The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.34.3: Applicant's Response to Relevant Representations from Affected Landowners

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~~1.~~4. Detailed Responses to Relevant Representations of Landowners

~~1.1.1~~4.1.1 The Tables below comprise the Applicant's response to Relevant Representations of Affected Landowners.

~~Table 4.1~~ Table 4.1 Applicant's Response to the Relevant Representation of Manston Thorne Limited

Reference	Summary of relevant representation	Applicant's Response
4.1.1	Dear Sir/Madam, I am writing on behalf of Manston Thorne Limited to register as an interested party and to submit. Upon review of the land and works plans submitted with the DCO application, it appears that the solar farm's connection apparatus and point of connection to the distribution network will be impacted if the DCO is made and implemented. Plan 2 provides the easement route for the section of cable that would be affected. Unsurprisingly, the affected cable is essential to the operation of the solar farm. Although the cable is adopted by UKPN, the land rights for its location benefit Manston Thorne Limited, which is the registered proprietor of a legal easement in the associated cable route. Category 2 Owner As summarised above, Manston Thorne Limited is a Category 2 owner of land within the proposed Order Limits and is an interested party automatically by virtue of s.102(aa) of the Planning Act 2008.	The Applicant welcomes Quintas Energy/Manston Thorne's engagement with the Proposed Project. Unfortunately, there were no plans attached to the representation; however, the Applicant has made efforts to contact Quintas Energy/Manston Thorne directly to obtain these plans. Quintas Energy/Manston Thorne have since confirmed that the cable has been adopted by UKPN and the Applicant is therefore satisfied it will be covered by the Protective Provisions contained within **schedule 15** of the **draft DCO** [**AS-087**].
4.1.2	I can confirm that Manston Thorne Limited wishes to remain an interested party and to participate in the examination.	Comments noted.
4.1.3	The Category 2 interests owned by Manston Thorne Limited are set out in the Book of Reference accompanying the DCO application as follows: • Plot Number 3/52 – Class 3: Compulsory Acquisition of Rights – Underground Cable System • Plot Number 3/53 – Class 3: Compulsory Acquisition of Rights – Underground Cable System • Plot Number 3/80 – Class 5: Compulsory Acquisition of Rights – Access However, these plot numbers are not identified with the draft DCO and clarification is therefore required as to whether or not the proposed interests are intended to be acquired, possessed or interfered with.	The Applicant confirms Quintas Energy/Manston Thorne is listed as a Category 2 interest in plots 3/53, 3/80 in the **Land Plans [PDA-005/PDA-006].** The Applicant can confirm that the intention is to take the Rights listed against these plots to install HVDC cables and diverted HVAC UKPN cables through plot 3/52 and plot 3/53. Plot 3/80 will be retained as a right of access to the cables during construction and operation. The Applicant is working with UKPN on the potential diversion of their cables including any works that could impact on your connection, these works will be developed to minimise impacts on UKPN and their customers. However, the full details of the diversion works will not be confirmed until detailed design has developed post consent. The Applicant will continue to engage with Quintas Energy/Manston Thorne.
4.1.4	Relevant Representations The DCO application includes powers that would enable the undertaker to acquire our client's land interests. Although protective provisions are proposed that would benefit UKPN's interests in the apparatus located in that land, no protection is provided to our client even though its generation assets would be affected by the interference to the connection assets. Schedule 15 of the draft DCO contains protective provisions benefitting UKPN and its interests in the cable itself (i.e. the apparatus). Paragraph 5(1) therein prevents apparatus being removed and the rights of a statutory undertaker to maintain that apparatus in land to be acquired, until alternative apparatus has been constructed	The Applicant can confirm that protective provisions for the benefit of Statutory Undertakers is included in **Application Document 3.1 draft Development Consent Order [APP-007], superseded by [AS-087]** at Schedule 15, Part 1 for the protection for electricity, gas, water and sewerage Undertakers. The Applicant can, where there are losses as a direct result which cannot be mitigated, offer compensation in accordance with the Compensation Code. The Applicant will continue to engage directly with Quintas Energy/Manston Thorne and its appointed agent to adequately resolve the queries raised and facilitate the withdrawal of the objection.

Reference	Summary of relevant representation	Applicant's Response
	and is in operation to the reasonable satisfaction of the statutory undertaker in question. Paragraph 5(2) and subsequent provisions provide for a statutory undertaker to request the removal of apparatus from land purchased etc under the DCO and to undertake works. Paragraph 7 then provides for the repayment of the statutory undertakers reasonable and proper expenses associated with the inspection, removal, alteration or protection of apparatus. The affected apparatus is essential to the operation of the solar farm. While any alternative apparatus must to be UKPN's satisfaction, there is no equivalent mechanism enabling our client to be satisfied that such arrangements are satisfactory for the ongoing solar farm operations.	
4.1.5	We seek confirmation that: 1. the apparatus shown on the enclosed plans is within the Order Limits and will benefit from the protective provisions in schedule 15 2. The apparatus installed under the rights granted by the 1st August 2014 Deed of Easement will remain protected under the statutory Protective Provisions in the DCO. Accordingly, our client's primary concern is that disruption to the solar farm's grid connection could result in business losses due to the disruption of renewable electricity export. Any variation or impact to the existing connection must be indemnified appropriately. Solar infrastructure is now designated as critical national priority infrastructure under the UK Government's Energy National Policy, as of January 2024. As an exporter of renewable electricity and a contributor to the UK's Net Zero targets, we respectfully request that National Grid engage with Manston Thorne Limited, alongside UKPN, in the event of any proposed variation, diversion, or interruption to the existing apparatus as part of the Sea Link Project.	The Applicant will continue to engage directly with Quintas Energy/Manston Thorne to adequately resolve the queries raised.
4.1.6	Conclusion In principle, Manston Thorne Limited objects to the proposed DCO unless and until: • The extent to which our client's land interests are proposed to be acquired or interfered with is clarified; • It is confirmed that the existing apparatus within the Order Limits is protected under the relevant Protective Provisions; • Manston Thorne Limited will be consulted on any variations to connections and indemnified accordingly; • Manston Thorne Limited will be compensated for interference with and/or acquisition of its land rights; and • Business continuity concerns regarding the export of renewable energy are addressed and resolved.	The Applicant understands Manston Thornes position and will continue to engage with a view to confirming the extent of overlapping interests and land uses and the comments set out where appropriate to do so. As above the Applicant has confirmed that UKPN's apparatus is being protected by way of Protective Provisions. As the beneficiary of the easement securing the cable Manston Thorne will be consulted on any proposed variations to their connection. Under the Compensation Code Manston Thorne would be compensated for any evidenced losses arising as a result of the proposed project.
4.1.7	Accordingly, we are registering the interest of Manston Thorne Limited for full consideration during the DCO examination. We reserve our client's rights to make further comments during the examination of the application and to respond to any further information that may become available.	The Applicant notes and is aware of this.

~~Table 4.2~~ Table 4.2 Applicant's Response to the Relevant Representation of The National Trust

Reference	Summary of relevant representation	Applicant's Response
4.2.1	Nature Designations The National Trust's land holding at Pegwell Bay is mainly intertidal saltmarsh and, seaward side of this, intertidal mudflats. Any ecological impacts of the project will relate mainly to these habitats. The proposed marine route corridor at Pegwell Bay would cross a highly designated and sensitive part of the Kent Coast, much of which is owned and managed by conservation organisations like the National Trust and Kent Wildlife Trust. The designations at Pegwell Bay are set out below: - Sandwich and Pegwell Bay National Nature Reserve - Thanet Coast and Sandwich Bay Ramsar Site - Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest - Sandwich Bay Special Area of Conservation - Thanet Coast and Sandwich Bay Special Protection Area	Reference to concerns regarding impacts to intertidal habitats, particularly saltmarsh and mudflats, have been addressed in the RR regarding Horizontal Direct Drilling (HDD) impacts below. Nature designated sites at Pegwell Bay designated for marine ornithology have been assessed in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** superseded by **Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology.** Reference to impacts to birds which are qualifying features of these sites have been assessed in the RR regarding HDD impact below.
4.2.2	Horizontal Direct Drilling (HDD) impacts The National Trust does not object to the principle of the proposed offshore high voltage direct current link between Suffolk and Kent with onshore converter stations and connections back to the national electricity transmission system. We would support the developer's use of Horizontal Directional Drilling (HDD) construction methods at Pegwell Bay and would expect to see a firm commitment to undertake this form of engineering if this proves to be less detrimental than other alternatives. The entry point for the HDD is 470m west of the SAC/SPA/SSSI and Trust land. It is proposed to drill at 15-18m depth under the saltmarsh, and the exit point will be to the east of the saltmarsh in intertidal mudflat (Figure 6.4.4.2.4 Habitats present at, and location of, trenchless solution entry/exit points). However, the method statements do not rule out the need for trench installation if HDD proves to be difficult/impossible to use. If trenchless techniques are used, the Trust would have concerns due to the potential of the cumulative impacts on the Nature Reserve arising due to the possibility of the proliferation of cables installed previously for the Nemo link. Consequently, the Trust would want assurances that there will be nothing above ground on our land. It is noted that by far the longest section of cable on Trust land is some 1.5km in length and documents submitted to the examination refer to impacts upon benthic fauna and their capacity for rapid recovery following disturbance. However, there does not appear to be any reference in the paperwork to the disturbance effect on wintering, migratory and breeding birds from the cable laying operation across the 1.5km of intertidal mudflat. The significance of any impact will be dependent on the time of year the cable laying takes place with the period of September to April being the most significant, with implications for breeding Ringed Plover which will use the mudflats for feeding.	Open cut trenching in Pegwell Bay has been ruled out as an installation technique for the transition between the onshore and offshore scheme. The Proposed Project is based on using a trenchless technique, such as horizontal directional drilling (HDD), between the transition joint bay (TJB) and the offshore scheme. The TJB for the onshore scheme will be approximately 800 m inshore (as illustrated in **Application Document 2.5.2 Work Plans – Kent [APP-022**] and described in **Application Document: 6.2.1.4. Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**). The HDD exit point in the marine environment will be in the intertidal zone, at a location between 105 and 140 m seaward of the lower boundary of the saltmarsh, completely avoiding this habitat (the HDD will be between 15 and 20 m below ground level and therefore 15-20 m below the saltmarsh) so that no habitat loss of saltmarsh, or disturbance, to this sensitive habitat shall occur. The HDD exit point in the intertidal is within the mudflats where a number of short-term and small in extent construction activities will occur, as described in **Application Document 6.2.1.4 Part 1 Introduction. Chapter 4 Description of the Proposed Project [APP-045]**. Further information on landfall construction activities within Pegwell Bay is also provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note** submitted at Deadline 1. These activities, including construction of cofferdams around the exit pits of the trenchless crossing (HDD), drilling the HDD bores and duct installation, marine cable pull-in, marine cable and HDD duct end burial, access from the former hoverport and movement of construction plant and equipment around the temporary working area, will result in some temporary disturbance of the mudflat habitat, as described and assessed in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075]** superseded by **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology.** However, there will be no permanent habitat loss as the works at the HDD exit point will be reburied and any disturbance to the surface of the mudflats during landfall works will rapidly disappear with tidal and wave activity. Thus, all impacts on the Pegwell Bay saltmarsh habitat will be avoided and there will be no permanent impacts on the mudflat habitat. Therefore, there will be no loss of any habitat that is a qualifying feature of a protected site.

The construction activities at landfall which include trenchless activities (e.g., HDD), machinery (use of a cable lay barge (CLB) which might become beached on the mudflats, excavators (up to four) and other construction plant and vehicles e.g. tractors and argocats) and vessel movement in the intertidal area and shallow waters at landfall, will potentially result in disturbance to, and displacement of, waterbirds due to the noise and visual disturbance generated by the activities, as described and assessed in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** superseded by **Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology.** The noisiest operations (i.e. vibratory piling (up to 119 dB LAmax) required for installation of the cofferdams at the HDD exit pits), are predicted to fall below the 60 dB disturbance threshold beyond approximately 350 m, while key foraging and roosting sites for waterbirds (including wintering migratory birds such as, golden plover, cormorant, and sanderling), are at least 350–500 m from the works. Visual disturbance may extend up to 500 m, but this is limited by distance, the short duration of works, and the timing of construction, which is scheduled for Quarter 2 and 3 of 2027 when waterbird numbers are lower following the mid-winter peak. Given the distance from sensitive roosting areas, the restricted spatial and temporal extent of works, and the low numbers of birds likely to be affected at any one time, the overall effect on waterbirds (wintering and breeding) is predicted to be minor and temporary and not significant. Breeding bird surveys undertaken in 2023 and 2024 at both landfall locations did not record the presence of any breeding birds, notably waterbirds or seabirds, which could interact with the marine elements of the Offshore Scheme, including the intertidal area and both landfall locations. Further details on breeding bird assemblages relevant to the wider Proposed Project are set out in **Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.3.2.2.C Appendix 2.2.C Suffolk Breeding Birds 2023 and 2024, Application Document 6.3.3.2.D Appendix 3.2.D Kent Breeding Birds 2023,** and **Application Document 6.3.3.2.E Appendix 3.2.E Kent Breeding Birds 2024**.

4.2.3 Visual Impact

We note that the proposal includes a Converter Station that measures 200m x 300m and 26m in height. However, because of the low lying and relatively flat landscape coupled with a scrub covered bund situated on slightly higher ground and located between the site and Pegwell Bay, the Converter Station will not be perceptible.

Despite this there remains some concern regarding the potential future impact caused by:
• The scrub vegetation which is responsible for screening the structure from the Bay located beyond the ownership control of the applicant and its presence in perpetuity is therefore not assured.
• The Converter Station will be seen in views from Ramsgate to the northeast from where it will be seen in relation to the Trust's property at Pegwell Bay.
• The raised bund is potentially at risk of being eroded away.

As such and to protect the Trust's property at Pegwell Bay it is recommended that the examination authority consider carefully these impacts and suggested mitigation as part of the overall consideration of the visual impact of the Converter Station on the wider landscape.

Figure 6.4.3.1.7: Representative Viewpoint Locations and Screened Zone of Theoretical Visibility within **Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Part 1 of 4 [APP-240]** illustrates the theoretical visibility of the proposed Minster Converter Station and Minster Substation in the landscape and visual study area. The height of the proposed Minster Converter Station would be 28m in height. This figure demonstrates that there would likely be intervisibility between the proposed Minster Converter Station and Minster Substation from parts of the National Trust's land holding.

Viewpoint 7 along Sandwich Bay is located within this area where there is potential intervisibility (detailed within **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**). This reports that views of the proposed Minster Converter Station and Minster Substation are unlikely due to intervening vegetation.

The LVIA has been undertaken using current baseline information with regard to landform and vegetation. The 'Future Baseline' section within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** sets out that trees, woodland, scrub and riparian habitats will continue to mature but the inherent character and the contribution that they make to views and visual amenity is unlikely to substantially change.

Viewpoints 13 and 14 represent receptors on the edge of Ramsgate. Any views available towards the operational Minster Converter Station and Minster Substation would likely be limited to the upper extents due to intervening screening features. The views would typically include part of the coastal landscape at Pegwell Bay however would also be within the context of residential development within Cliffsend and existing energy infrastructure. **Table 1.13** of **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**

		records that for the Operation and Maintenance phase of the Proposed Project (Year 15) the impacts are 'Minor adverse (not significant)' for Viewpoint 13 and Negligible adverse (not significant) for Viewpoint 14. Regarding mitigation, an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and ecological mitigation (**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]** and within this **Application Document 7.5.7.2 Figure 1 Minster Converter Station and Substation Outline Landscape Mitigation)**. The delivery of this mitigation is secured by **Requirement Number 6** of the **Draft DCO** which requires the Applicant to submit for the approval of the Local Planning Authority a detailed **Landscape and Ecological Management Plan – Kent.**
4.2.4	Compulsory Purchase The National Trust Acts enable our Trustees to declare land "inalienable". This means that the land is so important to the nation that it cannot be sold or mortgaged, rather it must remain in the care of the Trust, in perpetuity. The Trust can designate such land as "inalienable" pursuant to section 21 of the National Trust Act. Once declared inalienable this designation cannot be reversed. Most of the property at Sandwich and Pegwell Bay is held inalienably. There is additional protection when a potential compulsory acquisition of inalienable land or rights over inalienable land is in prospect. In the face of an objection to a compulsory purchase order ("CPO") by the National Trust which has not been withdrawn by the time the confirming authority (the Minister) comes to deciding about whether to confirm the CPO, the CPO becomes subject to 'special parliamentary procedure' (SPP). SPP is where the matter is automatically referred to Parliament to make the decision on whether to allow the compulsory acquisition to go ahead. The Trust can then petition against the Order and this is considered by a joint committee of both Houses of Parliament.	The Applicant is aware of the status of National Trust Inalienable land and has shown the National Trust land in the Application Document **4.2.3 Statement of Reasons Appendix C Special Category Land Report (PDA- 013)** and **Application Document 2.4 Special Category and Crown Land Plans (PDA-007 and PDA-008).** in this regard. The Applicants are engaging with National Trust and their occupiers in respect of the land rights sought and are hopeful that through ongoing negotiations a voluntary agreement can be reached without the need for Special Parliamentary Procedures to apply. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.2.5	Conclusion Given the potential impact this proposal could have on the significant nature designations at Pegwell Bay, the National Trust request more in-depth details on the construction and design methods than would usually be available during the Development Consent Order (DCO) process, so that we can be reassured that the works proposed will provide the highest level of mitigation possible. The National Trust would encourage the developer to consider additional mitigation in the form of funding to support the ongoing management and future conservation of important coastal and marine species and habitats in the Pegwell Bay and Sandwich Bay SAC area and would welcome further discussion on this topic during the DCO process with the National Trust as landowner, the Kent Wildlife Trust as site manager and other key stakeholders.	The Applicant will continue to liaise with both the National Trust and Kent Wildlife Trust throughout the Examination.

~~Table 4.3~~ Table 4.3 Applicant's Response to the Relevant Representation of The National Farmers Union

Reference	Summary of relevant representation	Applicant's Response
4.3.1	1 Introduction 1.1 These are the Outline Representations of the National Farmers Union ("NFU") to the application for a Development Consent Order by the Secretary of State identified as the Sea Link Project Order. 1.2 The objectives of the NFU are to champion farming in England and Wales and to provide professional representation and service to its members. 1.3 The matters raised in these Outline Representations are matters on behalf of NFU Members located near the proposed converter station site which would be constructed on the Sandwich Bay to Hacklinge Marshes in Kent.	The Applicant welcomes the NFU's engagement with the Proposed Project and acknowledges their role and remit, acting on behalf of its members.
4.3.2	Ground Investigation and Agricultural Land Classification Surveys The NFU understands that neither ground investigation surveys nor surveys to confirm the Agricultural Land Classification have yet been undertaken on the proposed converter station site located on the Sandwich Bay to Hacklinge Marshes in Kent. The we understand is due to Unexploded Ordnance Risk in the area around the proposed site for the converter station. National Grid have advised the NFU that these surveys will be carried out and they are considering the safest way to carry out these surveys. The NFU believes it is essential that these surveys are carried out to be able to show whether the proposed site location for the converter station is suitable for this project. Further to be able to highlight the works that will be necessary if the converter station is built on this site so that all construction issues are addressed. The NFU would like to be notified when these surveys have been carried out and the results of the surveys. If it is found that the area is not suitable, the NFU would like to know what other locations are being considered. The NFU believes that the survey information is essential for the examination of the proposed scheme in this area. The NFU would also not want to see the examination of this proposal concluded before the surveys have been carried out, thus removing the ability for the proposed location of the converter station to be examined with all of the necessary information available.	A preliminary ground investigation for geotechnical and geoenvironmental purposes was undertaken in Kent from the 18 September to 1 December 2023, which considered the geotechnical properties of the strata within the Order Limits, which included investigation locations within the area of the proposed converter station to inform the preliminary design. Further details and findings of this preliminary ground investigation can be found within **Application Document 6.3.3.5.C Appendix 3.5.C Ground Investigation Report – Kent [APP-171]**. A further ground investigation will be undertaken to inform the detailed design in accordance with commitment GH01 included within the **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. The proposed Kent substation as shown in **Application Document 2.14.2: Indicative General Arrangements Plans – Kent [APP-039],** is sited on land which is Provisionally mapped as Grade 2 land (see **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]**). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a and not Grade 2 land. As such, the siting of the converter station has focussed on lower grade land through the initial review of available Provisional mapping and based on the predictive mapping. ALC distributions as detailed in the Land and Water Services Technical Note (TN/RP/01 TFS 846, MAFF 1983) shows Kent County mapped as 78.7% Provisional BMV (Grade 1: 9%, Grade 2: 20.5%, Grade 3: 49.2%). Of this Thanet District is mapped as 66% Provisional BMV (Grade 1: 44.2%, Grade 2: 17.3%, Grade 3: 4.5%). A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. • **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered.

Reference	Summary of relevant representation	Applicant's Response
		• **Application Document 7.3 Design Development Report [APP-321]**: Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. • **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]:** Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. • **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. • These documents set out the many factors considered in identifying site options and selection of a preferred option, which included the presence of BMV land. However, as most of the farmland in the area is BMV, as set out above, the opportunities for complete avoidance, whilst balancing many other factors, were very limited. The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site.
4.3.3	Hydrology Concerns The NFU understands that the converter station in the Sandwich Bay to Hacklinge Marshes is proposed on soft alluvial clay soil surrounded by ditches. There is particular concern around the suitability of the very soft soils for the major construction of a converter station plus contamination of the underlying hydrology. It is noted that Chapter 6 of the Environmental Statement outlines that the assessment of soils and sensitivity to handling, storage and reinstatement has been based on the available desktop information and predictive ALC mapping, which the NFU thinks is not acceptable for a site like this. At the stage where the soil surveys have been carried out and if the results show that it is acceptable to build the converter station, the NFU would like to understand what measures will be undertaken to mitigate any impact of such a large construction on very sensitive soils. The concern over building on the alluvial clay is the risk of the water being removed turning acidic when oxidised polluting the watercourses. The NFU would like to understand what National Grid is doing to prevent any pollution to the watercourses.	The hydrological regime of the land at the site of the converter station would be maintained during construction of the Project and during its operation, as detailed in a series of commitments set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. A preliminary ground investigation was undertaken in Kent from the 18 September to 1 December 2023 for the Proposed Project which considered the geotechnical properties of the strata within the Order Limits to inform the preliminary design. Further details and findings of this preliminary ground investigation can be found within **Application Document 6.3.3.5.C Appendix 3.5.C Ground Investigation Report – Kent [APP-171].** A further ground investigation will be undertaken to inform the detailed design of the Proposed Project in accordance with commitment GH01 included within the **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. Measures (including W06, W10, W11 and W14) ensure that as an early activity in the construction schedule Sustainable Drainage Systems (SuDS) will be incorporated, appropriate to the existing ground conditions (with infiltration to ground preferred where conditions are suitable) and severance of existing land drainage routes, including agricultural field drainage systems, would be managed.

