available, it was considered that the adverse effect on the housing proposal was not justified and the adjacent land has not been included in the Change Request. Only the land within the highway boundary and Network Rail ownership boundary (see Drawing Reference CHANGEAPP/S/LRP/S/0117in **Application Document 2.3 (C) (version 2, change request) Land Plans**) is included in this Change Request.
- 2.5.22 The Change Request will still enable Options 1 and 2 to be implemented by National Grid:
1. Installation of the 'mini-bridge' within the highway boundary only;
 2. Minor works to repair the bridge.
- 2.5.23 A Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** submitted with the Change Request has been prepared and it concludes that the proposed change is not likely to result in any new or different likely significant environmental effects to those documents in the Environmental Statement. In response to the ExA's Rule 9 letter **[PD-011]** National Grid has considered any effects on the highway network for the two proposed options in more detail. An assessment of the traffic impacts associated with both Options is included in the Change Request: Addendum to Volume 6 Environmental Statement **Application Document 9.76.5**. The Addendum concludes that there will be no likely significant environmental effects associated with either the installation of a mini-bridge or minor bridge repairs; both of which would be activities normally delivered using permitted development rights. It should be noted that details of traffic management and length of road closures are not generally known at the application stage and the impact of these closures has therefore been considered in more detail than is typical for a DCO application. However, this detail has been provided given the interest from local communities and key stakeholders on the AIL solution for Benhall Bridge.

2.6 Change 5 - Increase in area for maintenance of a new hedge to south of B1119

- 2.6.1 This change proposes to broaden the strip of land south of the B1119 in Suffolk to accommodate a new hedge alongside the existing drainage and water main, see Drawing Reference DCO/S/WK/PS/0401 in **Application Document 2.5 (B) (version 2, change request) Works Plans**. This proposed change is in response to landowner feedback around the maintenance approach to the drain and to provide flexibility in how the future planting will be maintained.

- 2.6.2 The new hedge in this location is included in the Environmental Statement and is essential mitigation. It is presented as mitigation in APP-348 (superseded by AS-059) (see **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**). The hedgerow is predominantly proposed for landscape and visual purposes, although it also would have benefits in providing ecological connectivity.
- 2.6.3 The area of the Order Limits along the B1119 is very narrow near Fristonmoor Lane. National Grid deliberately kept these narrow to minimise the impact on the adjacent fields and landowners. A concrete drain lies adjacent and parallel to the road, which National Grid believes is constructed predominantly to drain the highway, although National Grid has not been able to confirm with certainty whether or not it is a highway asset. One of the landowners of a field to the south of the road has made National Grid aware that this drain is currently maintained by the landowner from his field to the south, rather than the highway authority from the road, and that it is also connected to field drains. Concerns were raised that if it was not possible to maintain the ditch from the field, this may result in the drain becoming blocked and the road flooding as a result.
- 2.6.4 Planting a hedge between the field and the drain without a strip to enable the drain to be maintained from the south would prevent maintenance from the field. The landowner also raised concerns about the health and safety implications of maintaining the drain from the road and the suitability of his equipment to do this.
- 2.6.5 The strip of land along the B1119 previously in the Order Limits was sufficient for the existing drainage and adjacent proposed planting, but it was not sufficient to also include a maintenance strip between the two. The proposed change would amend the Order Limits to the south of the road to provide sufficient space to provide a strip of land between the new planting and the drain to enable maintenance of both; and a strip to the south of the planting to enable National Grid to maintain the planting if the landowners would not like to in the future. This additional space also enables the planting to be located further from the existing Northumbrian Water Group (NWG) water main (operating in the locality as Essex and Suffolk Water); although it is anticipated that hedgerow planting will be acceptable above the main as it is now.
- 2.6.6 A Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** submitted with the Change Request has been prepared and it concludes that the proposed change is not likely to result in any new or different likely significant environmental effects. The area in the extended Order Limits are similar to those habitats found elsewhere within the Order Limits, as considered in the DCO application and the proposed change is limited to moving a proposed hedgerow a short distance to the south. The proposed change would also have no implications for compliance of the project with national and local planning policy.
- 2.6.7 National Grid has been liaising with landowners of affected parcels to explain the requirement for additional land and seek agreement for the proposed change. However, given the timescales and land interests involved it has not been possible to gain their consent for the proposed change in advance of this Change Request notification.
- 2.6.8 No consultation feedback was received that required an amendment to this proposed change, therefore there is no change to that which was proposed in the Notification Letter.

