



**The Great Grid Upgrade**

Sea Link

# Sea Link

## Volume 9: Examination Submissions

Document 9.35.5 Applicant's Comments on Local Impact Report from Dover District Council

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# 1. About this Document

## 1.1 Purpose of this Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant) comments on the Local Impact Report (LIR) submitted by Dover District Council (DDC) in response to the application for development consent for the Sea Link Project.

## 1.2 Project Overview

- 1.2.1 National Grid Electricity Transmission plc (hereafter referred to as 'the Applicant') has submitted an application for development consent for the Sea Link Project, which proposes to reinforce the electricity transmission network between Suffolk and Kent. The Project comprises the construction and operation of a new high-voltage electricity transmission connection, including underground cables, converter stations, grid supply point substations, and associated infrastructure. It also includes the removal of sections of existing infrastructure and various ancillary works.
- 1.2.2 The application for development consent was accepted for Examination on 23 April 2025.
- 1.2.3 A full description of the Project is provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.

## 1.3 Structure of the Document

- 1.3.1 The **Local Impact Report (LIR) for Dover District Council [REP1-127]** has been structured into four chapters. The Applicant has reviewed and provided comments on each chapter, as presented in Table 2.1. Comments are provided against the paragraph numbers used in the LIR, with paragraphs grouped where appropriate for clarity and efficiency.

## 2. Applicant's Comments on the Dover District Council Local Impact Report

### 2.1 Introduction

2.1.1 This section provides the Applicant's comments on all chapters of the DDC's LIR.

### 2.2 Comments Table

**Table 2.1 Applicant's Comments**

Reference	Matter	Point Raised	Applicant's Comments
<b>Chapter 1 Introduction</b>			
1.2 Pre-application process and consultation			
1.2.1	Engagement	DDC have engaged constructively with NGET throughout the development of the project via a Planning Performance Agreement and have fully responded to previous consultation as part of the formal pre-application consultation process. NGET has made positive efforts throughout the process to endeavour to address any concerns raised by DDC and this has assisted with reducing the residual impacts that would need to be addressed in	The Applicant acknowledges the constructive approach that DDC has taken to the Proposed Project and looks forward to working positively with them during the Examination and beyond.



Reference	Matter	Point Raised	Applicant's Comments
		order to make the proposal acceptable in planning terms. Where any issues are outstanding, (Government, 2024) they are addressed in this report. This position is further clarified in the agreed Statement of Common Ground (SoCG) and principal areas of disagreement summary statement (PADSS) previously submitted. Both the SoCG and PADSS are intended to be updated during the course of the examination as matters are discussed in hearings and between DDC and NGET, with ongoing meetings taking place between DDC and NGET outside the examination.	
1.3 Statement of Common Ground			
1.3.1	SoCG	The extent of agreement reached between the DDC and NGET on the impacts of the proposed development is set out in the Statement of Common Ground (SoCG) submitted by NGET. Since the submission of this, NGET has hosted further thematic meetings to inform matters which were not agreed or where further clarification was sought. An updated SoCG will be submitted later in the Examination. DDC have sought in this LIR to constructively identify where further information and proposals are needed, to ensure that the adverse local impacts are adequately mitigated. DDC will continue to engage with NGET during the Examination process to update and revise the SoCG accordingly.	The Applicant submitted <b>Application Document 7.4.6 Draft Statement of Common Ground Dover District Council [REP1-078]</b> at Deadline 1. Discussions are ongoing with DDC, and the Applicant intends to submit an updated version of the Statement of Common Ground with DDC at Deadline 3.

Reference	Matter	Point Raised	Applicant's Comments
<b>Chapter 2 Site and Proposals</b>			
2.2 Details of the Proposal			
2.2.3	Agree details and descriptions	To avoid repetition DDC agree and accept the project details and descriptions identified by NGET in the submission and as confirmed and accepted in the SoCG submitted by NGET.	The Applicant notes and agrees with this approach.
2.3 Relevant Development Plan Policies			
2.3.3	Policy compliance	DDC concur with the submitted assessments of the proposed development against the relevant adopted local planning policies as set out in the Planning Statement, which also assesses the proposals against national policy statements and other local policies. DDC would be of the view that such a development would be justified and would incorporate suitable mitigation measures that would overcome impacts to an acceptable level, some of which, particularly in relation to ecology and biodiversity, are still under discussion. Consequently, the proposed development could be considered in broad compliance with these policies.	The Applicant welcomes DDC's assessment that the proposed development could be considered in broad compliance with national and local planning policy. The Applicant considers that the mitigation measures that are proposed as part of the Proposed Project are sufficient but will continue to engage with DDC over this issue.
<b>Chapter 3 Likely Effects of the Proposed Development</b>			
3.0.1	Environmental principles	DDC wish to identify their support for the environmental principles of renewable energy and sustainable sources of energy	The Applicant notes and welcomes DDC's position on these matters.