Reference	Summary of relevant representation	Applicant's Response
		Drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring recharge quantities from one catchment to another. The SuDS will also provide for suitable treatment of surface water runoff, to ensure no detriment to the water quality of the local water environment (see measures W19 and W23 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**). The Applicant has prepared a Qualitative Groundwater Risk Assessment presented as **Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-171],** which includes discussion of the potential impacts and effects associated with potential dewatering. A key project assumption is that any discharges from dewatering would be subject to the relevant permit applications in accordance with the commitments included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. The assessment provided in **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]** concludes that temporary construction impacts from dewatering would be negligible which for groundwater and groundwater receptors (high sensitivity) would result in a negligible effect which would be not significant. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** contains commitments that include measures to protect groundwater (quality) including GH02 (provision of Foundation Works Risk Assessment), GH08 (protocol for dealing with unexpected contamination) and GH09 (Hydrogeological Risk Assessment). Commitment GH09 requires that the nature and scope of any remediation or mitigation (based on the Hydrogeological Rik Assessment) is agreed with the Environment Agency or other stakeholders. Commitment GG15 describes that there will be no intentional discharge of site run off to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of an emergency).
4.3.4	Request to Attend Hearings and make Representations The NFU will if required lodge a full Written Representations in due course and requests to make oral representations at the issue specific hearings and the compulsory acquisition hearing or any other hearings which may be held on behalf NFU members which are directly affected by the proposed projects.	The Applicant acknowledges the comments raised.

Table ~~4.4~~ 4.4 Applicant's Response to the Relevant Representation of Aldeburgh Golf Club

Reference	Summary of relevant representation	Applicant's Response
4.4.1	Please accept this letter as confirmation that we have been appointed to act on behalf of our client, Aldeburgh Golf Club, in respect of the above public consultation.	The Applicant notes the appointment of Armstrong Rigg and welcomes their engagement with the proposed project on behalf of Aldeburgh Golf Club. The Applicant confirms the landowner has interest in the following land plots in Suffolk: 5/9 - Class 6. Compulsory Acquisition of Rights - Drainage 5/6 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/7 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/11 - Class 6. Compulsory Acquisition of Rights - Drainage 5/12 - Class 5. Compulsory Acquisition of Rights - Access 5/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/5 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/4 - Class 6. Compulsory Acquisition of Rights - Drainage 5/8 - Class 5. Compulsory Acquisition of Rights - Access 5/19 - Class 5. Compulsory Acquisition of Rights - Access 5/17 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure.
4.4.2	Aldeburgh Golf Club (AGC) is one of the leading golf courses in the UK (ranked number 1 in Suffolk and 80 in Golf Monthly's UK's Top 100 Courses in 2025/26). As such it makes a significant contribution to the local economy, attracting visitors to the area and supporting the employment of over 20 full time equivalent staff; and makes a significant contribution to the health and wellbeing of the community. It is a local business that relies on the health of the local economy for its success and will consequently suffer from the wider Economic Impact of these proposals on East Suffolk. AGC is a significant landowner located at the western edge of Aldeburgh with Golf Courses on either side, north and south of Saxmundham Road (A1094), the road linking Friston to the Coast. On AGC's behalf we made representations to the non-statutory public consultation in December 2022 on the Sea Link proposals, and the statutory public consultation in December 2023. Representatives of the Club have met with members of the Sea Link team on a number of occasions to explain their specific concerns and to try to find solutions to safeguard the Club's golfing interests as far as possible. Notwithstanding, AGC objects to the Sea Link proposals in the strongest possible terms. Their objections fall into three categories: (i) That the fundamental need for the Sea Link Project has not been established; notwithstanding which (ii) That the selection of the proposed landfall site and route is flawed; notwithstanding which (iii) That the selection of the proposed Route across AGC land is flawed. These are detailed in turn below.	The Applicant confirms it recognises the significance of the golf course within the local community. Responses to the objections are listed below.

Reference	Summary of relevant representation	Applicant's Response
4.4.3	**The Fundamental Need for the Sea Link Project** AGC have raised strong objections to this major infrastructure energy project either in isolation or in combination with other local Nationally Significant Infrastructure Projects - East Anglia One North, East Anglia Two, including the Friston sub-station which were granted a consent Order on 31 March 2022; Lion Link (public consultation 2023); and Sizewell C, recently given the go ahead by the UK Government with a projected timeline of at least 10years. These strong objections are raised on the basis of: • The serious impact of their construction, maintenance and operation on the sensitive and valued local landscape and wildlife habitat. • Traffic impacts, with projected increases in traffic movement and particularly of HGVs leading to congestion and safety concerns for members and visitors accessing the Club's courses. • Economic impacts with the effects of the development highlighted above having a severe negative impact on the attractiveness of and access to the area with a consequent decline in visitor numbers and a serious detrimental economic impact on the Club and its operations. What remains absent is a coordinated strategic approach to these projects which seeks to co-locate and limit their significant environmental and commercial effects. It is unacceptable for such major, environmentally impactful projects to be brought forward on a piecemeal basis, which threaten to blight the area for the foreseeable future. It is inappropriate to seek to justify this approach on the basis that they are being progressed by different companies at different design stages. These are nationally important infrastructure projects with far reaching environmental, social and economic impacts which should be coordinated as such to limit impacts and disruption to the communities affected. Our representations to the non-statutory and statutory consultation made the point that consideration of the Sea Link proposals in isolation were premature and the case for the need for Sea Link is fundamentally incomplete in the absence of: 1. An ENERGY INFRASTRUCTURE STRATEGIC PLAN encompassing: a. Existing & future Offshore Wind Projects (including EA1N & EA2); b. Sizewell B and the now approved Sizewell C nuclear plants; c. Future onshore renewable projects (e.g. solar); d. Grid Reinforcement (like Sea Link); e. 'Multipurpose' Interconnectors (like Lion Link); f. Complementary (and necessary) Technology to large-scale intermittent renewable generation such as Battery Energy Storage Solutions (BESS) and Power-to-X (like Green Hydrogen); g. Associated Landfall, Cable Route, Converter Station and Sub-Station requirements and associated BESS and Power-to-X infrastructure; 2. A COMPARATIVE STUDY of all GRID OPTIONS and LANDFALL SITES including: a. Offshore grids and/or more extensive use of multipurpose interconnectors such as Lion Link to integrate Landfall, Cable Routes, Converter Locations and Connections; b. Brownfield Sites for Landfall and Infrastructure; and 3. A TRANSPARENT ASSESSMENT of the CUMULATIVE IMPACT of the potential energy infrastructure in East Suffolk, where we have particular concerns over the permanent cumulative and growing impact on the Environment and Local Economy of creating an 'Energy Hub' at Friston and its future role as the logical host for future BESS and Power-to-X Technology	There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**. This sets out the up-to-date and current needs case and reflects the outcome of a backchecking exercise undertaken of the needs case that accompanied the statutory consultation in 2023. The 2023 needs case is set out in **Application Document 8.3 Strategic Options Report (October 2023) [App-370]**. This back check was undertaken by the Applicant prior to the submission of the application, to confirm that the needs case remains valid and that the strategic options considered continue to meet it. This is summarised below, in the context of the specific points raised in the representation. **NGET's role** National Grid Electricity Transmission (NGET) is the owner of the high voltage transmission system in England and Wales. NGET has legal duties under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical transmission system. The network must also have sufficient capability to operate even in fault conditions (where parts of the existing network are down, for example due to damage caused by bad weather), so that faults do not result in widespread supply interruptions. NGET must develop a network which can accommodate power flows from existing as well as contracted sources of generation, interconnection, and battery storage. This is that which has connection offers from the National Energy System Operator (NESO) to connect into the network at a future time. **Needs case context** There has been, and continues to be, growth in the volume of renewable and low carbon generation that is proposing to connect to the transmission network in the East Anglia and South East regions. There is also a growing demand for interconnection to Europe, which contributes to balancing the network by evening out the peaks and troughs that can occur with renewable generation (e.g. lower generation at times of low wind). There is significant existing and contracted generation and interconnection in the East Anglia and South East regions. There is a suite of separate NGET projects which contribute to reinforcing the transmission network cross the East of England, including the proposed new overhead line between Bramford and Twinstead and between Norwich and Tilbury. However, further issues remain that require addressing. **Needs case summary** The Sea Link project addresses two distinct system needs, which arise separately in the transmission networks in East Anglia and the South East. These are summarised below: South East Sea Link will address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. This is driven by the interconnectors landing in Kent due to its proximity to mainland Europe, as well as growth in other renewable and battery storage projects. Sea Link has to connect on the network no further west than Canterbury North substation, to provide an additional route for power to flow out of Kent in a scenario where there is fault on the existing overhead line between Canterbury and Kemsley. East Anglia Sea Link will support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. Sea

Reference	Summary of relevant representation	Applicant's Response
	and infrastructure, as well as the connection point for future Offshore Wind, Onshore Renewable and Interconnector Projects.	Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this area (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford. Sea Link is also particularly important because it bypasses the existing network around north Kent, the Thames Estuary, and London, avoiding putting more power onto these already constrained parts of the network, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As an HVDC link can be configured to transfer power in both directions, it can benefit multiple areas in the East Anglia and South East regions. Sea Link represents a coordinated approach to solving the above issues using a single solution. **Strategic coordination** The Electricity System Operator (ESO) published the Holistic Network Design (HND) report in July 2022. The HND sets out a single integrated transmission network design that supports the large-scale delivery of electricity generated from offshore wind. The process by which generators apply to the Electricity System Operator (ESO) for connections into the National Electricity Transmission System (NETS) is also set out in the **Application Document 7.2 Strategic Options Report Back Check [App-370]** (this also applies to interconnectors). Notwithstanding Sea Link's role as part of a holistic and integrated transmission network, and the formal process (overseen by the ESO) by which generators and interconnectors secure connection agreements, the approach that the Applicant has taken to developing the Proposed Project is set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**, and, in terms of how the Proposed Project is coordinated with others in the area, **Application Document 7.10 Coordination Document [APP-363].** Other energy projects referenced by the stakeholder are separate from the Proposed Project, being promoted by different developers and working to different timescales for delivery. The Applicant is committed to coordinating consenting and delivery with other projects where opportunities are available, including the colocation of infrastructure where it can be demonstrated that this will support reductions in cumulative impacts. Cumulative effects have been carefully considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** This document discusses combined effects with EA1N, EA2, Sizewell C, Lionlink and a range of other projects. The Applicant is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network. While it is recognised that In Europe there is a trend towards multiple windfarms feeding into offshore converter stations, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station. This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.

Reference	Summary of relevant representation	Applicant's Response
		With regard to economic impacts, **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** of the Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** has been submitted in outline form to specify and secure the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding highway and walking/ cycling networks. This document provides details on management, mitigation, monitoring and review within Section 7, as well as details on compliance and enforcement within Section 8. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant effects on the surrounding highway, following the measures identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]**. Monitoring and enforcement are also embedded through: • **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3 Outline Onshore CEMP [APP-340]**; and • **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which outlines all mitigation measures and assigns responsibility for implementation and monitoring. This is a secured document as it forms Appendix B of the Outline Onshore Construction Environmental Management Plan (CEMP) which is secured by requirement
4.4.4	**Sea Link Proposed Landfall & Route** Notwithstanding the above, it is particularly concerning that the proposed route impacts directly on Golf Club land. AGC objects to the proposals in the strongest possible terms. The proposed route would have significant impacts on the Heritage Coast, AONB, Special Protection Area, Important Bird Area and RSPB reserves. A 'Suffolk Site 1 – Alternative' illustrated in the Sea Link Options and Design Evolution Report consulted upon at the statutory consultation stage (2023) showed a route already impacted by Sizewell and its associated infrastructure and pylons etc. This route showed a means by which a route could be provided which would incorporate the benefits of co-location, reduce construction disruption and avoid more protected environments than the application route. The Lion Link project is well behind Sea Link in its progress towards an application being made, with a range of options still under consideration. This undermines the reason given for discounting a connection and route from Sizewell (Suffolk Site 1 – Alternative), i.e. that the benefits of co-location outweigh the technical difficulties of delivering the Alternative route from Sizewell. The conclusion must be drawn that technical difficulties associated with delivery are being afforded priority over environmental impacts. The National Planning Policy Framework (NPPF) leaves no doubt as to the importance which should be afforded conserving landscape and scenic beauty in	A staged approach was adopted to identify corridors and preliminary routeing and siting options for the Proposed Project, considering environmental and socioeconomic factors as well as technical and engineering design considerations, and cost. The approach was used to identify 'on-balance' preferences for landfalls, converter station sites and potential route corridors within which preliminary alignments could be developed. Each of the options identified for the converter site areas and cable route corridors were appraised in accordance with National Grid's approach to options appraisal. In addition, in the absence of guidance for specific siting of converter stations, the Horlock Rules were applied. Although these were developed for the siting of substations, they were considered appropriate to use when identifying and appraising converter site Areas. Details of the appraisal process are set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**. In the decision-making process, the Applicant is guided by its duty to balance the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. The sensitivity of the area is noted. The routeing and siting of the Suffolk Onshore Scheme has taken into consideration designations, including the Suffolk Coast & Heaths AONB and Suffolk Heritage Coast. The effects arising from the Suffolk Onshore Scheme on the AONB (and Heritage Coast) are outlined within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1**

Reference	Summary of relevant representation	Applicant's Response
	Areas of Outstanding Natural Beauty (AONB) which have the highest status of protection in relation to these issues, as should the conservation and enhancement of wildlife and cultural heritage in these areas. Paragraph 190 of the NPPF makes it clear that major development as defined by footnote 67 of the NPPF, for which these proposals would certainly qualify, should be refused other than in exceptional circumstances, including an assessment of: a) The need for the development, including in terms of any national considerations, and the impact of permitting it or refusing it, upon the local economy; b) The cost of, and scope for developing outside the designated area, or meeting the need for it in some other way; and c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. We maintain that a full and proper assessment of the proposals against criteria b) and c) has not been conducted including the scope to progress less damaging alternatives. Accordingly, the proposals do not satisfy this test and if progressed to application unaltered should be refused. This important national policy is not somehow disengaged by the nature of these proposals with the National Planning Practice Guidance (NPPG) advising that a need for renewable energy does not override environmental protections nor indeed the planning concern of local communities. The application leans on advice from National Policy Statement (NPS) EN-1 that exceptional circumstances to justify the projects location in the National Landscape is confirmed via paragraph 4.2.17. Notwithstanding we consider this does not absolve the applicant from needing to demonstrate that the development could not be delivered outside the designated area or in some other less environmentally damaging way. Comments in the Planning Statement supporting the application, describe the cumulative effects of the Suffolk On-Shore Scheme, Sizewell C, EA1N, EA2 and Lion Link as significant but short term and temporary, while also claiming that the proposals are not likely to detract from the natural beauty and special characteristics of the National Landscape. We maintain that neither conclusion is valid. The cumulative effects of the infrastructure projects will be significant and lengthy with the construction period likely to be in excess of 15 years. Furthermore, the effects of the application proposals on the natural beauty and special qualities of the National Landscape will be very damaging, far reaching and irreversible. The proposed route will directly impact on communities, settlements and countryside areas which unlike Sizewell have not thus far been impacted. In so doing these proposals do not demonstrate the ability to meet the energy infrastructure needs in a way which can: • Limit environmental damage and disruption; • Avoid landscape designations; • Limit visual impacts; • Limit ecologically designated and sensitive sites; • Avoid recreational areas; and • As far as possible co-locate infrastructure and cable routes to maximise opportunities for joint working and limit environmental impacts.	**Landscape and Visual [APP-048]. Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-145]** sets out an assessment of landscape effects for construction, operation and maintenance on the Suffolk Coast and Heaths AONB, including potential effects from lighting and on tranquillity. This includes an assessment on Natural Beauty Indicators identified within the Suffolk Coast and Heaths AONB and Special Qualities Indicators published by Suffolk and Essex Coast and Heaths National Landscape Partnership. Paragraph 5 of **Application Document 7.1 Planning Statement [AS-057]** makes it clear that the NPPF does not contain specific policies for developments requiring development consent and that applications in relation to developments requiring development consent are to be determined in accordance with the decision-making framework set out in the PA 2008 (H.M Government, 2008) as set out in Section 2.2 of the **Planning Statement [AS-057]**. On this basis the NPPF is not considered to be as the same relevance to the SoS as the relevant Energy NPSs in determining whether or not to make the Order. However, the NPPF is capable of being an important and relevant consideration in the SoS's decision-making for NSIPs and as such, compliance in relation to its policies, where relevant, is set out in Sections 6 and 7 of the **Planning Statement [AS-057]**. The Planning Statement makes clear that in light of the Proposed Project's Critical National Priority (CNP) infrastructure status, paragraph 4.2.8 of NPS EN-1 states that the CNP policy will "influence how the Secretary of State considers tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application". As the Proposed Project has developed, the Applicant has rigorously assessed the impact on designated sites and the wider environment, adhering to the "mitigation hierarchy" by avoiding, minimising, restoring, and offsetting impacts. In terms of a mitigation strategy and coordination, the Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363]** and cumulative traffic impacts are assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced **Application Document 7.10 Coordination Document [APP-363]** to minimise environmental and local community effects of Sea Link in combination with other projects.
4.4.5	**Sea Link Proposed AGC Route** Notwithstanding the above, AGC contends that the selection of the proposed route in the region of the Golf Club is fundamentally flawed as it did not take into account the full environmental and commercial impact.	The ES has fully assessed the impact of the Proposed Project on the environment, along with socio-economic impacts, ensuring that measures are taken to minimise and reduce any adverse effects. The assessments have helped inform the evolving design to ensure that the Proposed Project has had regard for sensitive environmental receptors. Further details on the

Reference	Summary of relevant representation	Applicant's Response
	The proposed route impacts on Aldeburgh Golf Club land within the AONB. Indeed, it directly impacts on an area of the Golf Club land where the course is being extended. The Club have implemented extremely costly improvements to their championship course through the creation of new golf holes designed by international leading golf architects and granted planning permission by East Suffolk Council (Planning application reference DC/22/2697/FUL) in March 2023. Representatives of the Golf Club have met with Sea Link to discuss their respective proposals, and it is understood that should the Sea Link proposals get permission and go ahead as currently proposed they will inevitably negatively impact on: • The appearance and attractiveness of the course; • Noise and disturbance impacting on enjoyment of the course by fee paying members, visitors, neighbours of the course and those utilising the public footpath network etc; • Landscape and ecological enhancements which are being delivered upfront by the Club as part of the course extension works to comply with a pre-commencement planning condition of the planning permission for the new holes; • The enjoyment of playing the new holes; • Greenkeeping staff's ability to maintain those parts of the Club's land impacted by the construction works; • Disturbance to the turf nursery which the Club intends to bring forward alongside the delivery of the new holes in part of the site impacted by the Sea Link construction works. • Restrict land available within the Club's ownership for the construction of a reservoir AGC does not believe that the full environmental and commercial impact of the proposed cable corridor across its land was fully understood by National Grid at the time of their assessment and that, as a result, the selection of their proposed route across AGC land is fundamentally flawed.	assessment and proposed mitigation are contained in the relevant technical chapters of the ES. The Applicant's approach to route selection, outlined in the documents mentioned in the above sections, along with **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** comments is considered to be thorough and robustly justified. The Applicant acknowledges the investment that AGC has made and plans to make in its facilities and will continue to engage with Aldeburgh Golf Club on an ongoing basis to discuss matters relating to works required on their land and construction and restoration programme. Concerns about the potential effects in relation to the appearance of the course are acknowledged. However, careful attention has been paid in the design and construction programme/methods for the Proposed Project to the possibility of habitat severance. The commitment to a trenchless solution is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through Requirement 6 of **Schedule 3 of the draft DCO (Application Document 3.1) [APP-007]**. Furthermore, following construction, the HVDC cable route, will be fully reinstated subject to the powers in the DCO. As stated above, the sensitivity of the area is acknowledged and the routeing and siting of the Suffolk Onshore Scheme has taken into consideration designations, including the Suffolk Coast & Heaths AONB and Suffolk Heritage Coast. The effects arising from the Suffolk Onshore Scheme on the AONB (and Heritage Coast) are outlined within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-145]** sets out an assessment of landscape effects for construction, operation and maintenance on the Suffolk Coast and Heaths AONB, including potential effects from lighting and on tranquillity. This includes an assessment on Natural Beauty Indicators identified within the Suffolk Coast and Heaths AONB and Special Qualities Indicators published by Suffolk and Essex Coast and Heaths National Landscape Partnership.
4.4.6	The proposed route of Sea Link would clearly negatively impact on the attractiveness of the course as a destination for golf and its existing and future operations with substantive adverse economic consequences for the Club and the Local Economy. For the reasons explained AGC remain strongly opposed to the proposals.	The Applicant's duty is to balance the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. This duty underlies decision-making process at every stage of project progress. The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified for socio-economics, recreation and tourism following the application of appropriate mitigation. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on

Reference	Summary of relevant representation	Applicant's Response
		visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.
4.4.7	Without prejudice to that position the Club and its professional advisers have engaged constructively with the Sea Link team and its advisers to secure changes to the cable route across the Club's land in order to mitigate its direct impacts on the course and address the concerns outlined above. These discussions are continuing with the Club currently awaiting the first draft of the 'Statement of Common Ground' and revised Heads of Terms from Sea Link. I would be grateful if this relevant representation could be recorded and we are included as an interested party to be notified of future stages as plans progress. In the meantime, should you have any queries on the information submitted or require anything further please do not hesitate to contact either myself or my colleague Roger Welchman. Yours faithfully (Redacted) g@arplanning.co.uk) Director Armstrong Rigg Planning (Redacted)	The Applicant's agent, Dalcour Maclaren, have engaged with Aldeburgh Golf Club and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Aldeburgh Golf Club's agent in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Aldeburgh Golf Club's agent on 23rd May 2025 and 22nd August 2025. Dalcour Maclaren have continued discussions with the landowner's agent regarding the Heads of Terms. Dalcour Maclaren emailed the agent on 10th September 2025 and 15th October 2025 requesting a meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.** The SOCG is being prepared by a senior project manager for issue to the golf club in parallel with the Heads of Terms negotiations.