3. Addendum to Volume 6 Environmental Statement

3.1 Overview

- 3.1.1 A Change Request: Addendum to Volume 6 Environmental Statement has been prepared for the proposed changes as shown in **Application Document 9.76.5**. The Addendum assesses whether any of the proposed changes individually or in combination would result in any new or different significant environmental effects compared to those reported in the Environmental Statement.
- 3.1.2 The Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5** concluded that the five changes would not result in any new or different significant environmental effects compared to those reported in the Environmental Statement when considered individually or cumulatively. The conclusions of the Environmental Statement submitted in support of the DCO application for the Proposed Project remain valid.
- 3.1.3 The Change Request: Addendum to Volume 6 Environmental Statement **Application Document 9.76.5** also provides additional information on the impacts associated with the temporary road closures at Benhall Bridge. Information on the exact nature of temporary traffic management, road closures and diversions is not usually known until after consent given that these proposals should be informed by the construction programme, vehicle points of origin, other works on the network, existing highway condition and size of vehicles. As a result, whilst National Grid set out areas to be affected by traffic management in the Traffic Regulation Order plans [**APP-024**] (including the B1121 at Benhall Bridge) and submitted an Outline Construction Traffic Management Plan [**AS-008**], the details of traffic management would be set out in the final Construction Traffic Management Plan submitted under requirement 6. Details of AIL vehicle movements in particular are also determined through a separate process post consent. Notwithstanding this, the Applicant has chosen to carry out additional more detailed assessment of the likely length and impact of road and public right of way closures at Benhall Bridge to respond to comments raised. The Applicant has also made small amendments to associated control documents (as detailed in the Addendum) to provide confidence in how the closures would be managed.
- 3.1.4 It should be noted that the need for vehicles to cross the bridge and for temporary traffic management to facilitate measures to enable AIL crossings was already present in the original project and this does not therefore represent a change to the construction traffic approach; it is merely that additional detail is available to carry out a more detailed assessment, in response to comments raised.
- 3.1.5 National Grid notes that there is no statutory requirement to consult on or publicise supporting environmental information under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and this is confirmed at Step 4 of the Guidance which states:
- 3.1.6 *"If the proposed change results in any new or different likely significant environmental effects, provision of other environmental information as necessary and confirmation that:*

- *the effects of the proposed change have been adequately assessed and that the environmental information has been subject to publicity. Whilst this is not a statutory requirement, the publicity should reflect the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017).*
- *any consultation bodies who might have an interest in the proposed change have been consulted (reflecting the requirements of the EIA Regulations 2017). The applicant should identify those consultation bodies who were consulted on the proposed changes but were not consulted on the original application”*

- 3.1.7 As National Grid’s Addendum to Volume 6 Environmental Statement concludes that there will be no new or different likely significant environmental effects as a result of the Change Request, National Grid does not consider that there is a requirement in either legislation or in the Guidance for any further publicity to be undertaken following the process set out in the EIA Regulations and that it would be unnecessary and disproportionate in respect of the nature of the changes proposed in the Change Report.
- 3.1.8 In any event, National Grid has consulted with the key relevant stakeholders on the proposed changes as set out in the Change Request and has had regard to their comments and responses to consultation, as set out in section 4 of this Report and the Consultation Report see (see **Application 9.76.3 New Document submitted with the Change Request**).
- 3.1.9 In addition, there is sufficient time remaining in the Examination (a period of over five months) for the ExA to examine and invite comments for statutory stakeholders on the Change Request to the extent that the ExA considers appropriate and necessary. If the ExA deems it appropriate, or necessary to carry out any publicity in accordance with the requirements of the EIA Regulations, National Grid considers that this can be accommodated within the Examination timetable.

4. Position Regarding Other Consents or Licences

4.1 Overview

- 4.1.1 In accordance with the Guidance, National Grid has given consideration to whether the proposed changes would affect any of the other consents and licences that National Grid may be required to obtain outside of the DCO process.
- 4.1.2 National Grid confirms that additional land is required outside of the current Order Limits for proposed changes 1, 3, 4 and 5. This is addressed in section 6 of this report,
- 4.1.3 No further consents or licences outside of the DCO are required as a result of the proposed changes. The position as to additional consents, licences and agreements and the likely timescales for obtaining those remains as set out in the **Application Document 3.5 Consents and Agreements Position Statement [APP-010]**.