Reference	Matter	Point Raised	Applicant's Comments
		generation as a whole as identified in the Dover District Local Plan to 2040 (Dover District Council, 2024) and in line with National Guidance including the National Planning Policy Framework (NPPF) 2024 (Ministry of Housing, Communities and Local Government, 2024) and national policy statements.	
3.0.2	Economy	DDC also recognise and support the creation of jobs and the wider benefits to the local economy, including additional spending and the benefits this will have on local businesses.	
3.1 Landscape and Visual Impacts			
3.1.1	Viewpoints	In terms of the submitted onshore Landscape and Visual Impact Assessment (LVIA), associated photomontages and identified viewpoints, DDC has had the opportunity to input into the selection of viewpoints as part of the pre-application engagement undertaken to date and is satisfied with the viewpoints selected.	The Applicant notes and welcomes DDC's position on these matters.
3.1.2	Richborough Fort	In particular, a viewpoint from Richborough Fort has been included which, being at an elevated position, affords direct views towards the proposed development. Due to the positioning of pylons and the route of the overhead line, the converter station and other buildings would be visible from this and other viewpoints in the District and would not be screened by planting or landscaping. DDC is therefore interested to review the design of the converter station building both from a	The design of the proposed Minster Converter Station and Minster Substation would be further developed within the detailed design stage. For the latest information on the design, the Design Approach Document should be referred to <b>(Application Document 7.11.2 Design Approach Document - Kent [REP1A-031])</b> . Additionally, the Applicant has submitted illustrative visualisations including from Viewpoint 8 (viewing platform at Richborough Roman Fort) in <b>Application Document 9.14</b>



Reference	Matter	Point Raised	Applicant's Comments
		landscape and visual impact perspective, but also in relation to impact on heritage assets and tourism as this could affect the visitor experience at the Richborough Roman site, albeit DDC acknowledges the separation distance between this and the proposals.	<p><b>Suffolk and Kent Illustrative Visualisations [REP1-296]</b>. The illustrative visualisations have been prepared to illustrate how a more realistic and detailed model of the Kent Onshore Scheme would look rather than the block photomontages which showed the maximum parameters for the Kent Onshore Scheme.</p> <p>For further details on the visual impact from Richborough Fort, <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]</b> should be referred to.</p> <p>For further details on effects on Richborough Fort from a cultural heritage perspective, <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]</b> should be referred to.</p> <p>For further details on effects to tourism at Richborough Fort, <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]</b> should be referred to.</p>
3.2 Ecology and Biodiversity			
3.2.1	Long-term management	Thematic meetings have been held between NGET and the Kent Authorities prior to and since the submission of the application and DDC has had the opportunity to seek further clarification from NGET on surveys and	The Applicant will continue to engage with DDC over remaining matters requiring clarification.

Reference	Matter	Point Raised	Applicant's Comments
		assessments carried out, as well as mitigation proposals. Following review of the outline documents, some concerns were raised in DDC's PADSS where further clarification has been sought in relation to biodiversity net gain and the responsibility and funding for the monitoring of this, noting an area for environmental mitigation is proposed within DDC's district, to the northwest of Discovery Park, Sandwich. Further detail on the long-term management of mitigation has also been sought and whilst it is expected a number of the queries raised would be addressed in more detail in the requirements of the DCO, DDC will continue to discuss this with NGET during the examination period to seek to resolve these matters.	
3.3 Cultural Heritage			
3.3.1	Heritage assets	In respect of archaeology and cultural heritage within DDC, the ES chapter has identified the relevant designated heritage assets within a 500m buffer of the onshore boundary on which the proposal would have an impact. Linked to this, NGET has included a viewpoint in the LVIA at Richborough Castle (managed by English Heritage) in line with the request from DDC and discussions through thematic meetings between the council and NGET. A wider 2km buffer has been applied in the assessment of potential impact settings on	The Applicant notes and welcomes DDC's position on these matters.