~~Table 4.5~~ Table 4.5 Applicant's Response to the Relevant Representation of Andrew Michael Hilliard Heald

Reference	Summary of relevant representation	Applicant's Response
4.5.1	The impact of the proposed project on the natural environment and local communities.	The Applicant thanks Mr Heald for his representation and will continue to engage in respect of the land rights required to facilitate the proposed project. The Applicant confirms Mr Heald has an interest in land plots in Suffolk; 2/96 - Class 6. Compulsory Acquisition of Rights - Drainage 2/84 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/94 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/87 - Class 5. Compulsory Acquisition of Rights – Access 2/85 - Class 7. Compulsory Acquisition of Rights – Mitigation 2/91 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/66 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/23 - Class 1. Compulsory Acquisition of Land 2/92 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/93 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/95 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/27 - Class 1. Compulsory Acquisition of Land 3/30 - Class 1. Compulsory Acquisition of Land 3/24 - Class 6. Compulsory Acquisition of Rights - Drainage 3/28 - Class 1. Compulsory Acquisition of Land 4/19 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/29 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/25 - Class 6. Compulsory Acquisition of Rights - Drainage 3/32 - Class 5. Compulsory Acquisition of Rights - Access 4/17 - Class 6. Compulsory Acquisition of Rights - Drainage 4/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/5 - Class 5. Compulsory Acquisition of Rights - Access 3/38 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 3/33 - Class 5. Compulsory Acquisition of Rights - Access 4/26 - Class 9. Temporary Use for Access 3/40 - Class 3. Compulsory Acquisition of Rights - Underground Cable System

Reference	Summary of relevant representation	Applicant's Response
		4/8 - Class 5. Compulsory Acquisition of Rights - Access 3/31 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/2 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/26 - Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/6 - Class 5. Compulsory Acquisition of Rights - Access 4/24 - Class 5. Compulsory Acquisition of Rights - Access 4/25 - Class 9. Temporary Use for Access 4/10 - Class 5. Compulsory Acquisition of Rights - Access 4/15 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 3/36 - Class 1. Compulsory Acquisition of Land 3/39 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/2 - Class 3. Compulsory Acquisition of Rights - Underground Cable System; 5/1 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; 4/9 - Class 6. Compulsory Acquisition of Rights - Drainage 4/4 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/16 - Class 5. Compulsory Acquisition of Rights - Access 2/7 - Class 1. Compulsory Acquisition of Land
4.5.2	The impact of the proposed project on the natural environment and local communities.	The impact of the Proposed Project on ecology in Suffolk has been considered in detail in **Application Documents APP-049 (Part 2 Suffolk Chapter 2 Ecology and Biodiversity), APP-060 (Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects)** and **APP-290 (Habitats Regulations Assessment Report)**. This includes assessment of impacts on Sites of Special Scientific Interest (SSSI), habitats for migratory birds, and the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, in **APP-342** (Register of Environmental Actions and Commitments) and **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059].** With the implementation of these measures, it is concluded that no significant residual long term adverse effects will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Development. The effects of the Proposed Project on landscape designations, including the Suffolk Coast and Heaths AONB, the defined Suffolk Heritage Coast and landscape character are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. This assessment takes into consideration both the sensitivity of the receptors, of which value forms part of this judgement, and the magnitude of effect on the landscape receptor arising from the Proposed Project.
4.5.3	The impact of the proposed project on the natural environment and local communities.	Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued on 28 February 2025 and

Reference	Summary of relevant representation	Applicant's Response
		subsequently revised versions of the Heads of Terms were issued to Mr Heald's agent on 22nd August 2025. Dalcour Maclaren are continuing to make attempts to engage and have written to Mr Heald on 29th October 2025 with copies of the Heads of Terms for their consideration. Further detail of engagement is set out in Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.

Table ~~4.6~~ 4.6 Applicant's Response to the Relevant Representation of Anthony J Curwen

Reference	Summary of relevant representation	Applicant's Response
4.6.1	My concern is over the whole Sea Link project, siting of the associated converter stations and pylon routes. As a resident in the East Kent area my concerns are specifically focussed on the following:	The Applicant thanks Mr Curwen for his representation and will continue to engage in order to negotiate the voluntary land rights needed for the project. The Applicant confirms that the landowner has interest in land plots in Kent: 1/1 - Class 5. Compulsory Acquisition of Rights - Access 1 / 2 - Class 5. Compulsory Acquisition of Rights – Access 2/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/9 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/6 - Class 5. Compulsory Acquisition of Rights - Access 2/2 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/96 - Class 6. Compulsory Acquisition of Rights - Drainage 2/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/13 - Class 6. Compulsory Acquisition of Rights - Drainage 1/20 - Class 5. Compulsory Acquisition of Rights - Access 1/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/90 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 1/19 - Class 1. Compulsory Acquisition of Land 1/9 - Class 5. Compulsory Acquisition of Rights - Access 1/22 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/15 - Class 6. Compulsory Acquisition of Rights - Drainage 2/95 - Class 5. Compulsory Acquisition of Rights - Access 1/16 - Class 5. Compulsory Acquisition of Rights - Access 2/3 - Class 5. Compulsory Acquisition of Rights - Access 2/21 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/1 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/6 - Class 6. Compulsory Acquisition of Rights - Drainage 2/10 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/17 - Class 6. Compulsory Acquisition of Rights - Drainage 1/11 - Class 6. Compulsory Acquisition of Rights - Drainage 2/94 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure ¼ - Class 5. Compulsory Acquisition of Rights - Access 1/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/13 - Class 5. Compulsory Acquisition of Rights - Access 1/21 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/4 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/7 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure

Reference	Summary of relevant representation	Applicant's Response
		1/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/99 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/5 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/7 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/8 - Class 6. Compulsory Acquisition of Rights - Drainage 1/8 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/104 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/93 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/5 - Class 5. Compulsory Acquisition of Rights - Access 1/3 - Class 5. Compulsory Acquisition of Rights - Access
4.6.2	The trenching through the Pegwell Bay RAMSAR site and nearby SSSIs.	As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]**, the Proposed Project considered six landfall areas of search within the Kent study area. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay, these are illustrated on Plate 5-3 of that document. For the reasons set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]** the north Kent coast landfall areas of search were ruled out due to significant technical and environmental constraints on the marine approaches and the landfall close to Broadstairs was ruled out due to significant constraints on the onward terrestrial route corridor. The CPRSS recognised the ecological constraints of the Pegwell bay landfall area of search but also identified that trenchless construction techniques could be used to avoid impacts on the sensitive saltmarsh habitat. There will be no open-cut trenching through the saltmarsh at Pegwell Bay. The Applicant has committed to a trenchless technique in Pegwell Bay in the DCO. The trenchless solution will exit at a location between 105 and 140 m below the lower boundary of the saltmarsh habitat, within the mudflats of the intertidal zone of Pegwell Bay. Thus, the priority habitat 'Coastal Saltmarsh' within the marine environment will be completely avoided. All impact pathways related to the exit for the trenchless technique in Pegwell Bay relevant to benthic ecology have been considered in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075]** and in relation to features of designated sites in **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**.
4.6.3	The location of the converter station and associated buildings on marshland and the major and detrimental disturbance construction will have on all wildlife in the area.	A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].** **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered.

Reference	Summary of relevant representation	Applicant's Response

Application Document 7.3 Design Development Report [APP-321]: Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for.

Application Document 8.1 Corridor Preliminary and Routeing and Siting Study (October 2022) [APP-368]: Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation.

Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]: Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation.

These documents set out the many factors considered in identifying site options and selection of a preferred option.

The proposed converter station is located within an arable field rather than on marshland. Construction disturbance on wildlife has been assessed in **Application Document AS-047 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** with mitigation measures outlined in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** introduced to ensure this is not significant. These include:

- Use of noise reduction techniques to reduce noise to an acceptable level over as much of the site as possible.
- Programming the overhead line pylon base installation to avoid the core wintering period of October to February, thus considerably reducing the extent of disturbance and displacement of wintering birds south of the River Stour, on the basis that this area is of greatest importance for non-breeding birds.
- Programming works that would increase noise levels at Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) above 60dB to avoid the bird nesting season of March to June
- Ensuring disturbing works commence in an area prior to the start of the Cetti warbler nesting season where possible. A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. A specific decision will then be undertaken in discussion with the ecological clerk of works over the construction activities that can take place in that area while the nest is active.
- Undertaking update water vole, otter and beaver surveys of watercourses to be crossed to enable burrows to be avoided where possible or riparian mammals to be excluded from the works area if necessary.
- Ensuring that lighting controls are implemented during construction.

The use of best practicable methods to reduce noise is commitment B44 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and**

Reference	Summary of relevant representation	Applicant's Response
		Commitments, while a commitment to a seasonal restriction, as identified above, is in commitments B48, B50 and B51 of the same document. Moreover, the planting proposed around the converter station will result in a long-term net increase in the amount of species-rich grassland, woodland and wetland habitat compared to the current situation. There is no reason to assume that wildlife populations would not recover from any residual disturbance that did arise following implementation of these measures. Part of the works area was subject to temporary habitat losses and disturbance to facilitate the construction of the current Richborough to Canterbury overhead line completed in 2021 with no long-term impact on wildlife populations.
4.6.4	The location of these buildings will also have a profound affect on the flooding in this area. As an individual who has farmed the area for a generation I understand the impact of extra runoff can cause.	The Projects design for the converter station and associated development embeds a range of measures to capture, manage and attenuate surface water runoff from impermeable land areas. The overarching drainage principles that will be applied are described in **Appendix C of the Flood Risk Assessment (Application Document 6.8)**. A commitment is also secured for the Contractor to develop a Drainage Management Plan and this must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing demonstrating how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated. This is included within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**.
4.6.5	Of paramount interest to me as an individual is the route of the pylons connecting the stations to the Richborugh Connection Line south of the River Stour. The river is a flightpath for many birds on daily flight routes from Pegwell Bay, There are over 35 red listed bird species in this area and research demonstrates that there is significant bird kill on overhead lines. This will be exacerbated manyfold with the pylons and lines crossing the river and at right angles to the existing Richborough Power Line. Mitigation of such lines (especially at right angles across known flight paths) does not work. In short the Sea Link will have profound consequences for wildlife, for flooding, for agriculture and for the community as a hugely valued natural space	An assessment of avian collision risk is presented in ES Appendix 3.2.F Vantage Point Survey Report [APP-152], which is supported by the results of corpse searches along the existing OHL network presented in **ES Appendix 3.2.G Overhead Line Mortality Monitoring Survey Report [APP-153]**. This shows that for the majority of species the risk of collisions is fewer than one individual annually. Even for species where the extrapolated number of transits through the 'at risk' zone generates a potential collision event that exceeds one individual per year, such as Cormorant, Greylag Goose and Mallard, given the caveats in generating the extrapolated annual transits and absence of modelling for predicted collisions, these annual figures are low in comparison to regional populations. The recorded mortality from corpse searches along the existing OHL network in the Survey Area was only noted for a limited number of species. Notably, many of the species recorded as making a large number of flights through the risk zone, were not among those species recorded as collision events, e.g., Cormorant, Greylag Goose and other duck species, beyond Mallard. Indeed, for species such as Cormorant, observations of flights regularly recorded the species passing over the existing OHL. Although the risk of significant mortality is therefore assessed as low, mitigation measures in the form of bird diverters will be included on the new section of overhead line. On other overhead powerlines around sensitive wetlands (an example being the Wildfowl and Wetland Trust reserve at Welney) the bird diverters have spinning reflectors, with glow-in-the-dark panels, which makes them more visible for a time after dusk. Hanging deflectors are also used. It is considered that in the context of the proposed Kent Onshore Scheme and species involved hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions. The diverters are commitment B55 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**.

Reference	Summary of relevant representation	Applicant's Response
		It is incorrect to state that mitigation of overhead powerlines (presumably referring to bird diverters) does not work. Such measures are recommended as effective mitigation by government agencies such as Natural England and NatureScot, are specifically referenced in National Policy Statement EN5 (Electricity Networks Infrastructure), and have been implemented by conservation bodies (such as the Wildfowl and Wetland Trust) on their own reserves.
4.6.6		The Applicant's agent, Dalcour Maclaren, have engaged with Mr Curwen and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Curwen's agent in meetings throughout February 2025. Populated Heads of Terms were issued on 6th March 2025. Dalcour Maclaren have continued discussions with Mr Curwen's agent regarding the Heads of Terms and are looking to schedule a further meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**

~~Table 4.7~~

Table 4.7 Applicant's Response to the Relevant Representation of Brooks Leney on behalf of Blackheath

Reference	Summary of relevant representation	Applicant's Response
4.7.1	We act on behalf of Blackheath Farms Ltd, being the landowner of land and property known as the Blackheath Estate (the "Estate"). We are instructed to submit the following representation in response to the National Grid statutory consultation. The Estate is affected by the proposed National Grid Sea Link project (the "scheme"), which sees cables being brought onshore and laid underground up to the necessary substation. We have been instructed to submit the following concerns;	The Applicant welcomes Blackheath Farms Limited's engagement with the Proposed Project. The Applicant confirms that Blackheath Farms have an interest in the following plots in Suffolk: Suffolk - 4/16 - Class 5. Compulsory Acquisition of Rights - Access 4/19 - Class 5. Compulsory Acquisition of Rights - Access 3/29 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/25 - Class 6. Compulsory Acquisition of Rights - Drainage 3/40 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/24 - Class 5. Compulsory Acquisition of Rights - Access 3/39 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/33 - Class 5. Compulsory Acquisition of Rights - Access 4/25 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/4 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/1 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/9 - Class 6. Compulsory Acquisition of Rights - Drainage 5/1 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/2 - Class 6. Compulsory Acquisition of Rights - Drainage 4/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/17 - Class 6. Compulsory Acquisition of Rights - Drainage 3/32 - Class 5. Compulsory Acquisition of Rights - Access 4/6 - Class 6. Compulsory Acquisition of Rights - Drainage 3/36 - Class 5. Compulsory Acquisition of Rights - Access 4/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/31 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/2 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/26 - Class 5. Compulsory Acquisition of Rights - Access 4/5 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/8 - Class 5. Compulsory Acquisition of Rights - Access 4/26 - Class 5. Compulsory Acquisition of Rights - Access 3/38 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/22 - Class 9. Temporary Use for Access

Reference	Summary of relevant representation	Applicant's Response
		2/24 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/23 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/25 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/18 - Class 5. Compulsory Acquisition of Rights - Access 4/21 - Class 5. Compulsory Acquisition of Rights - Access 4/22 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Di 4/20 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 4/23 - Class 5. Compulsory Acquisition of Rights - Access 4/7 - Class 5. Compulsory Acquisition of Rights - Access 4/12 - Class 5. Compulsory Acquisition of Rights - Access 5/3 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/23 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/24 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/94 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/92 - Class 6. Compulsory Acquisition of Rights - Drainage 2/87 - Class 5. Compulsory Acquisition of Rights – Access 3/28 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/96 - Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/85 - Class 7. Compulsory Acquisition of Rights – Mitigation 2/84 - Class 5. Compulsory Acquisition of Rights - Access 2/95 - Class 6. Compulsory Acquisition of Rights - Drainage 2/66 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/27 - Class 6. Compulsory Acquisition of Rights - Drainage 2/91 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/93 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/30. - Class 3. Compulsory Acquisition of Rights - Underground Cable System The Applicant's agent, Dalcour Maclaren, have engaged with Blackheath Farms and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Blackheath Farm's agent in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Blackheath Farm's agent on 15 April 2025, 22 August 2025 and 3 October 2025. Dalcour Maclaren have continued discussions with the landowner's agent regarding the Heads of

Reference	Summary of relevant representation	Applicant's Response
		Terms. Dalcour Maclaren met with Blackheath Farm's agent on 3 September 2025, with a subsequent Teams meeting on 27 October 2025. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.7.2	**Irrigation** – The Estate is totally reliant on irrigation, predominantly because of the light soil type which makes up most of the Estate soil. The irrigation system at Blackheath has seen significant investment since 2017, with a new reservoir, new pumps, control boards and underground mains installed. The extent of the irrigation infrastructure has been identified on a plan previously, which shows all underground infrastructure and hydrant locations. The proposed cable crosses the irrigaiton mains in various places. As National Grids Agent is aware, there are two mains out of the Hazlewood reservoir, the "200mm Transfer Main" and the "Original Hazlewood Irrigation main". Should at any point the Hazlewood Irrigation Main become severed, broken, or unusable as a result of the scheme, the whole of Halewood side of the Estate will be without water. The same applies to the 200 mm Transfer Main – should this become unusable, the Estate will lose all ability to transfer any water to the Friston side of the Estate. Both scenarios will have a detrimental impact on the Estates cropping, turnover and ultimately profitability. To provide a guide as to the area of cropping, which is reliant on water being continuously available, I provide a brief summary of this year's cropping rotation below: Potatoes 193.65 acres Onions (sets and drill) 128.73 acres Carrots 61.86 acres Turf 35.95 acres Dairy 268.73 acres Sugar Beet 173.34 acres Maize 233.02 acres Wheat 142.94 acres Pigs 115.06 acres In order to further emphasise the importance of the water, the turnover generated by the Estate's cropping and let livestock enterprises, which are all reliant on water, is in excess of £1.5 m. Should at any point the water become contaminated, or an irrigation main is interrupted or damaged, this turnover figure is significantly affected, which National Grid would be liable to compensate. The estate operate 14 irrigators, which during the summer, will all be running at any one time.	The Applicant acknowledges the concerns around field irrigation. **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils and application document (APP-342)** covers existing water supplies for livestock and irrigation systems to be identified pre-construction. Where supplies are disrupted or lost or access is compromised during construction suitable alternatives will be provided. The Applicant will ensure all systems are fully functional post construction. 1.1.3. The Applicant has worked with landowners to identify private irrigation systems, where these are known they have been included within the design as utility interfaces. **Document 6.2.1.4 Description of the Proposed Project paragraphs 4.6.32 to 4.6.36 [AS-093].** Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**. This includes measure AS04 which states that existing water supplies for livestock and irrigation will be identified pre-construction. Where supplies will be lost or access compromised by construction works, temporary alternative supplies will be provided. Water supplies will be reinstated following construction. Measure AS05 in the REAC commits to consultation with affected landowners to be carried out to investigate the current extent of land drainage which will be taken into account in the development of the Drainage Management Plan (see W14) prior to construction, with the intent of maintaining the efficiency of the existing land drainage system. Known reservoirs, including Hazlewood Reservoir, have been identified and have been excluded from the Order Limits where possible – as previously confirmed by the Applicant in **Application Document 5.1.6 Appendix E Statutory Consultation Part 4 of 4 [APP-312]**. The Applicant's land agent, Dalcour Maclaren, have engaged with Blackheath Farms and/or their agent in relation to ongoing survey works throughout 2023-2025.Throughout these meetings, the landowner raised their concerns with the irrigation main on the farm and their reliance on this water to ensure their farm remains economically viable. As part of our discussions with the landowner we have included mitigation measures as part of our accommodation works register which will be passed on to the applicant's Main Works Contractor. The project has committed to helping Blackheath Farms Ltd mitigate any losses throughout construction and operation. The project will endeavour to mitigate any losses arising from the construction of its scheme and will be fully compliant with the Compensation Code and reimburse landowners and occupiers for evidenced unavoidable losses
4.7.3	**Code of Construction Practice** - We note there is an Outline Code of Construction Practice in the documents supplied. This is very pertinent to the Estate, and we would like to be consulted on elements that should be included in this document as it is developed to ensure it addresses, where reasonable, items of concern to landowners.	The Applicant has undertaken a geophysical survey, a review of aerial photographs and LiDAR data and evaluation trenching. National Grid has maintained ongoing dialogue with Historic England through regular thematic group meetings. A full detailed assessment is provided in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and is based on the final project design as detailed within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]**.

Reference	Summary of relevant representation	Applicant's Response
	This code should apply to not just the main works but also the pre-construction investigations and mitigation works including archaeology. We are aware that there are specific requirements for archaeology that result in soil movement being carried out to preserve the archaeology to be investigated. The Estate and Brooks Leney need to be consulted to ensure the working methods are done in such a way as to minimise the impact on soils whilst also recognising the need to ensure archaeology is not destroyed before it is investigated.	Archaeological survey work is progressing. Affected landowners will be engaged throughout this process. As part of the Proposed Project EIA, baseline archaeological data has been collated and a Written Scheme of Investigation has been prepared. Please see **Application Document 7.5.4.1 Outline Overarching Written Scheme of Investigation – Suffolk (OWSI) [APP-343]**. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, outlines mitigation measures embedded within the Proposed Project. These are controlled through **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through Requirement 6 of **Schedule 3 of the draft DCO (Application Document 3.1) [AS-012]**. Additionally, The **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** has been developed to provide the necessary guidance in relation to soil handling and management, including, where land is being returned to agriculture at the end of the construction phase, that this land should be returned to the pre-construction Agricultural Land Classification (ALC) grade and providing clarity on how different soil types and/or soil horizons (topsoil and subsoil) should be handled, stockpiled, and restored in different ways depending on the soil profile and associated characteristics required to support the proposed end use The Applicant will continue to engage with the Estate on an ongoing basis.
4.7.4	**Soil** - We request that an obligation is placed on National Grid and/or its appointed contractors to undertake a detailed soil analysis pre and post construction along the route of the cable. This will enable the Estate to properly assess the impact the scheme will have had on its soil quality in order to then assess remedial works required to put the land back in the same order as it was preconstruction. This survey needs to be carried out by a suitably qualified soil scientist with experience of analysing soils for agriculture and preferably experience of linear construction projects. Furthermore, we request that National Grid, under the Soil Management Plan, are obligated to establish a cover crop (such as a clover mix) on the soil bunds to prevent soil run off during wet weather, or wind erosion during adverse weather. Due to the nature of the soil types, blowing sand is common and thus this must be managed when the soil is in bunds. We also request the soil bunds are kept clear of all weeds, to minimise weed pressure when the land is reinstated.	The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase,as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site. The applicant commits to working with the landowner where reasonable to do so to mitigate soil run off. Additionally, the applicant can confirm the Soil Stock Piling Methodology as set out in **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** within Chapter 8.5 Soil Stockpiling states that, "Topsoil and subsoil stockpiles will be seeded with a grassland seed mix to maintain slope stability and to prevent erosion or dust generation if they will be used for longer than six months (with other measures used as required, for example to limit dust generation, on stockpiles which will be in place for shorter periods); and soil stockpiles will be managed and monitored throughout their lifetime so that they can be maintained in relation to stability and integrity, and any weed growth can be managed in a timely manner"

Reference	Summary of relevant representation	Applicant's Response
		The Applicant will work with landowners on an ongoing basis to understand the nuances of land drainage. **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows: "*Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.*". Measure AS05 in the REAC commits to consultation with affected landowners to be carried out to investigate the current extent of land drainage which will be taken into account in the development of the Drainage Management Plan (see W14) prior to construction, with the intent of maintaining the efficiency of the existing land drainage system. This would be secured through **DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan** and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction. The appointment of a drainage contractor will feature as part of ongoing discussions with landowners and related compensation claims.
4.7.5	**Private Water Supplies** – This scheme will impact private water supplies running underground across the Estate. In the interest of highlighting these now, a plan is enclosed identifying the indicative location of these. We request National Grid, and its contractors ensure careful management of these, so not to disrupt supply to Estate and third-party properties.	The Applicant commits to the consideration of applying appropriate measures to identify and mitigate impacts to private utility supplies from ongoing discussions with the landowner. A register of all mitigation measures that National Grid will undertake as part of the Proposed Project are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of **Schedule 3 of the draft DCO (Application Document 3.1)**.
4.7.6	**Cable Depth** – The minimum soil cover to the top of the tile over the ducts should be 1.2 m in order to provide sufficient clearance for the land drainage and irrigations infrastructure, allowing the Estate to manage their land as they were pre-construction.	The Applicant has committed within the voluntary agreements to install underground cables at a minimum depth of 1.2 m where required, as a result of agricultural methodology. The Applicant's Land Agent has worked with the landowner to understand their farming practises and the project is able to accommodate a deeper cable in this location.
4.7.7	**Cropping** – As referred to above, the majority of the Estate's cropping is reliant on irrigation. How a field is irrigated is stipulated by the location of the mains, the hydrants, and the shape of the field. As a result of the scheme proposals, there will be part fields severed, or left with an awkward boundary, resulting in areas that may not be suitable for farming, or not be available to irrigate. In such circumstances, we would expect National Grid to compensate the Estate on whole field basis and not just on an area taken basis. We would also expect National Grid to compensate the Estate in establishing and maintain the cover crop in the severed areas, to prevent weed and pest build up. In addition, considering the damage a scheme such as Sea Link has on soil structure and quality, we request the Estate, if required at the time, has the right to establish and maintain a cover crop over the affected fields for a period of up to two years, in order to remediate the damage caused by the scheme and before establishing a commercial crop. Should this be a necessity at the time, National Gird will compensate the Estate for the loss of income and costs in establishing and maintaining the cover crops. **Farm Management** – The proposed scheme will dissect fields and the associated construction will involve track closures. This will have a significant impact on the day	The Applicant will engage with landowners prior to and throughout the construction of the scheme, with the aim of mitigating any losses incurred and ensuring practical solutions are implemented on the Estate where possible as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC).** The Applicant's land agents will work with landowners to identify specific accommodation works, such as the provision of cover crops and measures to reduce disruption to agricultural operations. Set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** access to and from residential, community and agricultural land uses will be maintained throughout the construction period or as agreed with landowner discussions. Where crossing points are not able to be installed, or where the landowner is unable to reasonably mitigate their losses, and where construction practises may cause short- or long-term disturbance to the soils or farming practices, the Applicant is committed to compensating these reasonable losses in accordance with the Compensation Code.