5. Consultation and Engagement

5.1 Development of Approach to Consultation

- 5.1.1 National Grid carried out consultation and informal engagement on the proposed changes, including briefings for key stakeholders, discussions with landowners and topic specific meetings over the period from September to November when the changes were being considered. National Grid also carried out a non-statutory consultation exercise was carried out over a period of 31 days commencing on 7 October 2025 and closing at 23:59 on 7 November 2025; this included consultation with consultees identified under Section 42 (a-d) of the Planning Act 2008 insofar as they would be affected by the changes; in addition to consultation with nearby residents where appropriate.
- 5.1.2 National Grid also met with the Planning Inspectorate to provide a briefing on the proposed changes on 11 September 2025.
- 5.1.3 The approach to consultation, including both the method of consultation and list of consultees, was formally presented to the Examining Authority (ExA) in the Change Notification issued on 16 September 2025 **[AS-138]**. The proposed approach to consultation was developed in accordance with the guidance set out in Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination. Consultation on changes prior to submission of a Change Request is non-statutory, and developed to be proportional to the nature of the changes and their purpose, which is to reduce the effects of the project and address comments raised by communities and stakeholders.
- 5.1.4 The ExA recognized the contained nature of the changes in the Rule 9 letter **[PD-011]**, stating that:
- ‘The ExA notes that the five potential change requests have been developed following technical and survey work, and seek to respond to concerns raised during engagement with stakeholders and through relevant representations. Each potential change is relatively contained in scope and relates to site-specific matters identified during pre-examination.’*
- 5.1.5 The ExA provided formal comments on the approach in the letter dated 25 September 2025 **[PD-011]**. This ExA recommended the following in terms of consultation on the changes:
- **Changes 1, 3, 4 and 5:** no changes suggested by the ExA to consultation approach
 - **Change 2:** the ExA recommended that neighbouring residents would *‘be consulted as the increase in the limits of deviation could result in the substation being closer to them than is currently proposed under Friston Scenario 2.’* The Examining Authority also recommended that the Internal Drainage Board were consulted on this change and that a revised Work Plan for this area is presented in the consultation documents. The nearest residents to the change were consulted as shown in Plate 2.2 in the Consultation Report submitted with this Change Request (**Application**

Document 9.76.2) and the Water Management Alliance (East Suffolk Drainage Board) were consulted on this change as confirmed in Table 2.1 of the Consultation Report. A revised Works Plan was also presented in the Consultation Document discussed below.

- 5.1.6 The approach the Applicant took to consultation therefore complied fully with all advice provided by the ExA. National Grid provided a response to the Rule 9 letter on 7 October 2025 **[CR-001]**, providing further information to assist understanding of the changes and to confirm how National Grid proposed to address comments raised in the consultation on the changes and the Change Request.
- 5.1.7 National Grid has provided a Consultation Report, see **Application Document 9.76.4 (A) Consultation Report** submitted with this Change Request which confirms who has been consulted in relation to the proposed changes and how National Grid has considered the content of the responses received. A summary of the consultation that has been undertaken is set out below.

5.2 Consultation Methods

- 5.2.1 National Grid carried out two different types of consultation; a formal round of non-statutory consultation and informal engagement with key stakeholders.

Non-statutory consultation

- 5.2.2 The Applicant ran a non-statutory consultation period from 7 October 2025 until 7 November 2025 to consult on the proposed changes.
- 5.2.3 In line with the Guidance, the Applicant consulted all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 who would be affected by the proposed change.
- 5.2.4 The changes were minor in nature, geographically limited and would result in no new or different significant environmental effects. This means that the number of parties affected is relatively limited. However, National Grid sought to go beyond what is required by also consulting neighbouring properties in line with the ExA advice and to ensure the nearest residents had the opportunity to input. The scope and methodology informing the consultation exercise and a full list of all parties who were consulted on the proposed changes is set out in the Consultation Report, see **Application Document 9.76.4 (A) Consultation Report**.
- 5.2.5 To support meaningful consultation, the Applicant provided a Consultation Document **[CR1-003]** on the project website. The link to this website was provided in the letters and emails issued to section 42 consultees and residents, but was also available openly to anyone visiting the website. The Consultation Document **[CR1-003]** included a summary description of all the proposed changes and whether they are likely to result in any significant environmental impacts (see Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5**) as well as relevant useful information in relation to the Change Request process.

Other Engagement

- 5.2.6 In addition to the formal engagement above, National Grid also held informal meetings on the changes with key stakeholders.
- 5.2.7 National Grid briefed Dover District Council, Thanet District Council and Kent County Council on the proposed changes in their respective areas during a Teams meeting on

9 September 2025. National Grid also briefed East Suffolk Council and Suffolk County Council on 11 September 2025 on the proposed changes in their respective areas and provided a further update on 9 October 2025.