Reference	Matter	Point Raised	Applicant's Comments
		designated heritage assets. In relation to the three listed buildings identified in DDC boundary (Castle Farm, King's End Farmhouse and Richborough Farm – all grade II Listed), DDC agrees with the conclusions reached, considering that these buildings are seen in the context of modern agricultural buildings and that the proposals would appear more distant, be seen alongside similar development and would blend into the landscape with the development at Minster further north, such that there would be limited potential for the development to result in significant impacts to the setting of these assets. The Council also agrees with the conclusions reached in respect of non-designated heritage assets within the district and would defer to Historic England in relation to scheduled monuments.	
3.3.2	Archaeology	In respect of archaeology, KCC Archaeology and Historic England are the relevant parties to respond on these matters and DDC would support their views on these aspects.	The Applicant notes this comment.
3.4 Water Environment			
3.4.1	Ground conditions, flood risk and land-use	In terms of overall ground conditions, flood risk and land-use DDC have no outstanding concerns in relation to these matters. DDC are in agreement with the approach to assessment, data gathering and the methodology identified. DDC are satisfied to refer to the Environment Agency, KCC Flood and Water Management (as lead local flood	The Applicant notes and welcomes DDC's position on these matters.

Reference	Matter	Point Raised	Applicant's Comments
		authority) and Thanet District Council in respect of any additional requirements and would agree with any further recommendations.	
3.4.2	Ground contamination	In terms of potential ground contamination, it is understood that investigation works indicate trenchless crossing beneath the saltmarsh is possible and that if this position changes at a later date, permission would be needed to amend the proposals, where further scrutiny would take place, which the council is supportive of.	The Applicant confirms this understanding to be correct
3.5 Traffic and Transport			
3.5.1	Highways	DDC can confirm that all highways and local transport considerations shall be addressed by Kent Highways and Transportation within the Kent County Council (KCC) representations and LIR. In respect of all highway matters (including access points and construction traffic) DDC would seek the views of Kent Highways and Transportation and therefore raise no comments on these matters but would support their comments within the Principal Areas of Disagreement Summary Statement (PADSS) regarding access to the development via Marsh Farm Road and Richborough Road/Whitehouse Drove, which are narrow, winding roads, generally national speed limit, with few passing places, crossing public footpaths and the Sandwich to Minster railway line and utilised by residential traffic, farm	The Applicant has responded to KCC's Relevant Representation in <b>Application Document 9.34.5 Applicant's Responses to Selected Relevant Representation Responses [REP1-115]</b> and the KCC PADSS (Table 1.1). The traffic and transport response within Table 1.1 of the KCC PADSS addresses this comment on the proposed usage of Marsh Farm Road and Richborough Road/ Whitehouse Drove.

Reference	Matter	Point Raised	Applicant's Comments
		vehicles and tourists including those visiting Richborough Roman Fort and amphitheatre.	
3.6 Air Quality			
3.6.1	Air Quality	In respect of air quality DDC have discussed this topic with the applicant's consultants and can confirm there are no major air quality concerns that would impact residential receptors in the Dover District. Neither is it likely that National air quality objectives would be breached because of construction traffic. DDC have no further air quality concerns.	The Applicant welcomes DDC's view on air quality matters.
3.7 Noise and Vibration			
3.7.1	Piling noise	In respect of noise, DDC note that in respect of piling, NGET state that " <i>The Proposed Project is required urgently to provide connections to developments required to meet net zero targets. Limiting hours for percussive piling could provide a constraint on the construction period, elongating construction and increasing the risk that timescales will not be met</i> ". DDC has raised concerns regarding the impact on residential amenity within the PADSS and suggests that the start time of piling works should be amended from 07:00 to 08:00. DDC considers this request to be reasonable and cannot see that any argument this will cause a critical effect on the construction process would be justified.	<p>The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted. The Applicant is therefore not proposing to amend the working hours as per DDC's request.</p> <p>The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 (National Energy System Operator (NESO), 2024)a report as being critical for the achievement of the Clean</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</b>, <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-103]</b>, and <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b>.</p> <p>Notwithstanding this, it is not anticipated that all types of construction activity will take place on every Sunday or Bank Holiday. There will be restrictions on the type of activity that can occur on these days. The restrictions include limiting HGV and percussive piling activities. Details relating to the proposed construction working hours and any associated restrictions are secured by Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order [AS-087]</b> superseded by <b>[REP1-036]</b> and further set out in <b>Application Document 6.2.1.4 Part 1 Chapter 4</b></p>