Reference	Summary of relevant representation	Applicant's Response
	to day running of the Estate, especially during harvest and lifting of root crops. We assume the Estate will be appropriately compensated in time and running costs associated with additional travel required.	
4.7.8	**Link Boxes** – We are naturally concerned with the potential number of link boxes along the cable route. We understand there will be a requirement for link boxes every 500 – 1,000 m, which in some cases may well be in the middle of arable fields. This will cause inefficiencies to farming and thus we request all link boxes are in field hedges, abutting hedgerows/roadsides and where they can't be, the link boxes are buried to a cover of 1.2 m to allow for uninterpreted farming going forward.	These comments appear to conflate Link Boxes (buried chambers) and Link Pillars (above ground cabinets). Without certainty about which type of joint is being referred to, the response addresses both types of linkage. Link Pillars only apply to the HVAC connection between the Saxmundham Converter and Kiln Lane Substation and will not apply along the HVDC cable route. The Applicant will work to ensure that Link Pillars are located near the edges of fields, where reasonably practicable, so as to minimise disruption to agricultural operations. The Link Boxes will be buried and a cover of up to 1.2 m could be agreed to those, however, the link pillars will have protective wooden fences above ground, as per the Design and Layout plans typical joint bay detail set out in the **Application Document 2.13 Design and Layout Plans [APP-037].**

~~Table 4.8~~ Table 4.8 Applicant's Response to the Relevant Representation of Dyas Farms (1988) Ltd

Reference	Summary of relevant representation	Applicant's Response
4.8.1	Representation of marsh farmers within Kent Sea Link Development Consent Order Land affected by the Development Consent Order The DCO limits are on grade 2 land on marsh farmed by five businesses covering 1500 hectares. All farmers impacted also farm on grade 1 land producing a variety of fresh produce including asparagus, salads, herbs, potatoes, peas and winter vegetables alongside other businesses such as farm shops and business units. Each farm is run to scale with crop storage, irrigation, equipment and staff tailored to land farmed, the cumulative impact across the businesses must be accounted for.	The Applicant thanks Dyas Farms Limited's for their engagement with the Proposed Project. The Applicant recognises the significance of the agricultural industry in the local economy and acknowledges the nature and extent of their enterprise and operations on land within the Order Limits.
4.8.2	Nature and vulnerability of land within the DCO The land within the DCO area is alluvial clay soil with unique characteristics that have not been understood within the DCO documents. The marshland, formed over centuries by sediment infilling the Wantsum Channel, consists of deep (up to 80m) alluvial clay deposits, resembling a "giant blancmange" with a thin, 1m solid crust. Fissures and channels have been established underground for a long period of time. This young, uncompressed clay has high shrink-swell capacity, causing significant expansion and contraction. A buried salt layer from its marine past risks surfacing and contaminating watercourses. Due to its unstable, plastic nature, this soil cannot be: - Stripped back and replaced, as it lacks structural integrity. - Heaped or stockpiled, as it becomes unmanageable and loses form. - Hold heavy loads as it collapses under weight. - Dug at depth and reformed, as it cannot reconsolidate - Excavated and filled with water for drainage ponds, left in anaerobic conditions under heavy weight, then returned to farmland. - Dug deeply without risking salination, excavation may expose and mobilise the salt layer. - Allowed to naturally drain after disturbing the fissures and channels under the soil. Archaeological pits excavated on the converter site in July 2024 for the Sea Link project, have not returned to their original condition, despite being returned to the farmer to continue farming. These pits, dug to depths of 1m -2m across 30–50m trenches, are expected to take over five years to consolidate. (Photos attached)	A preliminary ground investigation has already been undertaken for the Proposed Project which considered the geotechnical properties of the strata within the Order Limits to inform the preliminary design. A further ground investigation will be undertaken to inform the detailed design of the Proposed Project in accordance with commitment GH01 included within the **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. The potential pollution risks to watercourses during construction and operation of the Proposed Project have been assessed in **Application Document 6.2.3.5 Part 3 Kent Chapter 4 Water Environment [APP-064]**. These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Proposed Projects design. The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update **the Application Document Reference 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site and tailored to the specific site conditions. **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows: "Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these

Reference	Summary of relevant representation	Applicant's Response
		drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained." This would be secured through DCO Schedule 3, Requirement 6 **Onshore 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction. The Applicant has prepared a Flood Risk Assessment (**Application Document 6.8**, which includes an assessment of groundwater flood risk to the Project. The assessment is detailed in section 4.5 of the report, informed by Appendix D, and was informed by data collected from a number of sources, including Project specific groundwater monitoring data. The tidal influence on the River Stour is acknowledged in the Flood Risk Assessment (Application Document 6.8), at para 4.3.6, and paras 4.3.16 to 4.3.18. The FRA presents an assessment of the risk of flooding from the River Stour and the Minster Stream. Tidal surge capabilities of the River Stour and Minster Stream, not recorded. The potential pollution risks to watercourses during construction and operation of the Project are assessed in ES Chapter 4 Water Environment (**Application documents 6,2,2,4** and **6.2.3.4**). These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Projects design, for example, sustainable drainage measures to capture and treat runoff, and which are described and secured through inclusion in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) The Applicant has prepared a Qualitative Groundwater Risk Assessment present as **Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-171]** which includes discussion of groundwater levels including data from preliminary site specific ground investigation, and which acknowledges that groundwater levels are likely to be close to the ground surface within parts of the Order Limits. With respect to groundwater quality, **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** contains commitments that include measures to protect groundwater including GH02 (provision of Foundation Works Risk Assessment), GH08 (protocol for dealing with unexpected contamination) and GH09 (Hydrogeological Risk Assessment).
4.8.3	DCO Documents have not effectively demonstrated: 1) That the nature of the soil is understood, only desktop ALC surveys have been completed.	The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site.
4.8.4	2) Land drainage systems and integrated water courses have not been surveyed	**Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of**

Reference	Summary of relevant representation	Applicant's Response
		Environmental Actions and Commitments (REAC) [APP-342]) is as follows: "Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained." In order to deliver this commitment, surveys would be undertaken and landowners would be engaged with. This would be secured through DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.
4.8.5	3) Naturally high ground water and groundwater flooding, not recorded in documents	The Applicant has prepared a Flood Risk Assessment **Application Document 6.8 [APP- 292]**, which includes an assessment of groundwater flood risk to the Project. The assessment is detailed in section 4.5 of the report, informed by Appendix D, and was informed by data collected from a number of sources, including Project specific groundwater monitoring data
4.8.6	4) Tidal surge capabilities of the River Stour and Minster Stream, not recorded.	The tidal influence on the River Stour is acknowledged in the Flood Risk Assessment (**Application Document 6.8) (APP- 292**), at para 4.3.6, and paras 4.3.16 to 4.3.18. The FRA presents an assessment of the risk of flooding from the River Stour and the Minster Stream and sets out how the Project has been designed to be resilient to flooding, as well as a range of measures to prevent increasing flood risk.
4.8.7	5) Contamination of water courses, overall impact not assessed	The potential pollution risks to watercourses during construction and operation of the Project are assessed in ES Chapter 4 Water Environment (**Application documents 6,2,2,4** and **6.2.3.4) (APP-051 & APP-064**). These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Projects design, for example, sustainable drainage measures to capture and treat runoff, and which are described and secured through inclusion in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**)
4.8.8	6) Impact on irrigation and reservoirs to businesses, not assessed	The Applicant has worked with landowners to identify private irrigation systems, where these are known they have been included within the design as utility interfaces. **Document 6.2.1.4 Description of the Proposed Project paragraphs 4.6.32 to 4.6.36 [AS-093].** Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (APP-341)**. This includes measure AS04 which states that existing water supplies for livestock and irrigation will be identified pre-construction. Where supplies will be lost or access compromised by construction works, temporary alternative supplies will be provided. Water supplies will be reinstated following construction. Known reservoirs have been identified and have been excluded from the Order Limits where possible.
4.8.9	7) Environmental schemes (missing from maps and documents). Not recorded on documents.	The comments here do not specify a particular type of environmental scheme, although it is noted that Higher Level Stewardship (HLS) schemes (referenced in other Relevant Representations from this area) are intended to maintain, improve or create habitats and can contribute positively to local landscape character. HLS schemes are not, however, considered to be a receptor of environmental impact and therefore have not been specifically assessed in the ES. Impacts upon any habitats maintained, improved or created under HLS are considered in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]**. Any impacts upon landscape character are reported in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**. The Applicant can confirm they are complying with The Compensation Code and losses associated with either the derrogation or termination of any stewardship agreements can be claimed for under this code. The Applicant's Land Agents are working with landowners (and

Reference	Summary of relevant representation	Applicant's Response
		their agents) who are potentially affected by losses to ensire claims are compliant with this Code.
4.8.10	8) Risk of unexploded bombs being discovered at depth, a safety procedure for working nearby to be made clear. (WW2 bombs are still active as seen in Cologne this week where 22,000 people were evacuated.	The Applicant has undertaken UXO risk assessments for the site and is aware of the risk posed. Further survey and investigation works will be undertaken as part of the proposed development. The Applicant will be liaising with the emergency services to confirm emergency procedures in the event of finding any suspected UXOs during the works.
4.8.11	9) Safety of farm drones weighing 50kilos working alongside unknown moving equipment.	The Applicant acknowledges concerns on farm safety. The Applicant's Land Agents will work with the landowner to ensure we can work collaboratively to help mitigate any losses. The applicant commits to detailing these requirements within an accommodation work register to be shared with the Main Works Contractor which will include reference to sharing of GIS boundary data where appropriate to allow drones to be reprogrammed to take into account the working width.
4.8.12	10) Explanation of the 200,000 tonnes of additional aggregate being brought in to raise the converter station site, risk of contamination via material run off and invasive species.	Earthworks including the import of fill will be undertaken in line with BS 6031 Code of Practice for Earthworks and the Specification for Highways Works CC 601 Earthworks (formerly Series 600), in line with the Applicants technical standards. The imported fill will need to meet the specification of the detailed design to be deemed acceptable to be delivered to site, acceptability will be determined through rigorous testing in line with national standards and codes of practice, including assessing sources for invasive species. The control of earthworks or materials movement (including any re-use of materials) would be under appropriate Environmental Permits, exemptions or Contaminated Land: Applications in the Real Environment (CL:AIRE) 'The definition of Waste: The development industry Code of Practice (2011) as set out in the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342)**
4.8.13	Equitable requirements: 1) An independent condition and assessment pre and post works	The applicant commits to completing pre and post work record of conditions as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342], paragraph GG06.** A full photographic/aerial footage and descriptive record of condition (pre condition survey) will be carried out prior to commencing construction activities. This record will be available for comparison following completion of reinstatement works**. Document Number 7.5.10.2 Outline Soil Management Plan – Kent, Paragraph AS01 Agriculture and Soils** within the above reference document confirms the specific guidance in relation to soil handling, including, soil stripping, soil stockpiling and soil reinstatement. These will be updated to Soil Management Plans prior to construction, to include information from soil and agricultural land classification (ALC) surveys. Measures will include but not be limited to the following: pre-construction surveys in accordance with published guidance to confirm ALC grade and soil type; specific measures for managing sensitive soils
4.8.14	2) Inaccessible areas of farmland to be compensated, specifically around the converter station – it is clear on the maps these areas are not accessible, yet they are expected to be farmed.	Set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** access to and from residential, community and agricultural land uses will be maintained throughout the construction period or as agreed with landowner discussions. The Applicant is committed to, where appropriate, compensating these losses in accordance with the Compensation Code, if practical mitigation methods are unavailable or not suitable.
4.8.15	3) A clear process for damage repairs and follow up. National Grid to provide a contractor to repair if requested. For all aspects of the farm including tracks. We	The Applicant commits to completing pre and post work record of conditions as per **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and**

Reference	Summary of relevant representation	Applicant's Response
	have not yet experienced the "aftercare management plan" mentioned in the documents, despite survey damage	**Commitments (REAC) (APP- 342)** paragraph GG06, full photographic/aerial footage and descriptive record of condition (pre-condition survey) will be carried out of the working areas that may be affected by the construction activities prior to these works commencing. This record will be available for comparison following completion of reinstatement works to ensure that the standard of reinstatement at least meets that recorded in the pre-condition survey. Should the landowners wish to make a claim for any works they believe are not in line with the records of condition, the Applicant confirms they are complying with the Compensation Code and an application for compensation can be made in line with that
4.8.16	4) Full soil surveys, showing understanding of soil nature, method of repairs, high ground water, fissure maps, salt layer, water courses and reservoirs.	The Applicant has made the commitment for the completion of Agricultural Land Classification (ALC) and soils surveys during the examination phase, following appropriate Unexploded Ordnance (UXO) risk assessment and implementation of the required mitigation measures. The information gained from these surveys will be used to update **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** where necessary and soil handling measures can be updated based on confirmation of the soils identified on site.
4.8.17	5) Ariel land drainage plan survey pre and post.	Within Paragraph W10 of **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** , "Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained". The applicant has committed to appointing a land drainage consultant. Within Paragraph AS05 of the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP- 342)** it states that Consultation with affected landowners will be carried out to investigate the current extent of land drainage which will be taken into account in the development of the Drainage Management Plan (see W14) prior to construction, with the intent of maintaining the efficiency of the existing land drainage system. A detailed drainage survey comprising of intrusive and non intrusive methodology will take place ahead of design and installation of a land drainage mitigation scheme. The applicant acknowledges the concerns on land drainage. The specific wording of W10 (from **Application Document 6.4.3.4 ES Figures Kent Water Environment [APP-263]** covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. This would be secured through **DCO Schedule 3, Requirement 6**. The detail can be found in **Application Document 7.5.3.1 CEMP Appendix A - Outline Code of Construction Practice [APP-341**] and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.
4.8.18	6) Fair consideration for the length of time for re-establishment of soil – proposed 5 years minimum	**Application Document 7.5.10.2 Outline Soil Management Plan – Kent (APP-355)** sets out the outline approach to the handling and reinstatement of soils on the project. Paragraph 8.7 of this document details that an Aftercare Management Plan will be produced by the Contractor which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by the monitoring. **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342).** Within this document, the Agriculture and Soils section commits the applicant to communicate with the landowners. Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be

Reference	Summary of relevant representation	Applicant's Response
		recreated. This is secured by measure AS02 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].**
4.8.19	7) Clear guidelines with Natural England and DEFRA regarding environmental schemes, long term impacts to scheme renewals which are due during works and force majeure of contract agreements. A wildlife and habitat re-instatement scheme will be required after works. Inability for farmers to take on new environmental schemes due to development works.	Potential biodiversity impacts are considered in **Application 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent (PDA-035) sets out the proposed landscape and ecological reinstatement proposals. The presence of Higher Level Stewardship land is not considered relevant to the EIA assessment. The Applicant can confirm they are complying with The Compensation Code and losses associated with either the derogation or termination of any stewardship agreements can be claimed for under this code. The Applicant's Land Agents are working with landowners (and their agents) who are potentially affected by losses to ensure claims are compliant with this Code.
4.8.20	8) Clear method for farmers to claim for crop loss and damage to business (previous National Grid works have left farmers unable to claim for damage and crop loss due to lengthy disputes)	The Applicant can confirm that there is a publicly available document, National Grid's Land Rights Strategy and Payment Schedule for Assets which sets out the basis of payment for additional compensation claims. Additionally, the Applicant's Land Agents are working closely with all landowner's and their Land Agents on the scheme and are reviewing claims in line with the Compensation Code. The Applicant can confirm that the Landowner's on the scheme are represented by RICS qualified land agents and are able to receive advice on how to claim, from their own agents. The Applicant can also confirm that reasonable Agents Fees are being reimbursed so the affected Landowners are able to be represented appropriately.
4.8.21	9) Cumulative impact across businesses	The applicant would like a little more context for this comment to allow a full answer to be provided. Both intra-project and inter-project cumulative effects have been assessed and are reported within **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP073]** respectively. In the meantime, the Applicant Land Agents are working with the landowners and their agents to help mitigate the impact of the project on the farms.
4.8.22	10) Farm drone safety assessment	The Applicant acknowledges concerns on farm safety. The Applicant will work with the landowner to ensure we can work collaboratively to help mitigate any losses. The applicant commits to detailing these requirements within an accommodation work register which will include reference to sharing of GIS boundary data where appropriate to allow drones to be reprogrammed to take into account the working width.
4.8.23	11) Details of aggregate imported and cleaning procedure	Earthworks including the import of fill will be undertaken in line with BS 6031 Code of Practice for Earthworks and the Specification for Highways Works CC 601 Earthworks (formerly Series 600), in line with the Applicants technical standards. The imported fill will need to meet the specification of the detailed design to be deemed acceptable to be delivered to site, acceptability will be determined through rigorous testing in line with national standards and codes of practice. Should cleaning, treatment or processing of the source material be required to make it acceptable then details procedures will be developed and monitored to ensure these activities are undertaken. The control of earthworks or materials movement (including any re-use of materials) would be under appropriate Environmental Permits, exemptions or Contaminated Land: Applications in the Real Environment (CL:AIRE) 'The definition of Waste: The development industry Code of Practice (2011) as set out in the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342)**

Reference	Summary of relevant representation	Applicant's Response
4.8.24	12) UXO safety assessment and alert process (proximity of battery and methane plants taken into account)	The Applicant has undertaken UXO risk assessments for the site and is aware of the risk posed. Further survey and investigation works will be undertaken as part of the proposed development. The Applicant will be liaising with the emergency services to confirm emergency procedures in the event of finding any suspected UXOs during the works.
4.8.~~24~~25	Marsh farmers within Sea Link DCO Struan Robertson, Peter Smith, Anthony Curwen, Mathew Spanton, Guy Smith, James Southorn, Nicola Dyas, Pippa Southorn. Attachment: Photos Signed: Nicola Dyas Nicola Dyas Dyas Farms 1988 Ltd Dated 20/06/2025 Photos: 1. Damage after archaeology survey at converter site, that was handed back to continue farming as normal, pits are the brown strips in photos, each pit now contains slumped soil that can not be travelled over, 2. Attempting to continue farming operations when tractor sunk in archaeological pit.	The Applicant acknowledges the response is on behalf on multiple landowners. Some of whom have also provided individual Relevant Representation responses that the Applicant has responded too. The Applicant's agent, Dalcour Maclaren, have engaged with interested parties individually in relation to the land rights being sought. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**

~~Table 4.9~~ Table 4.9 Applicant's Response to the Relevant Representation of Elgars on behalf of John Collins

Reference	Summary of relevant representation	Applicant's Response
4.9.1	I act as agent on behalf of John Collins, a farmer who owns and occupies land that will be affected by this project.	The Applicant acknowledges Mr Collins' relevant representation and confirms that the landowner has interests in land plots in Kent: 2/23 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/24 - Class 6. Compulsory Acquisition of Rights - Drainage 2/27 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/28 - Class 5. Compulsory Acquisition of Rights - Access 2/29 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/30 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/32 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/36 - Class 6. Compulsory Acquisition of Rights - Drainage 2/39 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/40 - Class 5. Compulsory Acquisition of Rights - Access 2/41 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/42 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/88 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure The land is primarily required for the turning of the existing overhead line into the proposed new substation in Kent. The Applicant's agent, Dalcour Maclaren, have engaged with Mr Collins and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued on 4th March 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Collins' agent in August 2025. Dalcour Maclaren are continuing to make attempts to engage with the landowner and their agent and have written to Mr Collins' agent on 6th November 2025 to seek further engagement. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.9.2	His land is farmed for the benefit of the environment and is included in a Countryside Stewardship Scheme. If this scheme goes ahead not only will he and the environment be affected by the overhead powerlines that will be erected on his land but the also by the massive intrusion into the landscape of the proposed convertor station that will also have significant detrimental effects on the environment.	The Applicant will continue to engage with landowners on current and future agri-environmental schemes to mitigate losses and disturbance. The Applicant believes that post construction, the Countryside Stewardship scheme and the Overhead line can co-exist. The Applicant is complying with the Compensation Code. Landowners are entitled to financial compensation for losses incurred in relation to the derogation of agri- environment agreements, or for the termination of stewardship agreements if that is reasonable. The Applicant's Land Agents will continue to liaise with the landowners to ensure that any potential losses are able to be mitigated.
4.9.3	My client is also concerned that there has not been enough public debate by National Grid about alternative locations for landfall and the convertor station which would be better situated in an industrial or semi industrial area or where	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]**

Reference	Summary of relevant representation	Applicant's Response
	improvements can be made to existing land based National Grid or other electrical conversion already occurs.	which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. The Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory' standard to the Secretary of State. The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the **Notification of Decision to Accept Application [PD-001]** issued on behalf of the Secretary of State on 23 April 2025 The detailed explanation behind the connection location for the Proposed Project, the assessment of feasible alternatives that were considered, how the Applicant has coordinated with other projects and a complete project description is contained in: **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** **Application Document 7.2 Strategic Options Back Check Report [APP-320];** **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044];** **Application Document 7.10 Coordination Document [APP-363];** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].** The reports listed above outline the range of options and reasonable alternatives that were considered in the development of the Proposed Project. This includes consideration of brownfield sites and the reasons for them being discounted. It is also noted that the Minster Converter Station and Substation would be located near to the on the edge of the Landscape Character Area (LCA) E1: this part of the LCA exhibits some differing characteristics to the wider marshland further to the west, reducing the alteration to the key characteristics of the LCA. Due to the location on the edge of the marshes, the operational infrastructure is considered to impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics would remain largely unaffected as they are either not present in the baseline or are conserved. The impacts of the Proposed Scheme on the Landscape are assessed in the **Landscape and Visual Chapters** of the **Environmental Statement [APP-048** and **App-061]** assess the impacts of the Converter Stations and does not identify any unacceptable impacts.
4.9.4	Neither he our myself feel that the approach made by National Grid to secure his agreement to an option for the grant of the rights they need if the DCO goes ahead were fair or democratic as they required him to waive his rights to comment against a scheme that he has a right to object to.	The Heads of Terms and land option agreement will be negotiated outside the examination forum and the approach taken aligns with those of other developers for transmission assets of offshore wind infrastructure. Where landowners are willing to enter into a voluntary agreement it is standard practice for there to be a reciprocal obligation not to object to the project. A recent Court of Appeal decision in relation to the Suffolk Energy Action Solutions SPV Ltd, R (On the Application Of) v Secretary of State for Energy Security and Net Zero (2024) EWCA Civ 277 (22 March 2024) found the use of non-objection clauses in this context to be permissible.