- 5.2.8 National Grid also engaged with Historic England and the County Archaeologist for Suffolk in July 2025 on the proposed change 3. Further engagement was undertaken with both of those parties in October 2025 following the results of geophysical and trial trenching including discussions about the proposed change options available to reduce environmental impacts associated with Change 3 and potential further changes once further information about the historical feature were available .
- 5.2.9 In relation to Change 4 – Benhall Railway Bridge, National Grid has also been in discussions with the Local Highway Authority (SCC) on this topic. This includes a detailed discussion on the options for access over the bridge discussed in a face to face meeting on 5 August 2025 and informal discussions held in September 2025 on the proposed change to the application. National Grid has also been liaising with both SCC and Network Rail to develop a scope of works to investigate the condition of the bridge and agree what is required to access the area around the bridge, particularly on Network Rail land. This process is being carried out in parallel with the DCO application and is not expected to feed into it. National Grid also contacted East Suffolk Council to discuss the housing application adjacent to the bridge.
- 5.2.10 National Grid has engaged with landowners and affected parties affected by areas of additional land, with further discussions in September/ October 2025 on the nature of the changes, potential additional survey work, the housing application at Benhall Railway Bridge and the hedge south of the B1119.

Consultation Feedback

- 5.2.11 In total, 232 responses were received to the non-statutory consultation. All comments were reviewed and taken into account when developing the final proposals for this Change Request as detailed in this report and in the Consultation Report.
- 5.2.12 The Consultation Report includes the rationale for the scope of the consultation exercise that has been undertaken and appends copies of the consultation responses received by National Grid on the proposed changes to the Proposed Project.

6. Compliance with the Infrastructure Planning (Compulsory Acquisition Powers) Regulations 2010

6.1 Overview

- 6.1.1 National Grid confirms that additional compulsory acquisition and/or temporary use powers are sought (in relation to land outside of the current Order Limits) for proposed changes 1, 3, 4 and 5. Regulations 5 to 19 of the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) are therefore engaged.
- 6.1.2 National Grid has submitted with this Change Request the required documents as prescribed by regulation 5 of the CA Regulations, namely:
- a book of reference or (where a book of reference has been submitted) a supplement to that book (see **Application Document 4.3 (C) (version 2, change request) Supplemental Book of Reference** submitted with this Change Request);
 - a land plan identifying the land required as additional land, or affected by the proposed provision (see **Application Document 2.3 (C) (version 2, change request) Land Plans Part 1 of 2 and Part 2 of 2** submitted with this Change Request); and
 - a statement of reasons as to why the additional land is required and a statement to indicate how an order that contains the authorisation of the compulsory acquisition of the additional land is proposed to be funded ((see **Application Document 4.2 (E) (version 2, change request) Statement of Reasons** submitted with this Change Request) and **Application Document 4.1 (A) (version 2, change request) Funding Statement** submitted with this Change Request).
- 6.1.3 National Grid has consulted with all parties with an interest in the additional land to be included in the Order Limits and those affected where class of rights changes have taken place over land which was previously included in the Order Limits in advance of submission of the Change Request. The majority of interested parties had previously been engaged with during previous consultation on the Proposed Project as they are affected persons in relation to land already included in the current Order Limits. However, the formal notification and consultation period under the CA Regulations takes place after submission of the Change Request with a proposed programme presented in Table 6.1.
- 6.1.4 In response to the ExA's Rule 9 letter **[PD-011]** and in line with CA Regulations, National Grid will publish any required notices following submission of the Change Request. It is noted that the ExA's Rule 8 letter published on 10 November 2025 **[PD-013]** also states that: *'The ExA wants to ensure that all those who may be affected by, or may wish to comment on, the proposed changes are notified about the change and informed as to how they can submit a representation. The ExA therefore requests that the applicant ensures that the proposed changes are widely publicised.'* In line with this

request the Applicant intends to publicise the Change Request widely when publicising following submission, rather than only consulting affected parties. This has been taken into account in the timescales set out in Table 6.1.

- 6.1.5 In line with the Guidance, National Grid has provided in Table 6.1 a description of how it considers the procedures in regulations 5-19 of the CA Regulations can be accommodated within the examination timetable as set by the ExA in their Rule 8 letter **[PD-013]**. In doing so, the Applicant recognises that the ExA states in the Rule 9 letter that: *'The ExA is satisfied that if we decide to accept the proposed changes, there is time to accommodate the opportunity for all IPs to make representations on the changed application during the examination, in line with the principles of fairness and reasonableness.'*
- 6.1.6 The Rule 9 letter **[PD-011]** also states that submission of proposed changes later than November 2025 could compromise the ExA's ability to examine them and strongly encourages submission of all proposed changes no later than deadline 1A (26 November 2025). The Applicant has consequently submitted the changes at this deadline.
- 6.1.7 The CA Regulations stipulate a period of 28 days from the day after the day it receives details of the proposed changes for the ExA to decide whether or not to accept the changes, which when submitting to the timescale set by the ExA sets a deadline of 25 December. However, National Grid is aware that in reality the decision is often made much quicker than this. For example, on Gate Burton Energy Park the Applicant submitted a Change Request for four changes on 3 October 2023, with all changes accepted on 6 October 2023; and on Yorkshire Green the Applicant submitted a Change Request for three changes on 11 July 2023, with the changes being accepted on 13 July 2023. Therefore, National Grid has suggested an alternative deadline of 12 December for the changes to be accepted, although the decision of when to take the decision is of course entirely that of the ExA. A decision by 12 December would give clarity on the changes prior to issue of first written questions, which is considered beneficial for all parties, as well as aligning with the approach set out in the Rule 9 letter **[PD-011]**, which suggested that changes would be considered in the first written questions.
- 6.1.8 The programme presented in Table 6.1 aligns with the indicative programme presented in the Change Notification **[AS-138]**. Dates marked with a * are final dates and delivery earlier than these dates may be possible and could speed up the process.