Reference	Matter	Point Raised	Applicant's Comments
			<p><b>Description of the Proposed Project [AS-093].</b></p> <p>Also of note is that the principle of working on Sundays and bank holidays has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p>
3.7.2	Use of Marsh Farm Road, Richborough Road and Whitehouse Drove	Noting the concerns raised by KCC within their PADSS, DDC raised the matter of the use of Marsh Farm Road, Richborough Road and Whitehouse Drove with NGET's consultants at a thematic meeting. It is understood the use of these routes would likely be limited in nature and constitute irregular passing traffic only, however further detail on the use and traffic management of this route would be of assistance and if this was to be more frequent and increased in nature then DDC may have concerns in respect of residential amenity.	<p>With regard to the use of Marsh Farm Road, Richborough Road and Whitehouse Drove, these are considered within <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]</b>.</p> <p>The only construction vehicles to pass through these roads will be those travelling via Marsh Farm Road (access K-BM04) to undertake temporary diversion works to the overhead lines (OHL), including constructing a temporary structure, realigning conductors and building scaffold protection towers.</p> <p>Vegetation clearance and survey works will also be undertaken at this access. Construction traffic is only forecast to use this (Marsh Farm Road) route for a period of six weeks, with a maximum</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>of 29 daily vehicles including seven HGVs. This represents 0.4% of total construction vehicle trips associated with the Kent Onshore Scheme. As shown on <b>Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]</b>, no construction vehicles are expected to travel through Minster during the peak construction phase. As shown on the HGV Routing Plan within <b>Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]</b>, the route through Minster does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts through Minster or on these local roads.</p>
3.7.3	Operational concerns	<p>Overall, DDC considers the project will mainly affect residents within Thanet District Council's area, with the construction processes possibly having a limited effect on the DDC area. The submitted reports refer to a section 61 application, which DDC encourages, and this will allow DDC to place a greater control on individual works that may affect the DDC area. Based on the information provided, DDC's concerns relate to piling works for the replacement pylons and construction routing for the area to the rear of Richborough Energy Park; such that the Council has no significant concerns on the development, but some concerns on the operational elements.</p>	<p>The Applicant notes this comment. Section 61 applications for prior consent will be considered, where appropriate, through consultation with DDC and Thanet District Council (TDC).</p>

Reference	Matter	Point Raised	Applicant's Comments
3.8 Socio-economics, Recreation and Tourism			
3.8.3	Impact on tourism and recreation	DDC consider that the potential impacts on tourism and recreation of the proposed development relate only to the onshore and landfall construction phases of the development. DDC consider the proposals will have a neutral impact on tourism and recreation in the DDC administrative area. The sub-station works and building, following landscape mitigation measures will also be likely to have a long-term neutral impact.	The Applicant welcomes DDC's view on potential impacts on tourism and recreation.
3.8.4	Mitigation measures	The location of the cable route through the Country Park and NNR is accepted as a necessary requirement if the development is found to be acceptable in all other regards. The mitigation measures to minimise the construction aspects of the proposal have addressed as far as practicable the short term impacts on the use of these recreational areas and seek to contain the construction impacts to defined areas. DDC agree with the mitigation measures identified in the submission and consider that suitable measures have been incorporated into the mitigation proposals, although the minimisation of the timescale of the construction phases of development and working outside of peak holiday season could minimise the impact on tourism and recreation further.	The Applicant welcomes DDC's comments regarding the suitability of mitigation measures to minimise construction aspects as far as practicable on recreation areas cited. As set out above, the Applicant wishes to retain the flexibility to carry out works within the proposed programme.