Table ~~4.10~~ 4.10 Applicant's Response to the Relevant Representation of Elgars on behalf of Richborough Estates Ltd

Reference	Summary of relevant representation	Applicant's Response
4.10.1	I act as agent on behalf of Richborough Estates Ltd who own and occupy land that will be affected by this project.	The Applicant acknowledges Richborough Estates Ltd's land interest in plots (Kent): 2/125 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure and 2/126 - Class 2. Compulsory Acquisition of Rights - Overhead Line. Land primarily required for the overhead line into the proposed new substation in Kent. The Applicant's agent, Dalcour Maclaren, have engaged with Richborough Estates and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued on 04th March 2025 and subsequently revised versions of the Heads of Terms were issued to Richborough Estates' agent in August 2025. Dalcour Maclaren are continuing to make attempts to engage with the landowner and their agent and have written to Richborough Estates' agent on 06th November 2025 to seek further engagement. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.10.2	Their land immediately adjoins the site of the proposed convertor station and is all included in the Sandwich Bay to Hacklinge Marshes SSSI. In particular their site includes one of the few areas of woodland on the Ilse of Thanet and this is immediately adjacent to the site of the proposed convertor station.	Effects on the woodland component of Sandwich Bay to Hacklinge Marshes SSSI and its breeding bird interest (the reason for SSSI designation) have been assessed in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]** and discussed with Natural England. A 60dB noise disturbance threshold was agreed and a series of mitigation measures introduced to ensure this is not breached during the sensitive season. This includes noise reduction techniques to reduce noise to an acceptable level over as much of the site as possible and programming works that would increase noise levels at Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) above 60dB to avoid the bird nesting season of March to June. The use of best practicable methods to reduce noise is commitment B44 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**, while a commitment to a seasonal restriction, as identified above, is in commitment B51 of the same document.
4.10.3	If this scheme goes ahead not only will their land and the environment be affected by the overhead powerlines that will cross over part of the SSSI but the also by the closeness and massive intrusion into the landscape of the proposed convertor station that will also have significant detrimental effects on the environment in general but the woodland in particular.	Embedded measures that have been integral in reducing, and where possible avoiding, the landscape and visual effects of the Proposed Project. These include the principles of the landscape strategy for the converter station and substation site (**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**) and the design of the converter station and substation, in terms of their building form and external materials **Application Document 7.11.2 Design Approach Document – Kent [APP-365]** and **Application Document 7.12.2 Design Principles – Kent [APP-367]**). The outline landscape strategy **[Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** seeks to respond to both the immediate landscape pattern of the site as well as the wider landscape character. The strategy proposes to use native woodland planting to provide structural screening to the converter station and substation in views from the north and northwest whilst providing containment to the converter station and substation site so that it appears visually connected to the Richborough Energy Park, rather than the wider marsh landscape. In terms of impacts upon nearby woodland, Application Document **6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]** identifies that one moderate quality woodland tree is likely to be removed to facilitate the Proposed Project, detailed in Appendix D Tree Survey Schedule Kent Onshore Scheme and Appendix F Tree Protection Plans Kent Onshore Scheme. Where practicable the detailed design will be further developed to avoid or minimise impacts to trees.

Reference	Summary of relevant representation	Applicant's Response
		The final level of arboricultural impacts will be assessed and recorded as part of an Arboricultural Method Statement which will be secured via the DCO Schedule 3 Requirement 8 (**Application Document 3.1**). This document has been superseded by **AS-087**.
4.10.4	My client is also concerned that there has not been enough public debate by National Grid about alternative locations for landfall and the convertor station which would be better situated in an industrial or semi industrial area or where improvements can be made to existing land based National Grid or where other electrical conversion already occurs.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. The Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory' standard to the Secretary of State. The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the **Notification of Decision to Accept Application [PD-001]** issued on behalf of the Secretary of State on 23 April 2025 The detailed explanation behind the connection location for the Proposed Project, the assessment of feasible alternatives that were considered, how the Applicant has coordinated with other projects and a complete project description is contained in: **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** **Application Document 7.2 Strategic Options Back Check Report [APP-320];** **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044];** **Application Document 7.10 Coordination Document [APP-363];** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].** The reports listed above outline the range of options and reasonable alternatives that were considered in the development of the Proposed Project. This includes consideration of brownfield sites and the reasons for them being discounted. It is also noted that the Minster Converter Station and Substation would be located near to the edge of the Landscape Character Area (LCA) E1: this part of the LCA exhibits some differing characteristics to the wider marshland further to the west, reducing the alteration to the key characteristics of the LCA. Due to the location on the edge of the marshes, the operational infrastructure is considered to impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics would remain largely unaffected as they are either not present in the baseline or are conserved. The impacts of the Proposed Scheme on the Landscape are assessed in the **Landscape and Visual Chapters** of the **Environmental Statement [APP-048** and **App-061]** assess the impacts of the Converter Stations and does not identify any unacceptable impacts.
4.10.5	Neither he our myself feel that the approach made by National Grid to secure his agreement to an option for the grant of the rights they need if the DCO goes ahead were fair or democratic as they required him to waive his rights to comment against a scheme that he has a right to object to.	The Heads of Terms and land option agreement will be negotiated outside the examination forum and the approach taken aligns with those of other developers for transmission assets of offshore wind infrastructure. Where landowners are willing to enter into a voluntary agreement it is standard practice for there to be a reciprocal obligation not to object to the project. A recent Court of Appeal decision in relation to the Suffolk Energy Action Solutions SPV Ltd, R (On the Application Of) v Secretary of State for Energy Security and Net Zero (2024) EWCA

Reference	Summary of relevant representation	Applicant's Response
		Civ 277 (22 March 2024) found the use of non-objection clauses in this context to be permissible.

~~Table 4.11~~ Table 4.11 Applicant's Response to the Relevant Representation of Elgars on behalf of Hilda Mary Chaston

Reference	Summary of relevant representation	Applicant's Response
4.11.1	From the map it seems that part of the property (Redacted) will be needed for access. (The southwestern corner where a track gives access to the existing pylons). I am next of kin and attorney for Mrs. Chaston. I wish to register to ensure that I am kept fully up to date with the project and how it affects my mother's property.	The Applicant thanks Mrs Chaston and her son for their representation and will be pleased to arrange a meeting with them to discuss the proposed project and the land rights sought for the project. The applicant confirms the landowner has an interest in land plot 3/1 (Suffolk) - Class 5. Compulsory Acquisition of Rights – Access.

~~Table 4.12~~ Table 4.12 Applicant's Response to the Relevant Representation of Elgars on behalf of Ian Mather

Reference	Summary of relevant representation	Applicant's Response
4.12.1	This project will have serious detrimental effect on my historic property and the ruin the environment around me. Also The Great Oaks small school will be forced to close on the site. They have been operating a brilliant school for over 20 years that has benefited hundreds of disadvantaged children.	The Applicant welcomes the respondent's engagement with the Proposed Project. The Applicant confirms Mr Mather has an interest in land plots in Kent; 2/149 - Class 7. Compulsory Acquisition of Rights – Mitigation 2/148 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 2/152 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/16 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/17 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/19 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 4/18 - Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/150 - Class 7. Compulsory Acquisition of Rights - Mitigation 2/133 - Class 1. Compulsory Acquisition of Land 2/144 - Class 7. Compulsory Acquisition of Rights - Mitigation 2/147 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 2/154 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 2/145 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 2/132 - Class 1. Compulsory Acquisition of Land 4/14 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 2/153 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/146 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 5/29 - 4/29 - Class 3. Compulsory Acquisition of Rights – Underground Cable System.
4.12.2	This project will have serious detrimental effect on my historic property and the ruin the environment around me.	All heritage assets where the Kent Onshore Scheme has the potential to result in impacts were identified in Section 6 'Assessment of Heritage Significance' of **Application Document 6.3.3.3 ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**. This assessment noted where there was the potential for significant impacts, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 'Conclusions' of the **Application Document 6.3.3.3 ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**. The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Kent Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of **Application 6.2.3.3 Part 2 Chapter 3 Cultural Heritage [APP-063]**. The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in **Application Document 7.12.2 Design Principles – Kent [APP- 367].** Design Principles CO.2 in Table 3.1 of APP-367 sets out the need to design the Minster Converter Station in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of Application Document 7.12.2 Design Principles – Kent [APP- 367] is secured through Schedule 3 Requirements 3 of the DCO.

Reference	Summary of relevant representation	Applicant's Response
4.12.3	Also, the Great Oaks small school will be forced to close on the site. They have been operating a brilliant school for over 20 years that has benefited hundreds of disadvantaged children.	Concerns about the potential impacts upon Great Oaks Small School are acknowledged. However, as indicated in the Applicant's response to the Great Oaks Small School Relevant Representation, the Proposed Project incorporates measures to minimise, control and mitigate effects that may be perceived as being detrimental to the school. These include measures to control noise and vibration, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Outline Noise and Vibration Management Plans (Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent [APP-351]).** Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by **Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-012].**
4.12.4		The Applicant's agent, Dalcour Maclaren, have engaged with Mr Mather and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued on 6 March 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Mather's agent in August 2025. Dalcour Maclaren have continued discussions with Mr Mather's agent regarding the Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**

~~Table 4.13~~ Table 4.13 Applicant's Response to the Relevant Representation of Jill Stuchfield

Reference	Summary of relevant representation	Applicant's Response
4.13.1	I am not in principle against the project and I understand the logic of connecting Suffolk to Kent to enable electricity to flow in both directions around the outer-London ring.	The Applicant thanks Mrs Stuchfield for their representation. The Applicant will continue to engage in respect of the land rights required to facilitate the proposed project and acknowledges that both Mr and Mrs Stuchfield have made relevant representations as joint landowners. RR reference – 4009 provided by Mr Stuchfield. The Applicant confirms Mrs Stuchfield has an interest in land plots in Suffolk- 5/33 - Class 3. Compulsory Acquisition of Rights - Underground Cable System. The Applicant's agent, Dalcour Maclaren, have engaged with Mrs Stuchfield and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Mrs Stuchfield's agent on 15 April 2025 and 22 August 2025. Dalcour Maclaren have continued discussions with Mrs Stuchfield's agent regarding the Heads of Terms. Dalcour Maclaren emailed Mrs Stuchfields agent on 10 September 2025 and 15 October 2025 requesting a meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**
4.13.2	However: The location of the Converter station (in Saxmundham) significantly further inland than the Substation in Friston seems to be illogical, requiring several kilometres of additional cabling. (I am not convinced by the realism of moving these two pieces of switching infrastructure offshore on the grounds of cost.) The location of the land-fall of the cable, though far from ideal personally, does not seem illogical either (though there might be less environmentally sensitive land-fall locations available).	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. The evolution of the Proposed Project and the rationale underlying the selection of Saxmundham as the preferred location for its converter station is described in **Corridor Preliminary Routeing and Substation Siting study** [**APP-368**]. This process was the subject of extensive public consultations as set out in the **Consultation Report** [**APP-301]**. Reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**. The Applicant's duties and obligations involve balancing the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered. **Application Document 7.3 Design Development Report [APP-321]:** Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for.

Reference	Summary of relevant representation	Applicant's Response
		Application Document 8.1 Corridor Preliminary and Routeing and Siting Study (October 2022) [APP-368]: Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. These documents set out the many factors considered in identifying site options and selection of a preferred option.
4.13.3	Discussions with members of the NGET project team and its agents suggest that the disruption to our lives and the peaceful enjoyment of our home will be immense. We have been informed that there will be not one but 2 construction compounds (one for the tunnel-boring for the seaward cable, and one for the trench-digging for the landward cable) both tightly positioned against our garden fence. These will result in light pollution, noise pollution, dust, refuse and the despoliation of the beautiful view, the peace and tranquility of which were the major reason for our buying here in 2009. Whilst these very significant nuisances may be temporary (18-months is the timescale we have been led to expect), my husband and I have little confidence that the project team understands or cares greatly about the ruination of our life for the duration of the project (not to mention the blight, stress and hassle of preparing for it and negotiating any relief).	The Applicant acknowledges the concerns of the landowner and has assessed the potential amenity impacts in this area and upon wider community receptors in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. The assessment considers potential effects such as noise, dust, traffic, and visual disturbance that could influence health and wellbeing. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on residents and local community assets arising from construction of the Suffolk Onshore Scheme. The Study Area used in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** cover the local wards of Saxmundham and Aldeburgh & Leiston within East Suffolk, which encompass smaller settlements. This ensures that residents and landowners within and immediately surrounding the construction footprint are included in the assessment. The methodology adopted a holistic but locally sensitive approach, considering potential effects on both the wider community and those located closest to construction activities. Accordingly, the assessment presented in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** fully captures and addresses potential localised effects on nearby landowners, and the conclusions remain valid and proportionate. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in **CEMP Appendix A Code of Construction Practice [APP-341]** and the **CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** to reduce the potential for adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. In relation to air quality effects, the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [APP-346]** outlines the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively. In relation to noise and vibration effects, **Application Document 7.5.8.1 Outline Noise and Vibration Management Plan - Suffolk [AS-132]** (NVMP) outlines the proposed construction

Reference	Summary of relevant representation	Applicant's Response
		noise and vibration management and mitigation measures. The NVMP will be updated by the contractor(s) prior to and during the works based on their specific methodologies and mitigation measures. The Applicant notes these concerns and is committed to working with the landowner to apply accommodation works to mitigate disruption where possible. The Applicant's Land Agent is in contact with this landowner and will compile a list of actions the Main Works Contractor will need to enact in order to help mitigate the effect of this project on the landowner.

~~Table 4.14~~ Table 4.14 Applicant's Response to the Relevant Representation of Lindsay Peter Tomlinson

Reference	Summary of relevant representation	Applicant's Response
4.14.1	I am the owner of (Redacted) and I object to National Grid's Sea Link plans My wife and I own the house and two adjacent fields.	The Applicant thanks Mr Tomlinson for their representation and will continue to engage in respect of the land rights required to facilitate the proposed project. The Applicant confirms Mr Tomlinson has an interest in plots in Suffolk; 5/30 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/23 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/31 - Class 6. Compulsory Acquisition of Rights - Drainage 5/22 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/24 - Class 6. Compulsory Acquisition of Rights - Drainage 5/25 - Class 5. Compulsory Acquisition of Rights - Access 5/20 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/2 - Class 6. Compulsory Acquisition of Rights - Drainage 5/18 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/1 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/15 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/17 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 5/19 - Class 5. Compulsory Acquisition of Rights - Access The Applicant's agent, Dalcour Maclaren, have engaged with Mr Tomlinson and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Tomlinson's agent in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Tomlinson's agent on 15th April 2025 and 22nd August 2025. Dalcour Maclaren have continued discussions with Mr Tomlinson's agent regarding the Heads of Terms. Dalcour Maclaren emailed Mr Tomlinson's agent on 10th September 2025 and 15th October 2025 requesting a meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.
4.14.2	Sea Link plans to put cables through our fields and to use the fields for a construction compound and access roads.	The reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**. The Applicant's duties and obligations involve balancing the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. The Applicant is complying with The Compensation Code and will be working with this landowner to ensure that any reasonable and properly mitigated losses incurred in relation to

Reference	Summary of relevant representation	Applicant's Response
		the scheme are compensated for, in line with the scheme. The Applicant is committed to working with this landowner through their Land Agent to ensure the impact of this project is mitigated and any accommodation works required are listed and submitted to the contractor for action.
4.14.3	National Grid's copious Sea Link documentation acknowledges the serious adverse impact on (Redacted) - a Grade 2 Listed Property. The disruption to us will be severe.	All assets where the Suffolk Onshore Scheme has the potential to result in impacts were identified in Section 6 'Assessment of Heritage Significance' of the Cultural Heritage Baseline Report (**Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**). This assessment noted where there was the potential for significant effects, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 'Conclusions' of the Heritage Baseline Report (**Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**). The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].** The Applicant understand the property referred to in this comment to be Grade II listed Gorsehill (NHLE 1269753). As explained in **APP-050**, the assessment of setting impacts is limited to permanent impacts resulting from the operational phase. As such, the assessment on setting is limited to assets within 2km from the proposed 'above ground permanent infrastructure' such as the converter station and substation. With this in mind, Grade II listed Gorsehill is located more than 2km from the proposed above ground infrastructure and therefore it is outside the scope of the assessment. The suggestion that the Applicant acknowledges a serious adverse impact on this heritage asset is therefore not correct.
4.14.4	It is clear to us that the UK should be constructing an integrated offshore grid, making landfall on brownfield sites closer to London, rather than despoiling the Suffolk Heritage Coast.	It is recognised that In Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station. This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide. In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. Details are set out in the following documents: • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. • **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered. • **Application Document 7.3 Design Development Report [APP-321]**: Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for.

Reference	Summary of relevant representation	Applicant's Response
		• **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]:** Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. • **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation
4.14.5	Our particular concerns are as follows: Destruction of Internationally Important Wildlife Havens The Suffolk Heritage Coast is a wonderful unspoilt area, a haven for wildlife and an internationally important bird sanctuary. We have been regular visitors since the 1950s and love the tranquility of the area and the abundance of birds, deer and other fauna. It is astonishing that the UK should choose to locate its new energy infrastructure in such a significant wildlife haven. Other European countries are building their new energy infrastructures offshore and on brownfield sites. The UK should do the sane.	The ecological interest of the Suffolk Coast has been a key feature informing the development of the project. Due to its ecological importance, there will be no open trenching or surface construction works within RSPB North Warren Nature Reserve, Sandlings Special Protection Area or Leiston-Aldeburgh SSSI. Instead, this section of route will be installed using trenchless methods. Moreover, a 60dB disturbance threshold for bird interest has been agreed with Natural England, noise reduction techniques have been incorporated into the project to minimise the area exposed to noise above these levels, and works that are forecast to result in noise exceeding this threshold within the SPA have been programmed to avoid the nightjar and woodlark nesting season. Detailed hydrogeological investigations have been undertaken to establish that the drill will not affect surface water levels in the RSPB reserve due to its depth, and the cables will be too deep to affect its future management. The assessment of effects is set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]** and the Applicant is cognisant of the concerns raised in these comments, with extensive surveys, including ground investigation works, informing decision-making. The Proposed Project incorporates measures to minimise the impacts of construction work. This is set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
4.14.6	Cumulative Impact of Uncoordinated Projects Sea Link is just one of a host of projects. In the last 3 years we have seen proposals relating to Sea Link, Nautilus, Euro Link, Lion Link etc. Sizewell C sits in the background. There seems to be little coordination between the projects and not much oversight from our elected representatives. National Grid seems to be in total control and is able to make commercial decisions which take little note of the destruction of heritage and wildlife assets. The cumulative impact of all of this is quite overwhelming.	In developing the Proposed Project, the Applicant's duties and obligations involve balancing the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. The Applicant has committed significant resources to engagement with Host Authorities in Suffolk and affected landowners, aiming to gather a wide range of feedback and ensure that all voices are heard before any decisions are finalised. Furthermore, the Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory standard for the planning inspectorate to accept the application for examination'. The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the Notification of Decision to Accept Application [PD-001] issued on behalf of the Secretary of State on 23 April 2025. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects** [**APP-060**] of the ES assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects. The Applicant has produced a report on coordination which covers how it approached coordination with other project with the aim of reducing the impact on the environment and location communities, see **Application Document 7.10 Coordination Document [APP-363].** This Document demonstrates that coordinated approaches to consenting; site and routing

Reference	Summary of relevant representation	Applicant's Response
		selection; design; and delivery of the Proposed Project with other proximate projects has been considered appropriately and has been, and can be, achieved where practicable. The Applicant has further engaged with NGV, SPR, Sizewell C Ltd and other developers, both individually and collectively at East Suffolk Council's quarterly strategic energy projects update meeting to explore opportunities for collaboration and coordination and will continue to do so. With regard to other subsea cable projects proposing to make landfall in this area, there has been regular ongoing dialogue with NGV, comprising fortnightly project team meetings and frequent additional issue-specific meetings. This has focused on the coordination and co-location of Sea Link with what was initially up to two NGV interconnector projects (LionLink and Nautilus), including converter station co-location and design, mitigation, and cable routing. This dialogue has included a joint routing & siting exercise, and ongoing discussion and information sharing to inform the respective emerging designs of each project. As noted above, the potential effects of the Proposed project have been carefully considered in the ES and informed by extensive survey work, resulting mitigation measures to minimise the impacts of construction work and operation, set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
4.14.7	Time Horizons We are told that the landscape will be restored on project completion, which may or may not be the case. In any event the various projects will continue for at least 10-20 years. This will cover most if not all of our remaining lifetimes, which is an unappealing prospect. Furthermore, we are seriously concerned about our trees, many of which lie on the route of the proposed cables. If those trees are felled their replacements will take at least 50 years to mature. Quite simply, at a personal level we will never see our property restored to anything like its current condition.	The Applicant's duty is to balance the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. This duty underlies decision-making process at every stage of project progress. The proposed HVDC cable route has been assessed as part of the Suffolk Onshore Scheme for all identified landscape and visual receptors, as detailed within the landscape assessment appendix **(Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097])** and the visual assessment appendix **(Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098])**. The removal of vegetation to facilitate cable laying has been considered within the Landscape and Visual Impact Assessment (LVIA) for both landscape and visual receptors, including within the Suffolk Coast and Heaths AONB where it is acknowledged within the assessment that some types of habitats such as acid grassland would take longer to recover. This has also been considered cumulatively with other projects, for example at construction it is acknowledged that there are potentially significant effects on the Suffolk Coast and Heaths AONB due to the associated construction activity being a temporary feature in the landscape when considering the total cumulative effects of Sizewell C, EA1N and EA2 and LionLink **(Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060])**. These total cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated. However, it is acknowledged that mitigation planting will take time to mature. The applicant acknowledges the concerns raised regarding the loss of landscape and the impact on the property. The project will work closely with the landowner throughout the process, with the aim to mitigate loss and disturbance as much as possible, including consideration of appropriate restoration and replanting measures.

Reference	Summary of relevant representation	Applicant's Response
4.14.8	Financial Impact We are not expecting any sympathy but Sea Link etc will hit us hard financially. We have a very strong emotional commitment to (Redacted) and the adjoining fields. In addition to that, they are significant financial assets. It would now be extremely difficult to sell our property for anything approaching its previous value. This is likely to be the case for as long as all the projects are under consideration or in train ie 10-20 years. What little we have heard about compensation suggests that any compensation for cabling running through our fields would be based on agricultural land prices. Indeed the whole approach to us has been centred around a worst case scenario of using compulsory purchase powers to take away our land at agricultural land prices. Being right next to the house, the fields are worth much more to us. It is hard to see this as fair. For these reasons my wife and I object to the Sea Link project. Lindsay P Tomlinson. 11th May 2025.	The Applicant commits to compensating for any reasonable losses arising as a result of the Proposed Project which are unable to be mitigated. The applicant is complying with the Compensation Code – Land Compensation Act 1961. The Applicant does not envisage any impact on property prices. The Proposed Project will be fully compliant with the Compensation Code where diminution in property prices can be demonstrated to have been caused. The Code sets out the parameters and evidence needed to substantiate a claim for diminution in value and when this happens.