Table 6.11 Programme of Procedures in CA Regulations in the Context of the Examination

Procedure	Date	Relevant CA Regulation	Document
Notification of Change	16 Sept 25	N/A (Guidance)	AS-138
Non -statutory consultation	7 Oct 25- 7 Nov 25	N/A (Guidance)	Change Request documents
Change Request Submission	26 Nov 25	5	See documents as submitted with this Change Request.
Change Request Accepted	12 Dec 25	6	N/A

Procedure	Date	Relevant CA Regulation	Document
Notification and publication (two consecutive weeks for local newspapers)	W/c 8 and 15 Dec 25	7 and 8	N/A
Consultation period (28 days from day after last notice)	W/c 8 Dec 25-19 Jan 26	7 and 8	N/A
Change considered as part of the ExA's first written questions published on or before 17 Dec 25	17 Dec 25*	N/A	See ExA's Rule 9 and Rule 8 letter
Relevant representations on the changes to be submitted by close of consultation	19 Jan 26	10	N/A
Certificates of compliance to be submitted by National Grid (10 working days after deadline)*	2 Feb 26*	9	N/A
Initial assessment of issues arising (within 21 days of end of consultation)	9 Feb 26*	11	N/A
Timetable to examine changes including for written representations (timescale is Applicant's suggestion)	9 Feb 26	12 and 13	N/A
Notice of hearings by ExA	9 Feb 26	14, 15 and 16	N/A
Hearings (if required) suggest align with the week set aside for potential additional hearings in the Rule 8 letter but earlier is possible if preferred	w/c 18 Mar 26	14, 15 and 16	Rule 8 letter
Close of Examination	5 May 26	N/A	N/A

6.1.9 As demonstrated in Table 6.1 National Grid is confident that the Change Request can be considered within the examination timetable.

6.1.10 National Grid is requesting for a change in land for the following proposed changes which triggers the CA Regulations:

- Change 1: Change to access at the Hoverport (increase in area to the access to the hoverport)
- Change 3: Change to the Order Limits at Friston to provide flexibility in relation to heritage feature, Suffolk (increase in area)
- Change 5 - Increase in area for maintenance of a new hedge to south of B1119

- 6.1.11 Additionally, the Applicant notes that in respect of Change 4 (new land at Benhall Railway Bridge pertaining to ALLs) only temporary use powers are sought, rather than any powers of compulsory acquisition. Temporary use land powers are addressed in the relevant land documents, such as the Book of Reference and Land Plans. The Applicant has submitted as part of this Change Request the following documents, required under Regulation 5 of the CA Regulations.
- Supplemental Book of Reference (see **Application Document 4.3 (C) (version 2, change request) Book of Reference**)
 - Land Plans (see **Application Document 2.3 (C) (version 2, change request) Land Plans Part 1 of 2 and Part 2 of 2**)
 - Statement of Reasons (see **Application Document 4.2 (E) (version 2, change request) Statement of Reasons**)
 - Funding Statement (see **Application Document 4.1 (A) (version 2, change request) Funding Statement**)
 - Supplemental lands tracker which provides details on the status of negotiations about the additional land (see **Application Document 9.16 (A) (version 2, change request) Land Rights Tracker**).
- 6.1.12 Table 6.2 and Table 6.3 lists the new plots arising from the proposed changes in Suffolk and Kent respectively and the class of rights being sought. These plots relate either to new land not previously within the existing Order Limits or where existing plots have been amended to reflect a change in the class of right sought over that land.