Reference	Matter	Point Raised	Applicant's Comments
3.8.5	Golf Open Championships	DDC would like to highlight that the Golf Open Championships has previously been held at Royal St George's, most recently in 2021. Tournament venues have been announced up to July 2027, however it is not known at this stage if or when Royal St Georges may next host the competition. Whilst the event takes place over a week, it results in a substantial number of visitors to the district and the proposed traffic management will be important in avoiding conflict between the construction of the development and this event if the two occur at the same time.	The Applicant notes this comment. Details relating to proposed traffic management are set out within <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent [APP-338]</b> . The peak period of construction in terms of total annual forecast construction traffic movements for the Kent Onshore Scheme is expected to occur in 2030 (see <b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</b> ), which would therefore not overlap with the Golf Open Championships in 2027.
3.9 Proposed articles and requirements within the draft Order (DCO)			
3.9.1	Further discussions	The DCO contains in most part appropriate provisions for the control and management of the proposed development. DDC is largely in agreement with the wording of the proposed requirements in the Draft DCO but would welcome further discussion on any specific matters of concern from the Examining Authority or other relevant parties.	The Applicant welcomes DDC's views on <b>Application Document 3.1 draft Development Consent Order [REP1-036]</b> .
3.9.2	Matters expected to be discharged by DDC, Thanet District Council, Kent County Council	It would be of assistance to DDC for further clarification of those matters that are expected to be discharged by DDC, Thanet District Council, Kent County Council or other relevant authority or where joint applications or discharges are required; perhaps this detail could be included within the document.	The definition of 'discharging authority' is deliberately drafted to not name specific authorities or bodies given the different geographies and authorities involved in the Proposed Project. It is not the usual approach to name specific bodies in the draft DCO and such an approach is well-precedented by other development consent orders.

Reference	Matter	Point Raised	Applicant's Comments
			<p>However, the Applicant recognises that certainty is required by all parties over which bodies are defined as a discharging authority. The Applicant will work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified.</p>
3.10.1	Changes to draft DCO	<p>Changes to the draft DCO have been submitted and it is understood this will be a live document, updated as the proposed development progresses throughout the Examination. Schedule 3 sets out requirements for the development, including time limits for the commencement and submission of detailed plans, schemes and/or strategies relating to construction management, air quality, landscape and ecological management plan, construction noise and vibration, public rights of way management plan, soil management plan and numerous other plans. In relation to the converter station design, whilst documents would be submitted to the relevant planning authority in consultation with the relevant county council, it is not clear whether there would also be consultation with the neighbouring local authority. In this case, the Kent substation would be located in Thanet District's boundary, however, would clearly be visible from within the Dover District and the ability to comment on the final design would be appreciated, given the potential visual impacts and scale of the building.</p>	<p>Requirement 3 of <b>Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order (Clean) [CR1-027]</b> sets out a requirement that details of the layout, scale and external appearance should be submitted to the relevant planning authority, and the relevant planning authority may confirm, in consultation with the relevant county council, that the details are in general accordance with the Key Design Principles. As drafted, this does not currently include consultation with a neighbouring local authority. The Applicant considers that the provisions of Requirement 3 are clear and provides for sufficient oversight of the converter station design.</p> <p>The detailed Landscape and Environmental Management Plan is to be modified to satisfy the requirements of the HMMP template checklist (Habitat Management and Monitoring Plan Template (JP058)) and will provide details on the management and monitoring of habitats that are to be managed for the lifetime of the asset and monitored for 30 years as per BNG requirements, and details of the methodology for the reinstatement of habitats along the cable</p>

Reference	Matter	Point Raised	Applicant's Comments
		Whilst not a statutory requirement, a commitment has been made to achieve biodiversity net gain, however, there do not appear to be provisions to secure a monitoring fee for this. Could details of the frequency of monitoring and submission of reports on the findings of this be secured through the landscape and ecological management plan.	<p>route which are being undertaken outside of national grids landholdings. Further discussions with relevant LPAs will be undertaken throughout the Proposed Projects lifecycle to agree on monitoring requirements, legal agreements and monitoring fees these will be detailed within the detailed Landscape and Environmental Management Plan.</p> <p>The matter on BNG Monitoring is the subject of ongoing discussions between the Applicant and DDC and an update provided in the next iteration of <b>7.4.6 (B) Draft Statement of Common Ground Dover District Council [REP1-078]</b>.</p>

## Chapter 4 Conclusions

4.1.1 (Dover District Council, 2024) (National Energy System Operator (NESO), 2024)	Further engagement	DDC will continue to engage positively with National Grid Electricity Transmission and the Examining Authority and welcomes the opportunity for further engagement on the content of this Local Impact Report as the examination advances.	The Applicant welcomes continued positive engagement with DDC.
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