~~Table 4.15~~ Table 4.15 Applicant's Response to the Relevant Representation of Marshes Farmers within DCO limits

Reference	Summary of relevant representation	Applicant's Response
4.15.1	Representation of marsh farmers within Kent Sea Link Development Consent Order Land affected by the Development Consent Order The DCO limits are on grade 2 land on marsh farmed by five businesses covering 1500 hectares. All farmers impacted also farm on grade 1 land producing a variety of fresh produce including asparagus, salads, herbs, potatoes, peas and winter vegetables alongside other businesses such as farm shops and business units. Each farm is run to scale with crop storage, irrigation, equipment and staff tailored to land farmed, the cumulative impact across the businesses must be accounted for.	The Applicant welcomes the affected landowners' collective engagement with the Proposed Project and acknowledges the nature and extent of their respective enterprises and operations on land within the Order Limits.
4.15.2	Nature and vulnerability of land within the DCO The land within the DCO area is alluvial clay soil with unique characteristics that have not been understood within the DCO documents. The marshland, formed over centuries by sediment infilling the Wantsum Channel, consists of deep (up to 80m) alluvial clay deposits, resembling a "giant blancmange" with a thin, 1m solid crust. Fissures and channels have established underground for a prolonged period. This young, uncompressed clay has high shrink-swell capacity, causing significant expansion and contraction. A buried salt layer from its marine past risks surfacing and contaminating watercourses. Due to its unstable, plastic nature, this soil cannot be: - - - - - - - Stripped back and replaced, as it lacks structural integrity. Heaped or stockpiled, as it becomes unmanageable and loses form. Hold heavy loads as it collapses weight. Dug at depth and reformed, as it cannot reconsolidate. Excavated and filled with water for drainage ponds, left in anaerobic conditions under heavy weight, then returned to farmland. Dug deeply without risking salination, excavation may expose and mobilise the salt layer. Allowed to naturally drain after disturbing the fissures and channels under the soil. Archaeological pits excavated on the converter site in July 2024 for the Sea Link project, have not returned to their original condition, despite being returned to the farmer to continue farming. These pits, dug to depths of 1m -2m across 30–50m trenches, are expected to take over five years to consolidate. (Photos attached)	A preliminary ground investigation has already been undertaken for the Proposed Project which considered the geotechnical properties of the strata within the Order Limits to inform the preliminary design. A further ground investigation will be undertaken to inform the detailed design of the Proposed Project in accordance with commitment GH01 included within the **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. The potential pollution risks to watercourses during construction and operation of the Proposed Project have been assessed in **Application Document 6.2.3.5 Part 3 Kent Chapter 4 Water Environment [APP-064]**. These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Proposed Projects design. The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site. **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows: "*Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.*" This would be secured through DCO Schedule 3, Requirement 6 Onshore **7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341])** and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction. The Applicant has prepared a Flood Risk Assessment **(Application Document 6.8**, which includes an assessment of groundwater flood risk to the Project. The assessment is detailed in

Reference	Summary of relevant representation	Applicant's Response
		section 4.5 of the report, informed by Appendix D, and was informed by data collected from a number of sources, including Project specific groundwater monitoring data. The tidal influence on the River Stour is acknowledged in the Flood Risk Assessment (Application Document 6.8), at para 4.3.6, and paras 4.3.16 to 4.3.18. The FRA presents an assessment of the risk of flooding from the River Stour and the Minster Stream. Tidal surge capabilities of the River Stour and Minster Stream, not recorded. The potential pollution risks to watercourses during construction and operation of the Project are assessed in ES Chapter 4 Water Environment (**Application documents 6,2,2,4 and 6.2.3.4**). These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Projects design, for example, sustainable drainage measures to capture and treat runoff, and which are described and secured through inclusion in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) The Applicant has prepared a Qualitative Groundwater Risk Assessment present as **Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-171]** which includes discussion of groundwater levels including data from preliminary site specific ground investigation, and which acknowledges that groundwater levels are likely to be close to the ground surface within parts of the Order Limits. With respect to groundwater quality, **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** contains commitments that include measures to protect groundwater including GH02 (provision of Foundation Works Risk Assessment), GH08 (protocol for dealing with unexpected contamination) and GH09 (Hydrogeological Risk Assessment).
4.15.3	DCO Documents have not effectively demonstrated: 1) That the nature of the soil is understood, only desktop ALC surveys have been completed.	1) The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site.
4.15.4	2) Land drainage systems and integrated water courses have not been surveyed.	2). **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows: "*Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.*" In order to deliver this commitment, surveys would be undertaken and landowners would be engaged with.

Reference	Summary of relevant representation	Applicant's Response
		This would be secured through DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.
4.15.5	3) Naturally high ground water and groundwater flooding, not recorded in documents.	3) The Applicant has prepared a Flood Risk Assessment **(Application Document 6.8 (APP-292)**, which includes an assessment of groundwater flood risk to the Project. The assessment is detailed in section 4.5 of the report, informed by Appendix D, and was informed by data collected from a number of sources, including Project specific groundwater monitoring data.
4.15.6	4) Full soil surveys, showing understanding of soil nature, method of repairs, high ground water, fissure maps, salt layer, water courses and reservoirs.	The Applicant has made the commitment for the completion of Agricultural Land Classification (ALC) and soils surveys during the examination phase, following appropriate Unexploded Ordnance (UXO) risk assessment and implementation of the required mitigation measures. The information gained from these surveys will be used to update **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** where necessary and soil handling measures can be updated based on confirmation of the soils identified on site.
4.15.7	5) Ariel land drainage plan survey pre and post.	Within Paragraph W10 of **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** , "Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained". The applicant has committed to appointing a land drainage consultant. Within Paragraph AS05 of the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP- 342)** it states that Consultation with affected landowners will be carried out to investigate the current extent of land drainage which will be taken into account in the development of the Drainage Management Plan (see W14) prior to construction, with the intent of maintaining the efficiency of the existing land drainage system. A detailed drainage survey comprising of intrusive and non intrusive methodology will take place ahead of design and installation of a land drainage mitigation scheme. The applicant acknowledges the concerns on land drainage. The specific wording of W10 (from **Application Document 6.4.3.4 ES Figures Kent Water Environment [APP-263]** covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. This would be secured through **DCO Schedule 3, Requirement 6**. The detail can be found in **Application Document 7.5.3.1 CEMP Appendix A - Outline Code of Construction Practice [APP-341**] and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.
4.15.8	6) Fair consideration for the length of time for re-establishment of soil – proposed 5 years minimum.	**Application Document 7.5.10.2 Outline Soil Management Plan – Kent (APP-355)** sets out the outline approach to the handling and reinstatement of soils on the project. Paragraph 8.7 of this document details than an Aftercare Management Plan will be produced by the Contractor which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by the monitoring. **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342).** Within this document, the Agriculture and Soils section commits the applicant to communicate with the landowners
4.15.9	7) Any material removed (soil, aggregate) should be replaced like for like.	Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated. This is secured by measure AS02 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].**

Reference	Summary of relevant representation	Applicant's Response
4.15.10	8) Clear guidelines with Natural England and DEFRA regarding environmental schemes, long term impacts to scheme renewals which are due during works and force majeure of contract agreements. A wildlife and habitat re-instatement scheme will be required after works. Inability for farmers to take on new environmental schemes due to development works.	Potential biodiversity impacts are considered in **Application 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]. Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent (PDA-035)** sets out the proposed landscape and ecological reinstatement proposals. The presence of Higher Level Stewardship land is not considered relevant to the EIA assessment. The Applicant can confirm they are complying with The Compensation Code and losses associated with either the derogation or termination of any stewardship agreements can be claimed for under this code. The Applicant's Land Agents are working with landowners (and their agents) who are potentially affected by losses to ensure claims are compliant with this Code.
4.15.11	9) Clear method for farmers to claim for crop loss and damage to business (previous National Grid works have left farmers unable to claim for damage and crop loss due to lengthy disputes).	The Applicant can confirm that there is a publicly available document, National Grid's Land Rights Strategy and Payment Schedule for Assets which sets out the basis of payment for additional compensation claims. Additionally, the Applicant's Land Agents are working closely with all landowner's and their Land Agents on the scheme and are reviewing claims in line with the Compensation Code. The Applicant can confirm that the Landowner's on the scheme are represented by RICS qualified land agents and are able to receive advice on how to claim, from their own agents. The Applicant can also confirm that reasonable Agents Fees are being reimbursed so the affected Land Owners are able to be represented appropriately.
4.15.12	10) Cumulative impact across businesses.	The applicant would like a little more context for this comment to allow a full answer to be provided. Both intra-project and inter-project cumulative effects have been assessed and are reported within **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP073]** respectively. In the meantime, the Applicant Land Agents are working with the landowners and their agents to help mitigate the impact of the project on the farms.
4.15.13	11) Farm drone safety assessment	The Applicant acknowledges concerns on farm safety. The Applicant will work with the landowner to ensure we can work collaboratively to help mitigate any losses. The applicant commits to detailing these requirements within an accommodation work register which will include reference to sharing of GIS boundary data where appropriate to allow drones to be reprogrammed to take into account the working width.
4.15.14	12) Details of aggregate imported and cleaning procedure.	Earthworks including the import of fill will be undertaken in line with BS 6031 Code of Practice for Earthworks and the Specification for Highways Works CC 601 Earthworks (formerly Series 600), in line with the Applicants technical standards. The imported fill will need to meet the specification of the detailed design to be deemed acceptable to be delivered to site, acceptability will be determined through rigorous testing in line with national standards and codes of practice. Should cleaning, treatment or processing of the source material be required to make it acceptable then details procedures will be developed and monitored to ensure these activities are undertaken. The control of earthworks or materials movement (including any re-use of materials) would be under appropriate Environmental Permits, exemptions or Contaminated Land: Applications in the Real Environment (CL:AIRE) 'The definition of Waste: The development industry Code of Practice (2011) as set out in the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342)**
4.15.15	13) UXO safety assessment and alert process (proximity of battery and methane plants considered).	The Applicant has undertaken UXO risk assessments for the site and is aware of the risk posed. Further survey and investigation works will be undertaken as part of the proposed

Reference	Summary of relevant representation	Applicant's Response
		development. The Applicant will be liaising with the emergency services to confirm emergency procedures in the event of finding any suspected UXOs during the works.
4.15.16	Marsh farmers within Sea Link DCO Struan Robertson, Peter Smith, Anthony Curwen, Mathew Spanton, Guy Smith, James Southorn, Nicola Dyas, Pippa Southorn. Attachment: Photos	The Applicant's agent, Dalcour Maclaren, have engaged with interested parties individually in relation to the land rights being sought. Further detail of engagement is set out in A**pplication Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.

Table ~~4.16~~ 4.16 Applicant's Response to the Relevant Representation of Michael Mahony

Reference	Summary of relevant representation	Applicant's Response
4.16.1	Please note this registration is in a personal capacity as a landowner and not as a representative of Friston Parish Council or SASES (Substation Action Save East Suffolk). I support the relevant representations of both those organisations including their opposition to Sea Link. The representations below address a couple of issues which are specific to my personal position as a home owner and landowner.	The Applicant thanks Mr Mahony for his representation and confirms the interest in land plots in Suffolk: 2/32 - Class 9. Temporary Use for Access 2/29 - Class 9. Temporary Use for Access 2/28 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/33 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/26 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/4 - Class 5. Compulsory Acquisition of Rights - Access 2/3 - Class 5. Compulsory Acquisition of Rights - Access 2/27 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.16.2	B1121 - HGV ROUTE As a landowner whose home and property is adjacent to the country lane known as the B1121 between Friston and Sternfield I am very concerned about the designation of this lane as a HGV route. Despite the traffic survey I know this road is rarely used by HGVs it is of course used by increasingly large agricultural vehicles and on occasion buses. Furthermore the proposed entrance to the so-called operational access road is far too large and out of keeping with the lane. There is no need for this entrance to accommodate HGVs and it should not be allowed to be constructed as an HGV entrance.	The main access routes for the Proposed Project during the construction phase comprise the A12, B1121 Main Road, A1094 and the B1069 Snape Road. These routes are forecast to accommodate almost all (around 97%) of the construction vehicle trips associated with the Proposed Project. The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1121 Main Road and B1119 Church Street (through Saxmundham) and Grove Road. Details of the Applicant's approach to traffic management are outlined in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337].** Where mitigation measures may be required to accommodate construction traffic, many of which were similarly identified by Scottish Power Renewables (SPR) for EA1N/ EA2, these will be reviewed and secured as part of the CTMTP through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007], superseded by [AS-043]**, following further consultation with SCC Highways. The potential impact of construction traffic on vulnerable road users has also been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, including in terms of severance, pedestrian delay, non-motorised user amenity, fear & intimidation and road safety. . An assessment of road safety, including with respect to hazardous / large loads, has been carried out based on the existing collision record of the highway network and the forecast increases in HGV activity. No significant effects have been identified for the assessments relating to vulnerable road users, based on construction traffic forecasts during the peak construction phase. The stretch of the B1121 between Friston and Sternfield is proposed to be used by the Applicant on a limited basis only. Please refer to **Application Document 2.7.1 Access Rights of Way and Public Rights of Navigation Plans - Suffolk [AS-011]** for the following references. Access points S-AP-10 and S-AP-11 are to be used to access the Applicants existing OHL assets, the works associated with these accesses would be no greater than routine maintenance of these existing assets would require. S-AP-12 is the permanent access to Kiln Lane Substation, this access must be suitable for HGV usage to enable maintenance activities in the future, however the Applicant has confirmed that this access will not be used

Reference	Summary of relevant representation	Applicant's Response
		for construction of the substation. The remaining access on this section of road is S-MAP-3 which is a monitoring and maintenance access to the drainage outfall from the proposed Saxmundham Converter station.
4.16.3	ACQUISITION OF RIGHTS OVER LAND National Grid wants access to and further rights over my agricultural land between my residential property and Friston. I have been told by National Grid that this access is only required for the purposes of re-conductoring the existing pylons on my land and the work involved will be minimal in nature. However I have received no commitments in relation to this.	The Applicant proposes to use their existing land rights (Deed of Easement) for works to the existing overhead line on land owned by Mr Mahony. If this position changes, the Applicant's agent, Dalcour Maclaren, will try to engage with Mr Mahony to secure any necessary rights on a voluntary basis as a preference.
4.16.4	Furthermore I have had discussions with National Grid about using part of my land (which is adjacent to the substations site) for ecological and environmental mitigation. I am open to such proposals but National Grid have decided not to pursue this. Accordingly given the lack of any commitment from National Grid in relation to its works and its unwillingness to pursue discussions concerning ecological and environmental mitigation I am not prepared to provide any additional rights over my land to National Grid.	The Applicant thanks Mr Mahony for his engagement with regards to the ecological and environmental mitigation. However alternative mitigation areas were identified elsewhere as set out **Application Document AS-059, 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk**, specifically Figure 4 Saxmundham Converter Station Enhancement Areas.

Table ~~4.17~~ 4.17 Applicant's Response to the Relevant Representation of Mr Andrew Johnson - BTF

Reference	Summary of relevant representation	Applicant's Response
4.17.1	Our client, Andrew Johnson is the freehold owner of the land at Kings End Farm subject to this proposed project. Our client is also the Director of Quex Park Estates Company Limited which occupies the land	The Applicant welcomes landowner engagement with the proposed project. The Applicant confirms that the landowner has interest in land plots in Kent: 1/1 - Class 5. Compulsory Acquisition of Rights - Access 1 / 2 - Class 5. Compulsory Acquisition of Rights – Access 2/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/9 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/6 - Class 5. Compulsory Acquisition of Rights - Access 2/2 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/96 - Class 6. Compulsory Acquisition of Rights - Drainage 2/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/13 - Class 6. Compulsory Acquisition of Rights - Drainage 1/20 - Class 5. Compulsory Acquisition of Rights - Access 1/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/90 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/19 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/9 - Class 5. Compulsory Acquisition of Rights - Access 1/22 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/15 - Class 6. Compulsory Acquisition of Rights - Drainage 2/95 - Class 5. Compulsory Acquisition of Rights - Access 1/16 - Class 5. Compulsory Acquisition of Rights - Access 2/3 - Class 5. Compulsory Acquisition of Rights - Access 2/21 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/1 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/6 - Class 6. Compulsory Acquisition of Rights - Drainage 2/10 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/17 - Class 6. Compulsory Acquisition of Rights – Drainage 1/11 - Class 6. Compulsory Acquisition of Rights - Drainage 2/94 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1 / 4- Class 5. Compulsory Acquisition of Rights - Access 1/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/13 - Class 5. Compulsory Acquisition of Rights - Access 1/21 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/4 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/7- Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure

Reference	Summary of relevant representation	Applicant's Response
		1/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/99 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/5 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/7 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/8 - Class 6. Compulsory Acquisition of Rights - Drainage 1/8 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/104 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/93 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/5 - Class 5. Compulsory Acquisition of Rights - Access 1/3 - Class 5. Compulsory Acquisition of Rights - Access The Applicant's agent, Dalcour Maclaren, issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Johnson's agent in meetings throughout February. Populated Heads of Terms were issued on 6th March 2025. Dalcour Maclaren have continued discussions with Mr Johnson's agent regarding the Heads of Terms and are looking to schedule a further meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.17.2	Procedural Concerns • Quex Park Estate was not consulted during the initial non-statutory phase, despite being a major stakeholder. • Lack of transparency and insufficient engagement from National Grid. • The Applicant did not provide feedback to Quex Park Estate following it's statutory and non-statutory consultations particularly in relation to the justification of the viability of Requested Changes.	The Applicant will maintain ongoing discussions with affected landowners. At non-statutory consultation stage, a desktop referencing exercise was undertaken for all route options; however, contact referencing to confirm the records was not undertaken at this stage. Once the options were refined, contact referencing commenced. During non-statutory consultation, in addition to the main stakeholder engagement events described above, there were two landowner-focused events. For these events, written invitations were sent to all contacts identified via the desktop referencing exercise. Details of the approach to consultation for Statutory consultation and the Applicant's regard to the feedback it received (including change requests) are set out in the **Consultation Report [APP-301]**. The land referencing process was ongoing throughout the pre-application period and in some instances diligent inquiries led to new interests being identified after the initial issue of Section 42(1)(d) consultation materials in October 2023.
4.17.3	Environmental & Ecological Impact • Kings End Farm is a high-biodiversity site with: • 493.66 acres of Grade II arable land. • Participation in Higher Tier Countryside Stewardship. • Habitat creation for endangered species (e.g., lapwings, curlews, turtle doves). • Involvement in RSPB's Operation Turtledove and the Nature Friendly Farming Network.	The proposed Kent substation as shown in **Application Document 2.14.2: Indicative General Arrangements Plans – Kent [APP-039],** is sited on land which is Provisionally mapped as Grade 2 land (see **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]**). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a and not Grade 2 land. As such, the siting of the converter station has focussed on lower grade land through the initial review of available Provisional mapping and based on the predictive mapping.

Reference	Summary of relevant representation	Applicant's Response
	• The proposed overhead lines threaten: • Irreplaceable habitats. • Bird flight paths along the River Stour. • Ramsar and SSSI sites (e.g., Pegwell Bay, Sandwich Bay to Hacklinge Marshes).	The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site. Detailed surveys (including several seasons of breeding and wintering bird survey, and surveys for dormice, reptiles, riparian mammals, bats, badgers and other wildlife) have been undertaken to establish the ecological value of land within the Order Limits and surrounding area, and to enable impacts to be assessed and detailed mitigation measures to be devised. These are reported and assessed in **Application Document AS-047 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]** and a range of measures introduced to ensure this is not significant. These are detailed in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]** and include: Use of noise reduction techniques to reduce noise to an acceptable level over as much of the site as possible. Programming the overhead line pylon base installation to avoid the core wintering period of October to February, thus considerably reducing the extent of disturbance and displacement of wintering birds south of the River Stour. Programming works that would increase noise levels at Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) above 60dB to avoid the bird nesting season of March to June Ensuring disturbing works commence in an area prior to the start of the Cetti warbler nesting season where possible. A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. Undertaking update water vole, otter and beaver surveys of watercourses to be crossed to enable burrows to be avoided where possible or riparian mammals to be excluded from the works area if necessary. Ensuring that lighting controls are implemented during construction and operation. Moreover, the planting proposed around the converter station as detailed in **APP-349 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent** will result in a long-term net increase in the amount of species-rich grassland, woodland and wetland habitat compared to the current situation, which will significantly benefit wildlife. An assessment of avian collision risk is presented in **ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**, which is supported by the results of corpse searches along the existing OHL network presented in **ES Appendix 3.2.G Overhead Line Mortality Monitoring Survey Report [APP-153]**. This shows that for the majority of species the risk of collisions is fewer than one individual annually. Even for species where the extrapolated number of transits through the 'at risk' zone generates a potential collision event that exceeds one individual per year, such as Cormorant, Greylag Goose and Mallard, given the caveats in generating the

Reference	Summary of relevant representation	Applicant's Response
		extrapolated annual transits and absence of modelling for predicted collisions, these annual figures are low in comparison to regional populations. The recorded mortality from corpse searches along the existing OHL network in the Survey Area was only noted for a limited number of species. Notably, many of the species recorded as making a large number of flights through the risk zone, were not among those species recorded as collision events, e.g., Cormorant, Greylag Goose and other duck species, beyond Mallard. Indeed, for species such as Cormorant, observations of flights regularly recorded the species passing over the existing OHL. Although the risk of significant mortality is therefore assessed as low, mitigation measures in the form of bird diverters will be included on the new section of overhead line. On other overhead powerlines around sensitive wetlands (an example being the Wildfowl and Wetland Trust reserve at Welney) the bird diverters have spinning reflectors, with glow-in-the-dark panels, which makes them more visible for a time after dusk. Hanging deflectors are also used. It is considered that in the context of the proposed Kent Onshore Scheme and species involved hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions. The diverters are commitment B55 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**.
4.17.4	Biodiversity Net Loss • Kings End Farm has a high biodiversity baseline (BNG Metric 4.0). • The project risks permanent biodiversity loss without adequate local mitigation. • Concerns that mitigation may be off-site and not benefit the affected land.	The impact of the Proposed Development on ecology in Kent has been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**. This has included extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats, and trees and hedgerows. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]** which are secured in turn via Schedule 3, Requirement 6 of **Application Document 3.1 draft Development Consent Order (DCO) [AS-012]**. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
4.17.5	Land Rights & Compensation • Previous compensation models under National Grid's Land Rights Strategy (e.g., Richborough Connection) were inadequate. • Fixed payments ignored site-specific impacts and broader land sterilization.	The Applicant commits to any losses arising as a result of the Proposed Project that are unable to be mitigated will be compensated for as provided by the Compensation Code. The Applicant's land agents (Dalcour Maclaren) are organising meetings with landowners to discuss agri-environmental schemes and compensation provisions. They are also compiling a list of Accommodation requirements which will be shared directly with the Main Works Contractor.
4.17.6	Farming & Stewardship Disruption • Potential damage to soil, drainage, and crop rotation. • Threat to compliance with Countryside Stewardship schemes. • Risk of penalties and loss of environmental gains built over decades.	4. The comments here do not specify a particular type of stewardship scheme, although it is noted that Higher Level Stewardship (HLS) schemes (referenced in other Relevant Representations from this area) are intended to maintain, improve or create habitats and can contribute positively to local landscape character. HLS schemes are not, however, considered to be a receptor of environmental impact and therefore have not been specifically assessed in the ES. Impacts upon any habitats maintained, improved or created under HLS are considered in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-035]**. Any impacts upon landscape

Reference	Summary of relevant representation	Applicant's Response
		character are reported in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**. Potential impacts on agriculture and soil are considered in **Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]** whilst impacts on drainage are considered in **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**. The Applicant can confirm they are complying with The Compensation Code and losses associated with either the derogation or termination of any stewardship agreements can be claimed for under this code. The Applicant's Land Agents are working with landowners (and their agents) who are potentially affected by losses to ensure claims are compliant with this Code. The Applicant has committed to engage constructively with landowners throughout the duration of the Proposed Project, with the aim of mitigating any losses incurred and ensuring practical solutions are implemented to reduce impacts to farming businesses. Within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (APP-342)**, there are a number of measures which will ensure adequate engagement with landowners is undertaken with regards to restoration of agricultural land (AS02), access to agricultural land uses (AS03) and land drainage (AS05).
4.17.7	Requested Changes • Undergrounding of cables from the converter station to the Richborough Connection. • National Grid must justify why undergrounding is not feasible (beyond cost). • Avoid long-term ecological damage by adopting less intrusive engineering solutions.	Cost is not the determining factor behind the decision to utilise an overhead line in this location. Rather, the poor ground conditions under the railway preclude the use of trenchless technology to cross from the substation to the overhead line; these would cause settlement issues for the railway line. The Applicant considered locations further north from the Converter Station site towards Minster for a crossing point where the ground is more suitable, however, this would introduce more trenching, ditch crossings and land take. Once across the railway, the river would still have to be crossed which proves difficult again due to the ground conditions, because trenchless technology needs stable ground conditions for it to be feasible and the conditions under the river are not considered to be stable enough. Once under the river, construction of further electrical infrastructure (a smaller substation) would be required in the floodplain, to connect the cables to the existing overhead line. Considering all of the engineering challenges set out above alongside the environmental impacts of a larger footprint of the construction works and the safety concerns over going under the railway, the conclusion was to use overhead lines. Further details of the option selections are contained in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**. As part of the Proposed Project ES National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. The potential impacts on birds in Kent are presented in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and** **Biodiversity [AS-047]**. Mitigation measures for the Proposed Project can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through Requirement 6 of **Schedule 3 of the draft DCO (Application Document 3.1) [AS-012]**.