Table 6.2 New plots arising from the proposed change in Suffolk and class of rights being sought

Plot number	Class of Right
1/74	Class 8
1/75	Class 8
1/76	Class 7
1/77	Class 7
1/78	Class 8
1/79	Class 7
1/80	Class 7
1/81	Class 7
1/82	Class 7
1/83	Class 8
1/84	Class 6
1/85	Class 8
1/86	Class 7
1/87	Class 6
1/88	Class 8

Plot number	Class of Right
1/89	Class 8
1/90	Class 5
1/91	Class 5
1/92	Class 5
1/93	Class 7
1/94	Class 7
1/95	Class 5
1/96	Class 5
1/97	Class 10
1/98	Class 8
1/99	Class 7
1/100	Class 7
2/100	Class 5
2/101	Class 5
2/102	Class 3
2/103	Class 5
2/104	Class 3
2/105	Class 8
2/106	Class 6
2/107	Class 8
2/108	Class 8
2/109	Class 3
2/110	Class 3
2/111	Class 3
2/112	Class 3
3/41	Class 3
3/42	Class 3
3/43	Class 6
3/44	Class 3
3/45	Class 6
3/46	Class 3
3/47	Class 6
3/48	Class 3
3/49	Class 3
3/50	Class 3

Plot number	Class of Right
3/51	Class 3
3/52	Class 3
3/53	Class 3
3/54	Class 3
3/55	Class 3
3/56	Class 5
3/57	Class 5
3/58	Class 5
3/59	Class 5
3/60	Class 5
3/61	Class 3
3/62	Class 3
3/63	Class 3
3/64	Class 5
7/1	Class 8
7/4	Class 8
7/13	Class 8
7/15	Class 8
7/16	Class 8
7/17	Class 8
7/21	Class 8
7/22	Class 8
7/23	Class 8
7/24	Class 8
7/25	Class 8
7/26	Class 8
7/27	Class 8
7/28	Class 8
7/29	Class 8
7/30	Class 8
7/31	Class 8

Table 6.3 New plots arising from the proposed change in Kent and class of rights being sought

Plot number	Class of Right
3/99	Class 3
3/100	Class 3
3/101	Class 3
3/102	Class 3
3/103	Class 3
3/104	Class 3
3/105	Class 3
3/106	Class 3
3/107	Class 3
3/108	Class 3
3/109	Class 3
3/110	Class 8
3/111	Class 5
3/112	Class 5
5/26	Class 8
5/27	Class 3
5/28	Class 8
5/29	Class 8
5/30	Class 8
5/31	Class 8
5/32	Class 5
5/33	Class 5
5/34	Class 5
5/35	Class 3
5/36	Class 8
5/37	Class 8
5/38	Class 8
5/39	Class 8
5/40	Class 8
5/41	Class 8
5/42	Class 8
5/43	Class 8
5/44	Class 8
5/45	Class 5

Plot number	Class of Right
5/46	Class 3
5/47	Class 5
5/48	Class 5

7. Conclusion

7.1 Overview

- 7.1.1 This report explains National Grid's proposed changes to the DCO application including the rationale and need for making the proposed changes. It also confirms any changes from the information set out in the Notification Letter **[AS-138]** and provides details to support the change request. The Applicant requests that the ExA considers and accepts the proposed changes for inclusion into the Examination of the Application.
- 7.1.2 Further, this report (and the Change Request: Addendum to Volume 6 Environmental Statement as shown in **Application Document 9.76.5**) explain that National Grid has considered and reported on the position regarding and new or different likely significant environmental effects as a result of the proposed changes in Section 3 of this document. The assessment concludes that there would be no new or materially different likely significant effects on the environment from the proposed changes, either alone or in combination.
- 7.1.3 National Grid has outlined in this report how, in order to safeguard the interests of and to inform those potentially impacted by the proposed changes, National Grid undertook targeted consultation on the proposed changes (see section 5) which is further reported in the Consultation Report, see **Application Document 9.76.4 (A) Consultation Report**. This consultation was undertaken in line with Guidance on making changes after submission of the application and advice from the Examining Authority on the consultation required.
- 7.1.4 Where feedback was received, the Consultation Report, see **Application Document 9.76.4 (A) Consultation Report**, provides details of how National Grid has taken relevant responses into account in finalising the change request. Due regard has been had for consultation responses received and amendments have been made to the proposed changes as a direct result of consultation undertaken.
- 7.1.5 Section 6 of this report details how National Grid has submitted, in support of the Change Request, the information prescribed in regulation 5 of the CA Regulations. National Grid has also provided a detailed description of how it considers the procedures in regulations 6-19 of the CA Regulations can be accommodated within the examination timetable as set by the ExA in their Rule 8 letter **[PD-013]** dated 10 November 2025.
- 7.1.6 National Grid, therefore requests that the ExA accepts the Change Request comprising the five proposed changes to the Proposed Project, on the basis of the supporting information set out in this change request and the documentation prepared by National Grid to support it. It is the Applicant's view that these changes will improve the application, reduce environmental impacts (albeit not materially) and respond to feedback received from landowners and key stakeholders.