~~Table 4.18~~

Table 4.18 Applicant's Response to the Relevant Representation of Nicola (Ning) Suzanne Fulford

Reference	Summary of relevant representation	Applicant's Response
4.18.1	My property shares curtilage with the substation and inter-connector site at Friston.	The Applicant thanks Ms Fulford for their representation and will continue to engage in respect of the land rights required to facilitate the proposed project. The Applicant acknowledges that both Mr and Mrs Fulford have made relevant representations as joint landowners – Mr Simon Fulford RR reference – 5020. The Applicant confirms Ms Fulford has an interest in plots in Suffolk; 2/31 - Class 9. Temporary Use for Access 2/28 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/29 - Class 9. Temporary Use for Access 2/32 - Class 9. Temporary Use for Access Nicola Suzanne Fulford Friston House Friston Saxmundham IP17 2/33 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/26 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/30 - Class 9. Temporary Use for Access. The Applicant proposes to use their existing land rights (Deed of Easement) for works to the existing overhead line on land owned by Mrs Fulford. If this position changes, the Applicant's Land Agent, Dalcour Maclaren, will engage with Mrs Fulford to secure any necessary rights. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.18.2	We have therefore lived through the application made by Scottish Power Renewables (SPR) which was granted. This application included consent for National Grids main connection hub. The report presented by the Examine Authority for that application stated: "28.4.5 … The ExA observes that the effects of the cumulative delivery of the proposed development with other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location."	The Applicant is coordinating with other developers of large-scale infrastructure projects in Suffolk, noting that the planning and delivery requirements of those other projects are outside its control. The Applicant has set out details of how it has coordinated with other projects as part of its DCO application (Application Document 7.10 Coordination Report). The Applicant is cognisant of the environmental and community benefits that NPS' identify when advocating coordination. This report therefore outlines the considerable efforts that are being made to engage with other projects and identifies approaches to coordinating consenting, project development and project delivery in order to reduce impacts on local communities and the environment from the Suffolk onshore Scheme and offshore schemes. Cumulative impact of the Proposed Project together with SPR and other projects have been assessed and reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] in line with guidance on cumulative effects assessment published by the Planning Inspectorate (Planning Inspectorate, 2024).
4.18.3	Why are National Grid reapplying for something they already have permission for and whose DCO includes clear boundaries?	Friston substation is an essential component of the EA1N, EA2 and Sea Link projects so is included in all three applications. This means that there is an overlap in the Order limits for the three projects in the area north of the village of Friston. If the new substation is already constructed under the earlier Scottish Power Renewables consents for the East Anglia One North and East Anglia Two projects, as is highly likely and indeed what is expected to happen, the Proposed Project will only build the connection

		infrastructure into it. Including the Kiln Lane substation in the DCO provides the necessary certainty that the Applicant requires to ensure that Sea Link can be delivered. This recognises that the Applicant does not yet have the planning permission nor land rights required to actually deliver it (noting that the DCO for the substation currently benefits Scottish Power Renewables rather than the Applicant). This approach avoids potential legal or logistical complications later in the process.
4.18.4	The fact that this application for Sealink fails to use the DCO granted for SPR as a template makes a mockery of the whole planning process and exposes the inadequacies within it. Hundreds of thousands of pounds was spent by the local community during SPR's application to fight to stop Friston being selected as the site for their project, in addition, should permission be granted, that the appropriate mitigation was put in place to protect the village and houses that surround the site. The report presented by the Examine Authority for SPR's application stated: "28.4.4 … The local harm that the ExA has identified is substantial and should not be underestimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance." This new application is brutal for those of us who live adjacent to the site. National Grid seem to have forgotten that they already have permission for their main connection (possibly because they did not get what they wanted?) and it is asking for a 7 day working weeks, long working days (adding an extra hour to each end of the day), increased noise levels (SPR's DCO allows for no construction work on Saturday afternoons, Sundays and Bank Holidays) - They chose this site so close to both a village, town and residential housing so they should have the well-being of the inhabitants front and centre at all times. If they didn't care about disruption and noise they should have chosen a site far away from dense human habitation, and in Suffolk there are many area's that fit that criteria! I have many concerns, here are just a few.	The Applicant is working closely with SPR on the delivery of Friston (Kiln Lane) substation and is confident that delivery of the substation under the SPR consents remains the most likely scenario. The substation is an essential component of the Proposed Project but at present National Grid has neither the planning permission nor land rights required to actually deliver it. It is therefore necessary for the Applicants to have the powers required to deliver Kiln Lane / Friston Substation as a backstop position to ensure that the Proposed Project is deliverable. The Applicant is working with ESC to consider whether there are specific elements of the Proposed Project where further restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works at Friston substation) set out in **Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087]** with the working hours secured in the SPR EA1N and EA2 DCOs. As set out elsewhere, it is anticipated that the Friston (Kiln Lane) substation will be implemented under the extant consents in any case.
4.18.5	Noise: The Noise from any final structure should be the same (or less than) as was granted under the SPR application. Switch gear and cooling fans have not been included in the noise assessment, why not?	The noise limits within the SPR DCO will be adhered to. The Switchgear itself does not make any noise, while the operational noise of a circuit breaker is very limited in duration and unlikely to be audible over the distance at which the nearest properties are situated Noise from switchgear operation was scoped out of the Environmental Statement on the basis that it would operate rarely and therefore would not generate significant effects. However, an assessment of operational noise from switchgear has been included, for information, in **Application Document 6.3.2.9.E (B) Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [AS-121]** at the request of East Suffolk Council. The assessment confirms that operational noise from switchgear and cooling fans would not be significant at nearby noise sensitive receptors (NSR). The proposals for the National Grid substation at Friston have developed since SPR DCO was granted in 2022. Specifically with regards to noise, the current proposals are for gas insulated switchgear (GIS), whereas the SPR proposals were instead for air insulated switchgear (AIS). GIS operates at lower noise levels than AIS as the mechanism is enclosed. Additionally, the GIS would be housed within a building. As such, noise levels from switchgear operation would be lower than those for the SPR application. This is confirmed by a comparison of the noise levels for GIS switchgear presented in **Application Document 6.3.2.9.E (B) Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [AS-121]**, and East Anglia ONE North and East Anglia TWO Offshore Windfarms Clarification Noise – Noise Modelling dated 13th January 2021. The East Anglia ONE and TWO assessments indicated a predicted maximum noise level of 61 dB $L_{Amax,f}$ at the nearest receptor from the operation of AIS, whereas the Sealink assessment indicates a predicted maximum noise level of 30 dB $L_{Amax,f}$ at the nearest receptor. Maximum noise levels from GIS operation are therefore expected to be approximately 30dB lower than those from AIS operation.

4.18.6	Fire: Sub-stations catch fire all the time, most recently at Heathrow. You just have to google ‘substations catching fire’ and so many pop up, yet you propose putting this potential danger adjacent to a village with narrow country lanes which would impair a fire engines attempt to attend. Aside from the fire itself what about the effect of the toxins from the fire and the retardants that are needed to extinguish one on the residents of Friston?	Safety is fundamental to National Grid’s operations. Fire is relatively rare in transmission substations in the UK and no instances of fire have breached the perimeter (Fence line) of National Grid’s footprint. There is no risk of fire spreading to vegetation, crops or houses. We are confident of this because of the safety precautions and systems that will be installed, for example fire deluge systems, heat and smoke detectors, alarms and remote monitoring systems. Every site has a Fire Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 which is carried out by trained fire risk assessors. In addition, regular drills and coordination with emergency response services ensure readiness in the event of an emergency.
4.18.7	Roads/traffic: There should be no construction allowed on the B1121 through the village or the surrounding lanes.	The main access routes avoid both Friston and Sternfield and will accommodate almost the entirety (circa 97%) of all construction vehicle trips associated with the Proposed Project. The overall routing strategy is therefore designed to minimise construction vehicles along alternative less suitable routes such as the B1121 Saxmundham Road through Friston. A maximum of nine construction vehicles per hour, and fewer than 30 peak daily construction vehicles are expected along the B1121 Saxmundham Road through Friston to access existing Overhead Line towers (via access S-BM11) as a result of the Proposed Project, as shown by **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. As shown by **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]**, all construction vehicles will avoid Sternfield. Therefore, additional traffic along the B1121 Saxmundham Road will be minimised and the village of Sternfield will be avoided by construction traffic.
4.18.8	The impact for the town of Saxmundham, the village of Friston and rural houses that surround the site are considerable. As human beings our wellbeing is totally compromised, my husband and I now live in a constant state of stress and anxiety. The carelessness with which the local communities are treated by these large companies is appalling - at what point does ‘doing the right thing’ become the priority over profit?	The Applicant recognises that health and wellbeing is affected by multiple environmental and social factors during the construction and operational phases of the Proposed Project, such as additional traffic, noise, dust, and amenity. As such, each of these topics has been assessed individually within **Chapter 7: Traffic and Transport [APP-054], Chapter 8: Air Quality [APP-055], Chapter 9: Noise and Vibration [APP-056], Chapter 10: Socio-Economics, Recreation and Tourism [APP-070]**, and **Chapter 12: Landscape and Visual [APP-048]**, and their influence on health and wellbeing considered in **Chapter 11 Health and Wellbeing [APP-058]**. The assessment of health and wellbeing impacts adheres to the latest best practice guidance from the **IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022)** and also best practice methodology used on other major infrastructure schemes. Specifically, the assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Embedded mitigation measures are incorporated into the Scheme as set out in the respective ES chapters to reduce effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective, as set out in **Chapter 11 Health and Wellbeing [APP-058]**. Specific mitigation measures to manage and control construction impacts are set out in the **Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337];** the **Outline Onshore Construction Environmental Management Plan [APP-340];** and the **CEMP Appendix A Outline Code of Construction Practice [APP-341].** These have been factored into the health and wellbeing assessment. For example, the **CEMP Appendix A Outline Code of Construction Practice [APP-341]** confirms that *“Construction workers will undergo training to increase their awareness of environmental issues as*

	applicable to their role on the project," including topics such as traffic management and noise and vibration reduction measures. The measures set out in the **Outline PRoW Management Plan – Suffolk [APP-352**] ensure that connectivity, accessibility, and the recreational value of the routes are maintained where possible. These measures will ensure that local communities are protected, residual effects are minimised. As a regulated and licensed body, the Applicant has an obligation to bring forward an economic and efficient solution to the capacity constraints highlighted by the system operator, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. Furthermore, the Applicant has taken the utmost care in the development of the Proposed Project, with the health and safety of the public, local communities and employees being its highest priority.

~~Table 4.19~~

Table 4.19 Applicant's Response to the Relevant Representation of Nicolas Jon Stuchfield

Reference	Summary of relevant representation	Applicant's Response
4.19.1	I have an interest in the project as NGET is seeking an Easement over a section of our garden. I am not in principle against the project and I understand the logic of connecting Suffolk to Kent to enable electricity to flow in both directions around the outer-London ring.	The Applicant thanks Mr Stuchfield for their representation and will continue to engage in respect of the land rights required to facilitate the proposed project and acknowledges that both Mr and Mrs Stuchfield have made relevant representations as joint landowners. RR reference -2471 provided by Mrs Stuchfield. The Applicant confirms Mr Stuchfield has an interest in land plot in Suffolk: 5/33 - Class 3. Compulsory Acquisition of Rights - Underground Cable System. The Applicant's agent, Dalcour Maclaren, have engaged with Mr Stuchfield and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Stuchfield's agent on 15 April 2025 and 22 August 2025. Dalcour Maclaren have continued discussions with Mr Stuchfield's agent regarding the Heads of Terms. Dalcour Maclaren emailed Mr Stuchfields agent on 10 September 2025 and 15 October 2025 requesting a meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.
4.19.2	However: The location of the Converter station (in Saxmundham) significantly further inland than the Substation in Friston seems to be illogical, requiring several kilometres of additional cabling at a no doubt significant extra cost. (I am not convinced by the realism of moving these two pieces of switching infrastructure offshore on the grounds of cost.) The location of the land-fall of the cable, though far from ideal personally, does not seem totally illogical either (though there might be less environmentally sensitive land-fall locations available).	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. The evolution of the Proposed Project and the rationale underlying the selection of Saxmundham as the preferred location for its converter station is described in **Corridor Preliminary Routeing and Substation Siting study** [**APP-368**]. This process was the subject of extensive public consultations as set out in the **Consultation Report** [**APP-301]**. Reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**. The Applicant's duties and obligations involve balancing the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered. **Application Document 7.3 Design Development Report [APP-321]:** Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for.

Reference	Summary of relevant representation	Applicant's Response
		Application Document 8.1 Corridor Preliminary and Routeing and Siting Study (October 2022) [APP-368]: Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. These documents set out the many factors considered in identifying site options and selection of a preferred option.
4.19.3	Discussions with members of the NGET project team and its agents suggest that the disruption to our lives and the peaceful enjoyment of our home will be immense. We have been informed that there will be not one but 2 construction compounds (one for the tunnel-boring for the seaward cable, and one for the trench-digging for the landward cable) covering up to 10 acres in total both tightly positioned against our garden fence. These will result in light pollution, noise pollution, dust, refuse and the despoliation of the beautiful view, the peace and tranquility of which were the major reason for our buying here in 2009. Whilst these very significant nuisances may be temporary (18-months is the timescale we have been led to expect), my wife and I have little confidence that the project team understands or cares greatly about the ruination of our life for the duration of the project (not to mention the blight, stress and hassle of preparing for it and negotiating any relief).	The Applicant acknowledges the concerns of the landowner and has assessed the potential amenity impacts in this area and upon wider community receptors in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. The assessment considers potential effects such as noise, dust, traffic, and visual disturbance that could influence health and wellbeing. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on residents and local community assets arising from construction of the Suffolk Onshore Scheme. The Study Area used in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** cover the local wards of Saxmundham and Aldeburgh & Leiston within East Suffolk, which encompass smaller settlements. This ensures that residents and landowners within and immediately surrounding the construction footprint are included in the assessment. The methodology adopted a holistic but locally sensitive approach, considering potential effects on both the wider community and those located closest to construction activities. Accordingly, the assessment presented in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** fully captures and addresses potential localised effects on nearby landowners, and the conclusions remain valid and proportionate. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in **CEMP Appendix A Code of Construction Practice [APP-341]** and the **CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. In relation to air quality effects, the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [APP-346]** outlines the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively. In relation to noise and vibration effects, **Application Document 7.5.8.1 Outline Noise and Vibration Management Plan - Suffolk [AS-132]** (NVMP) outlines the proposed construction

Reference	Summary of relevant representation	Applicant's Response
		noise and vibration management and mitigation measures. The NVMP will be updated by the contractor(s) prior to and during the works based on their specific methodologies and mitigation measures. The Applicant notes these concerns and is committed to working with the landowner to apply accommodation works to mitigate disruption where possible. The Applicant's Land Agent is in contact with this landowner and will compile a list of actions the Main Works Contractor will need to enact in order to help mitigate the effect of this project on the landowner.

Table ~~4.20~~ 4.20 Applicant's Response to the Relevant Representation of Pippa Southorn

Reference	Summary of relevant representation	Applicant's Response
4.20.1	As a consultee, I am deeply frustrated by the lack of clear communication and the (Redacted). The submission documents are poorly drafted, contradictory, and lack clarity, making it impossible to fully understand the project's impacts. The 407 documents are not only difficult to navigate but also contain conflicting information and critical omissions. After a decade of unresolved issues from National Grid's Nemo Link project and damage still unrepaired, I am now compelled to raise serious concerns. Key issues include: Unnotified Drainage Ponds on Arable Land: I discovered plans for drainage ponds on my arable land through a map, with no prior consultation or mention from National Grid or their agents. Misrepresentation of Higher Environmental Schemes: Our farm's wetland, recreated for winter wading birds, is incorrectly described as "grazing land" or "degraded grassland" across the documents. This error is insulting and reflects the submission's lack of accuracy. Impact on Our Reservoir: Our reservoir, critical for irrigating salad crops supplied to supermarkets as part of a European supply chain supporting hundreds of jobs, faces potential disruption. No consultation has been provided on this matter. Flooding Risks to Arable Land: The documents fail to address the flooding risks to our arable land, again with no consultation. Despite repeated emails to Dalcour Maclaren requesting clarification on these impacts, I have received no response. The expectation that affected people dedicate countless hours to deciphering these flawed documents is unfair and unreasonable. Thousands of people, across all aspects of life, are impacted by this project, and we deserve a clear, concise explanation of National Grid's plans and their specific effects on our properties and livelihoods. Can I please request Review and revise their submission to eliminate errors, contradictions, and omissions. Provide a clear, accessible summary of the Sea Link project, detailing its impacts on individuals. Engage in meaningful consultation with affected people to address our concerns. The current submission fails to meet the standards of transparency and fairness that we are entitled to.	The Applicant acknowledges the comments raised. Further detailed responses to the issues highlighted in the representation are provided below. The Applicant confirms Ms Southorn has an interest in land plots in Kent: 2/56 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/65 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/66 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/67 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/69 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/70 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/71 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/72 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/73 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/74 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/75 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/76 - Class 5. Compulsory Acquisition of Rights – Access 2/78 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/79 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/84 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/107 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/108 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/109 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/111 - Class 6. Compulsory Acquisition of Rights – Drainage 2/112 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/113 - Class 5. Compulsory Acquisition of Rights – Access 2/187 - Class 5. Compulsory Acquisition of Rights – Access The Applicant's agent, Dalcour Maclaren, have engaged with Ms Southorn and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued Terms for

Reference	Summary of relevant representation	Applicant's Response
		Occupiers Consent to Ms Southorn and their agent in May 2025 and Dalcour Maclaren have continued discussions with the Ms Southorn's agent regarding the Terms. Dalcour Maclaren have continued to engage with Ms Southorn in relation to the impacts of the proposed scheme on the land that they occupy
4.20.2	Applicant's previous issues from National Grid Nemo Link project - not resolved 1.Bank to River Stour dipped after temporary bridge at TR 30657 62778 2. Trees planted without permission blocking tractor access at TR 30839 62812 Impact: Flooding during high surface water events across public footpath. Tractor access and pump damage Policy: Planning Act 2008 – Section 152 Action: Repair river bank Remove trees blocking access and remove plastic covers off the rest. Ongoing unresolved issues with Nemo Link raise concerns over Sea Link. Action plan with accountability for follow-up and resolving issues with Sea Link required.	Note that Nemo Link is not a National Grid Electricity Transmission project but a National Grid Ventures project. These are separate businesses, as explained in paragraph 1.6 of the **Application Document 7.1 Planning Statement [AS-057]**. The applicant recognises that a previous scheme, the RIchborough to Canterbury Connection Project, interacted with Ms Southorn's land. We would recommend that Ms Southorn's land agent works with that project to ensure legacy works are picked up. The Applicant can only be responsible for works associated with the Proposed Project and will look to mitigate impacts from the construction and operation of the project in as far as possible. In relation to Sea Link, there will be a need to install a temporary bridge over the River Stour. Impacts from this temporary bridge will be mitigated through a number of measures included within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] (e.g. B10, W04, W06). Measures include the bridge having a soffit height sufficient to meet navigational requirements and in excess of the 0.5% flood level plus 600 m freeboard to mitigate flooding.
4.20.3	Un-consulted drainage Ponds APP-039 Drainage ponds discovered on sheet 2 of 6 in various locations close to TR 31872 62921 without prior consultation or indication. Issues; land loss, track access, damaged soil structure, increasing flood size by introducing and collecting water. Policy: Planning Act 2008 – section 42 requires consultation prior to submitting DCO. Explain requirements, Prevention of flooding outside boundary of pond. Reinstatement of agricultural land with emphasis on heavy clay soil protection.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination to address and seek resolution to matters of concern. The temporary drainage works were included within the Preliminary Environmental Information Report (PEIR) Volume 1 Part 1 Chapter 4 Description of the Proposed Project at statutory consultation in Autum 2023. The description identified that temporary drainage systems would be required along the length of the project. APP-039 shows an indicative drainage arrangement to provide further clarity on the works. As these General Arrangement plans are indicative, the design information they show is subject to change at detailed design as outlined within the **Application Document 2.1 Guise to the Plans** (**APP-017**). Impacts on agricultural land and soils from the Proposed Project, including temporary and permanent drainage proposals are assessed in **Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**. Impacts on drainage and flood risk are reported within **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**. An Outline Soil Management Plan has been produced [**APP-355**] to ensure the effective management, protection, and reinstatement of soil resources during the Proposed Project. The plan outlines the necessary measures to minimise soil degradation and promote sustainable land use in accordance with best practice and regulatory requirements.
4.20.4	Groundwater Flooding APP-170	**Application Document 6.8 Flood Risk Assessment [APP-292]** assesses groundwater flood risk using data from several sources, including GeoSmart GW5 groundwater flood risk map,

Reference	Summary of relevant representation	Applicant's Response
	Statement of "no flood risk" is not consistent with survey APP171 Which shows ground water 1 meter below converter at 0.5 meters below pylons. Risks crop loss. Unknown aquifers present. Blocking or draining could lead to salination of aquifer or flooding without full study. Policy: Overarching Energy NPS, updated 2024 Action: Consistency in ground water modelling and flood risk prevention.	Kent County Council's Flood Risk to Communities (Thanet) document and groundwater level monitoring data from several boreholes that were drilled within, adjacent to and distant from the Kent Onshore Scheme study area. The data review concluded that the mechanism for flooding in the Thanet area is a shallow water table impeding rainfall infiltration and increasing the risk of surface water flooding (surface flooding driven by groundwater conditions) rather than emergence of groundwater from rising bedrock groundwater levels. As such, robust design solutions have been included for, with the development design accounting for fully saturated ground, and surface water drainage measures based on fully saturated ground conditions with zero infiltration potential. The Project also includes a commitment, W10 in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, which secures the provision of temporary alternative land drainage routes where these are impacted by construction of the Project and subsequent permanent reinstatement or rerouting to ensure existing land drainage functions are maintained.
4.20.5	Abstraction Licence and reservoir protection EA abstraction Licence number 09/209/ROI, 09/208/ROI abstracting from points TR31276 64016 and TR30154 62800. And gravity fed abstraction for wetland recreation collecting storm surge water licence number SO/040/0009/023 Reservoir at location TR 31142 63975 APP-062 No impact assessment on abstraction and reservoir contamination. Abstraction licence omitted from documents Impact: Irrigation of 80 hectares of salad production, Impacting larger scale business across UK and Europe. Policy: Water Resources Act 1991 Action: Clarification on water contamination and impacts on reservoir Storage and abstraction licences. We would expect the water quality and quantity not to be effected in anyway as a result of the scheme.	Where applicable, Environmental Permitting Regulation permits would be secured for the discharge of runoff, as detailed in Commitment GG01 within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. The potential pollution risks to water during construction and operation of the Proposed Project have been assessed in **Application Document 6.2.3.5 Part 3 Kent Chapter 4 Water Environment [APP-064]**. These documents describe a range of measures that would be put in place to avoid and manage pollution risks, which are both embedded into the Proposed Projects design. In summary, no new consumptive abstractions from local surface or groundwater resources are proposed to support the Projects construction or operation. Therefore, combined with all of the measures secured to avoid and manage pollution risks there would be no significant effects on water quality or quantity and no detriment to the integrity of existing local abstractions.
4.20.6	HLS Omission APP –062 Higher Level Environmental scheme omitted across all documents. Impact: Risks environmental penalties and removal from scheme across entire farm. Risk to wildlife now embedded in due to proximity of converter station and bridge construction within HLS scheme. Policy: Conservation of Habitats and Species Regulations 2017 Provide scheme guidance to wetland recreation in area of temporary bridge. Provide details on how scheme across entire farm will be managed. Provide details on force majeure agreement within documents	Higher Level Stewardship (HLS) schemes are intended to maintain, improve or create habitats and can contribute positively to local landscape character. However HLS schemes are not considered to be a receptor of environmental impact and are not therefore specifically assessed in the ES. Impacts upon any habitats maintained, improved or created under HLS are considered in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]**. Any impacts upon landscape character are reported in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**. The project can confirm they are complying with the Compensation Code and will assess any claims made for losses associated with this project in line with that code.