References

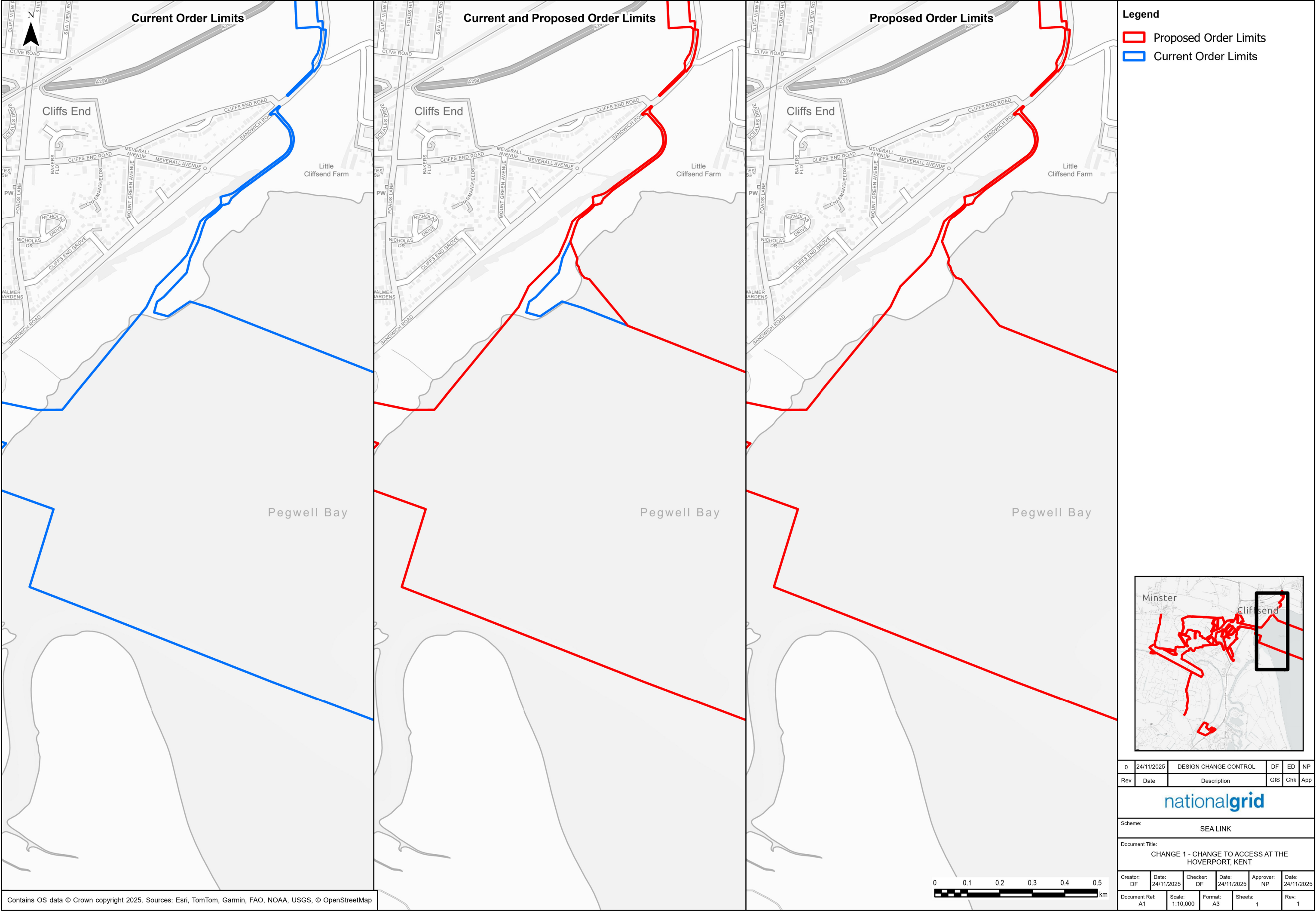
Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination - GOV.UK

Infrastructure Planning (Compulsory Acquisition) Regulations 2010. The Stationary Office Limited (2010)

Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land. Department for Communities and Local Government (2013).

Planning Act 2008 (as amended). The Stationary Office Limited (2008)

Appendix A : Change 1 Hoverport, Kent Proposed Change Drawing



Appendix B : Change 2 Friston substation, Suffolk Proposed Change Drawing

Appendix C : Change to the Order Limits in the cable corridor south east of Friston



Legend

Proposed Order Limits

Current Order Limits

0	25/11/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App

nationalgrid

Scheme:SEA LINK

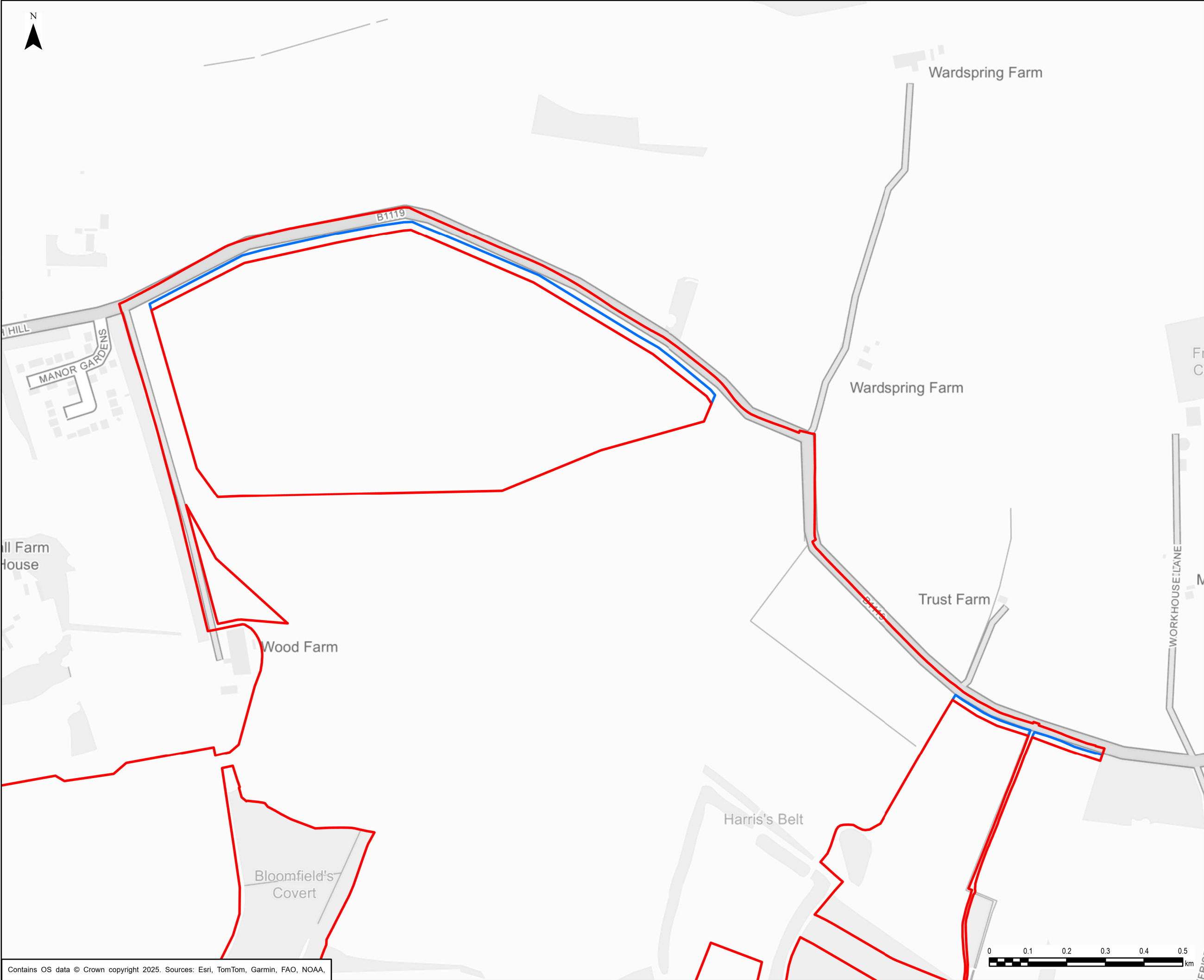
Document Title:CHANGE 3 - CHANGE TO THE ORDER LIMITS
AT FRISTON TO PROVIDE FLEXIBILITY IN RELATION
TO HERITAGE FEATURE, SUFFOLK

Creator: DF	Date: 25/11/2025	Checker: DF	Date: 25/11/2025	Approver: NP	Date: 25/11/2025
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Appendix D : Change 4 Benhall Railway Bridge, Suffolk Proposed Change Drawing

Appendix E : Change 5 Increase in area for maintenance of a new hedge to south of B119, Suffolk Proposed Change Drawing



Legend

Proposed Order Limits

Current Order Limits

0	24/11/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App
nationalgrid					
Scheme: SEA LINK					
Document Title: CHANGE 5 - INCREASE IN AREA FOR MAINTENANCE OF A NEW HEDGE SOUTH OF B1119					
Creator: DF	Date: 24/11/2025	Checker: DF	Date: 24/11/2025	Approver: NP	Date: 24/11/2025
Document Ref: A5	Scale: 1:9,058	Format: A3	Sheets: 1	Rev: 1	

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