Reference	Summary of relevant representation	Applicant's Response
4.20.7	Clay soil protection APP-064 Limited understanding of working with clay marsh soil to prevent compaction and flooding demonstrated. Does not align with survey APP171 describing soil types and reinstatement Impact: Permanently damaged soil structure. Policy: National Grid best practice" is not suitable for this soil type. Specialist required to confirm best practice Action: Evidence of methodology to mitigate the impact. Soil	The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site.
4.20.8	Condition Survey - Clarification on accountability for damage. Clarification on accountability for damage Action: A condition survey across all limits agreed by both parties would be reassuring to ensure we understand who is accountable for damage caused.	The Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the grades affected within the Order Limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The information gained from these surveys will be used to update the **Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** so that the full baseline information is included in the Plan and soil handling measures can be updated based on the soils identified on site.
4.20.9	Inadequate consultation The design and layout that has been submitted was not property consulted on as part of the statutory consultation process. Impact: Inadequate documents provided. Lack of time to review or gather data to provide alternative design and layout. Action: The Applicant to provide the above actions which will aid our consultation concerns and allow us to potentially present alternative options to consider.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. The Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory standard for the planning inspectorate to accept the application for examination The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the **Notification of Decision to Accept Application [PD-001]** issued on behalf of the Secretary of State on 23 April 2025.

Table ~~4.21~~ 4.21 Applicant's Response to the Relevant Representation of Quex Park Estates Company Limited

Reference	Summary of relevant representation	Applicant's Response
4.21.1	This project will significantly affect the wildlife its associated schemes, agriculture on the site owned by the Quex Estate.	The Applicant thanks Quex Park for its relevant representation. The Applicant confirms that the landowner has interest in land plots in Kent: 1/1 - Class 5. Compulsory Acquisition of Rights - Access ½ - Class 5. Compulsory Acquisition of Rights – Access 2/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/9 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/6 - Class 5. Compulsory Acquisition of Rights - Access 2/2 - 2/96 - Class 6. Compulsory Acquisition of Rights - Drainage 2/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/13 - Class 6. Compulsory Acquisition of Rights - Drainage 1/20 - 1/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/90 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/19 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/9 - Class 5. Compulsory Acquisition of Rights - Access 1/22 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/15 - Class 6. Compulsory Acquisition of Rights - Drainage 2/95 - Class 5. Compulsory Acquisition of Rights - Access 1/16 - Class 5. Compulsory Acquisition of Rights - Access 2/3 - Class 5. Compulsory Acquisition of Rights - Access 2/21 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/1 - 2/6 - 2/10 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/17 - Class 6. Compulsory Acquisition of Rights – Drainage 1/11 - Class 6. Compulsory Acquisition of Rights - Drainage 2/94 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure ¼ - Class 5. Compulsory Acquisition of Rights - Access 1/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/13 - Class 5. Compulsory Acquisition of Rights - Access 1/21 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/4 - Class 2. Compulsory Acquisition of Rights - Overhead Line 1/7- Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure

Reference	Summary of relevant representation	Applicant's Response
		2/99 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/5 - 2/7 - 1/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/8 - 1/8 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/104 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/93 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/5 - Class 5. Compulsory Acquisition of Rights - Access 1/3 - Class 5. Compulsory Acquisition of Rights - Access The proposed project seeks to mitigate its impact on wildlife and the current farming practices and will engage directly with Quex Park to seek a practicable solution. Any losses and arising as a result of the project that are unable to be mitigated will be compensated for as provided by the Compensation Code.
4.21.2		The Applicant's agent, Dalcour Maclaren, have engaged with Quex Park Estates Company Limited and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Quex Park Estates Company Limited's agent in meetings throughout February. Populated Heads of Terms were issued on 6 March 2025. Dalcour Maclaren have continued discussions with Quex Park Estates Company Limited's agent regarding the Heads of Terms and are looking to schedule a further meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.

~~Table 4.22~~

Table 4.22 Applicant's Response to the Relevant Representation of Robert Roy Jonas Nichol

Reference	Summary of relevant representation	Applicant's Response
4.22.1	Dear planning committee, I feel very strongly about the destruction of prime farmland for the building of the substation, and convertor stations, and the cable route.	The Applicant thanks Mr Nichol for his representation and understands his interest in land plots (Suffolk) to be: 1/44 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/32 - Class 7. Compulsory Acquisition of Rights - Mitigation 1/31 - Class 6. Compulsory Acquisition of Rights - Drainage 1/34 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/23 - Class 1. Compulsory Acquisition of Land 1/29 - Class 4. Compulsory Acquisition of Rights - Construction Compound 1/40 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/39 - Class 5. Compulsory Acquisition of Rights - Access 1/26 - Class 4. Compulsory Acquisition of Rights - Construction Compound 1/33 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and 1/13 - Class 7. Compulsory Acquisition of Rights - Mitigation 1/27 - Class 6. Compulsory Acquisition of Rights - Drainage 1/19 - Class 1. Compulsory Acquisition of Land 1/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/16 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/50 - Class 5. Compulsory Acquisition of Rights - Access 1/51 - Class 6. Compulsory Acquisition of Rights - Drainage 1/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/68 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/55 - 1/26 - Class 4. Compulsory Acquisition of Rights - Construction Compound 1/44 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure The Applicant's agent, Dalcour Maclaren, have engaged with Mr Nichol and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Nichol's agent in meetings throughout February. Populated Heads of Terms were issued on 06th March 2025. Dalcour Maclaren have continued discussions with Mr Nichol's agent regarding the Heads of Terms. Dalcour Maclaren issued revised terms to the landowner's agent on 29 October 2025.

Reference	Summary of relevant representation	Applicant's Response
		Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.22.2	I am not against windfarms, or renewable energies, but why do they need to be built on land? Other countries in Europe have managed to cost effectively build these projects offshore near to the wind farms, why can't we? This area is known for it's farmland, and with other energy builds already happening in this area (namely Sizewell C), I feel there is too much unnecessary stress being put on the local community already. Traffic has already increased! There are brownfield sites that could be used, or you could build offshore as in Europe. All of the proposed sites were on farmland, why?	As set out in Application **Document 8.1 Corridor and Preliminary Routeing and Siting Study [APP-386]** due to land use of the routeing and siting study area for the Proposed Project which was defined by the Needs Case as set out in **7.2 Strategic Options Back Check Report [APP-320]**, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Where a brownfield site existed within the routeing and siting study area this was appraised as set out in **Document 8.1 Corridor and Preliminary Routeing and Siting Study [APP-386]**. It is acknowledged that consultees have long advocated for an integrated offshore grid over the pre-application stage of the Proposed Project. The Applicant is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network. It is recognised that In Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station. This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
4.22.3	The cable route itself will cause much more farmland to be less effective too. Wheat will never grow over the top of the cable route as it needs a cold spell to go through the changes necessary to produce the ears of grain. The ground under a cable route is always warmer than the rest of the nearby ground.	In response to the landowners concerns regarding underground cable temperatures, **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-018]** highlights that cement bound sand or other thermally suitable material will be used around the cables/ducts and states that this will be done to avoid the alteration of local environmental temperatures around the cables.
4.22.4	The proposed site at Wood farm is on prime agricultural land. This is due to a glacial plane that pushed thousands of tonnes of prime top soil over the whole of the farm, the glacier then got stuck, then as the ice melted the topsoil was left behind as well as several large pits dotted around the area. The area they want is 185 acres of well drained land, which would cost half a million pounds if it had to be re drained today. It is a well maintained farm which produces high yields year on year and would continue to do so in the future given the chance. Any crop can be grown on this farm; the land is that good. It will put farmers like me out of business, and this is a farming community	The applicant acknowledges the concerns on land drainage. **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows: "*Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.*" This would be secured through **DCO Schedule 3, Requirement 6**. The detail can be found in **Application Document 7.5.3.1 CEMP Appendix A - Outline Code of Construction Practice [APP-341]** and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction. **Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils (PDA-019)** present the assessment of the likely significant agriculture and soils effects that could

Reference	Summary of relevant representation	Applicant's Response
		result from the Proposed Project, including impacts associated with temporary and permanent land take. It also sets out how policy generally seeks to minimise agriculture and soils effects from development and to avoid significant adverse effects. This applies particularly to the protection of best and most versatile (BMV) land, defined as comprising Grades 1, 2, and 3a agricultural land, and soil ecosystem services. In addition an Outline Soil Management Plan has been produced [**APP-356**] to ensure the effective management, protection, and reinstatement of soil resources. The plan outlines the necessary measures to minimise soil degradation and promote sustainable land use in accordance with best practice and regulatory requirements.

~~Table 4.23~~

Table 4.23 Applicant's Response to the Relevant Representation of Simon Gilbey on behalf of Ian Rix

Reference	Summary of relevant representation	Applicant's Response
4.23.1	The farm extends in total to approximately 202 hectares and comprises arable land, a duck rearing enterprise, Christmas trees, a range of commercial buildings, and residential property and an events barn used for weddings and retail sales (during the Christmas period). Mr I C Rix is identified within the Book of Reference as National Grid are proposing to acquire both temporary and permanent rights over his land to facilitate the laying of both AC and DC cables associated with the Sea Link Project; • Class 1 – Acquisition of Land • Class 2 – Overhead Line • Class 3 – Underground Cables • Class 5 – Access • Class 6 – Drainage • Class 7 – Mitigation • Class 8 - Temporary Construction At the time of this submission, our client is engaged in ongoing discussions with the agents' for National Grid, Dalcour Maclaren, with whom we are seeking to agree terms for the rights identified by National Grid to deliver the Project.	The Applicant acknowledges the extent and nature of Mr Rix's land holdings and operations and welcomes his engagement with the Proposed Project. The Applicant confirms that the landowner has interests in the following land plots: 2/6 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/7 - Class 1. Compulsory Acquisition of Land 1/67 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/64 - Class 5. Compulsory Acquisition of Rights - Access 1/58 - Class 6. Compulsory Acquisition of Rights - Drainage 1/63 - Class 7. Compulsory Acquisition of Rights - Mitigation 1/62 - Class 5. Compulsory Acquisition of Rights - Access 2/5 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 1/49 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 1/66 - Class 7. Compulsory Acquisition of Rights - Mitigation 2/36 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/35 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/58 - Class 1. Compulsory Acquisition of Land 2/13 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/71 - Class 1. Compulsory Acquisition of Land 2/57 - Class 1. Compulsory Acquisition of Land 2/70 - Class 1. Compulsory Acquisition of Land 2/37 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/20 - Class 1. Compulsory Acquisition of Land 2/47 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/38 - Class 5. Compulsory Acquisition of Rights – Access 2/48 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/42 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/59 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/11 - Class 5. Compulsory Acquisition of Rights - Access 2/46 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/99 - Class 7. Compulsory Acquisition of Rights - Mitigation 1/71 - Class 5. Compulsory Acquisition of Rights - Access 2/15 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/72 - Class 6. Compulsory Acquisition of Rights - Drainage 1/70 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/16 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/69 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 1/73 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure

Reference	Summary of relevant representation	Applicant's Response
		2/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/17 - Class 7. Compulsory Acquisition of Rights - Mitigation 2/14 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/19 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 1/61 - Class 5. Compulsory Acquisition of Rights - Access 1/50 - Class 5. Compulsory Acquisition of Rights - Access 1/54 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/68 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/12 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 1/65 - Class 5. Compulsory Acquisition of Rights - Access 2/3 - Class 5. Compulsory Acquisition of Rights - Access 2/53 - Class 5. Compulsory Acquisition of Rights - Access 2/49 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/43 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/40 - Class 5. Compulsory Acquisition of Rights - Access 2/2 - Class 5. Compulsory Acquisition of Rights - Access The Applicant's agent, Dalcour Maclaren, have engaged with Mr Rix and their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Rix's agent in meetings throughout February. Populated Heads of Terms were issued on 27th March 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Rix's agent on 15 April 2025 and 22nd August 2025. Dalcour Maclaren have continued discussions with Mr Rix's agent regarding the Heads of Terms. Dalcour Maclaren met with Mr Rix and his agent on 8th September and 3rd November to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.23.2	Whilst we have previously submitted representations to National Grid regarding matters arising from the scheme, most notably the cable route, which is proposed pass directly through our clients' Christmas tree plantation, sterilising the easement width from future re-planting, this submission focuses on the proposal to undertake mitigation planting within Plots 1/63 and 1/66. On at least two occasions, our client has taken representatives from National Grid to inspect Plots 1/63 and 1/66 and has explained that; a. tree and / or hedge planting at this location will achieve little by way of landscape mitigation due to the surrounding topography; b. such works would add to what is already a dangerous stretch of road that floods and then freezes during the winter months, by casting further shade on the road;	The proposed hedgerow and tree planting within Plots 1/63 and 1/66 form part of the wider landscape and visual mitigation measures presented in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk {APP-348 superseded by AS-059}.** These are an essential part of the mitigation hierarchy to reduce effects on landscape character and visual amenity. These measures seek to integrate the Project into the existing landscape pattern, replacing landscape features and habitat which are going to be lost and strengthen the existing landscape framework of the site. A feature of the wider landscape is the layered network of vegetation which comprises hedgerows, trees and woodland blocks. To assimilate the converter station into the landscape and to partially screen it within views, a combination of landscape mitigation measures are proposed. Firstly, providing woodland planting immediately around the converter station compound and secondly providing additional hedgerow and tree planting along the B1119 to assist in creating an additional vegetated layer within the immediate landscape and views. The native hedgerow and tree planting along the B1119 which partly lies within Plots 1/63 and 1/66 will have the following function:

Reference	Summary of relevant representation	Applicant's Response
	c. planting trees and / or a hedge at this location will obscure drivers from being able to see the Christmas tree plantations, which help promote our clients' enterprise, and further will in due course restrict his ability to erect temporary signage advertising Christmas tree sales during November and December. d. planting along the field side of the ditch, noting that the ditch can only be cleaned out / scaped back from the adjoining land, will impact on future maintenance of the ditch and has the potential to cause greater flooding and an accident blackspot.	• Create a vegetated layer within the landscape and partially screen views of the converter station from receptors (properties, recreational routes and users of the road network) to the north and north-west; • Provide a degree of screening for road users on the B1119 in particular those travelling towards Saxmundham; • Reinstate some of the historic hedgerow planting; • Provide ecological connectivity by linking areas of existing woodland and hedgerows; and • Provide areas of advanced planting to provide early establishment of vegetation. The hedgerow and tree planting along the B1119 have been developed through the pre-application stage with Suffolk County Council and East Suffolk Council where the planting is considered to be an essential component to the landscape mitigation. **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk {APP-348 superseded by AS-059}** identifies in section 6.6.1 that new hedgerows will be maintained to a height between 2.5 m and 3.5 m. This height is not considered to entirely screen the Christmas tree plantation beyond. The Order Limits within Plots 1/63 and 1/66 allow sufficient width to accommodate the existing road drainage ditch and the hedgerow and tree planting with assumed maintenance of the drainage ditch from the road. As a result of ongoing discussions with the landowner, it is understood that the drainage ditch is not maintained from the road but from the landowner's land. As a result, the Proposed Design Change along the B1119 would extend the Order Limits within Plots 1/63 and 1/66 to allow continued maintenance of the drainage ditch from these Plots along with the hedgerow and tree planting and sufficient access for their maintenance. There would also be sufficient space to erect temporary signage advertising Christmas Tree sales.
4.23.3	The engineers from National Grid who we have met on site agreed that planting up this section of the field provided little mitigation and agreed that it should be removed from the DCO application, and yet it has remained. It is our clients' request that the Planning Inspector removed Plots 1/63 and 1/66 from the DCO. Photographs of the road, ditch line and adjoining land are to be sent direct to the Planning Inspectorate Project Team together with a full copy of the above submission.	The proposed hedgerow and tree planting within Plots 1/63 and 1/66 form part of the wider landscape and visual mitigation measures presented in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk {APP-348 superseded by AS-059}.** These are an essential part of the mitigation hierarchy to reduce effects on landscape character and visual amenity. These measures seek to integrate the Project into the existing landscape pattern, replacing landscape features and habitat which are going to be lost and strengthen the existing landscape framework of the site. A feature of the wider landscape is the layered network of vegetation which comprises hedgerows, trees and woodland blocks. To assimilate the converter station into the landscape and to partially screen it within views, a combination of landscape mitigation measures are proposed. Firstly, providing woodland planting immediately around the converter station compound and secondly providing additional hedgerow and tree planting along the B1119 to assist in creating an additional vegetated layer within the immediate landscape and views. The native hedgerow and tree planting along the B1119 which partly lies within Plots 1/63 and 1/66 will have the following function: • Create a vegetated layer within the landscape and partially screen views of the converter station from receptors (properties, recreational routes and users of the road network) to the north and north-west; • Provide a degree of screening for road users on the B1119 in particular those travelling towards Saxmundham; • Reinstate some of the historic hedgerow planting;

Reference	Summary of relevant representation	Applicant's Response
		• Provide ecological connectivity by linking areas of existing woodland and hedgerows; and • Provide areas of advanced planting to provide early establishment of vegetation. The hedgerow and tree planting along the B1119 have been developed through the pre-application stage with Suffolk County Council and East Suffolk Council where the planting is considered to be an essential component to the landscape mitigation. The Order Limits within Plots 1/63 and 1/66 allow sufficient width to accommodate the existing road drainage ditch and the hedgerow and tree planting with assumed maintenance of the drainage ditch from the road. As a result of ongoing discussions with the landowner, it is understood that the drainage ditch is not maintained from the road but from the landowner's land. As a result, the Proposed Design Change along the B1119 would extend the Order Limits within Plots 1/63 and 1/66 to allow continued maintenance of the drainage ditch from these Plots along with the hedgerow and tree planting and sufficient access for their maintenance.

~~Table 4.24~~

Table 4.24 Applicant's Response to the Relevant Representation of Simon Nicholas Fulford

Reference	Summary of relevant representation	Applicant's Response
4.24.1	The cumulative impact of this project which was not properly discussed in the application made by SPR in Friston was a scandalous omission if not a denial. Therefore, this application in conjunction with the existing projects including Sizewell C will have a devastating impact on the wider area of East Suffolk but in particular the village of Friston will be subjected to an extraordinary strain of at least three enormous cable routes and infrastructure.	The Applicant thanks Mr Fulford for his representation and will continue to engage in respect of the land rights required to facilitate the proposed project. The Applicant acknowledges that both Mr and Mrs Fulford have made relevant representations as joint landowners – Ms Nicola Fulford RR reference – 3978. The Applicant confirms Mr Fulford has an interest in plots in Suffolk; 2/31 - Class 9. Temporary Use for Access 2/28 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/29 - Class 9. Temporary Use for Access 2/32 - Class 9. Temporary Use for Access Nicola Suzanne Fulford Friston House Friston Saxmundham IP17 2/33 - Class 2. Compulsory Acquisition of Rights - Overhead Line 2/26 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/30 - Class 9. Temporary Use for Access. The Applicant proposes to use their existing land rights (Deed of Easement) for works to the existing overhead line on land owned by Mr Fulford. If this position changes, the Applicant's agent, Dalcour Maclaren, will engage with Mr Fulford to secure any necessary rights. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**
4.24.2	The EA1 and 2 enquiry clearly detailed how sensitive this site was to development, stating that extreme care should be taken in its implementation. That verdict was reached without consideration for Sealink or Lionlink or any other non disclosed projects then or now. To consider Sealink in isolation without at least requiring reference to any and all projects intended to follow would be repeating the scandalous process that has already been witnessed.	The SPR projects East Anglia ONE North and East Anglia TWO have been assessed based on the information that was available at the time for the Proposed Project and other energy infrastructure projects. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** provides an assessment of the cumulative effects of the Proposed Project alongside those that are already consented and based on available information for those proposed in the surrounding area. As part of its submission, the Applicant has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363].**

Table ~~4.25~~ 4.25 Applicant's Response to the Relevant Representation of T J Haworth

Reference	Summary of relevant representation	Applicant's Response
4.25.1	Dear Case Team, SEA LINK DCO APPLICATION RELEVANT REPRESENTATION	The Applicant thanks Ms Haworth for their representation and will continue to engage in respect of the land rights required to facilitate the proposed project. The Applicant confirms Ms Haworth has an interest in plots in Suffolk: 5/3 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 5/6 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/5 - Class 3. Compulsory Acquisition of Rights - Underground Cable System The Applicant's agent, Dalcour Maclaren, have engaged with Ms Haworth and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Ms Haworth's agent in meetings throughout February. Populated Heads of Terms were issued on 28 February 2025 and subsequently revised versions of the Heads of Terms were issued to Ms Haworth's agent on 15th April 2025 and 22nd August 2025. Dalcour Maclaren have continued discussions with Ms Haworth's agent regarding the Heads of Terms. Dalcour Maclaren emailed Ms Haworth's agent on 10th September 2025 and 15th October 2025 requesting a meeting to discuss Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**
4.25.2	Please accept this response to the Planning Inspectorate. I wish to register my concern and dissatisfaction with the lack of engagement and detail provided by NGET.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. The Applicant has complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory' standard to the Secretary of State. The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the **Notification of Decision to Accept Application [PD-001]** issued on behalf of the Secretary of State on 23 April 2025
4.25.3	While supportive in principle of wind-generated renewable energy, is unequivocal in its opposition to this project as currently proposed. In alignment with the views of other submissions made by impacted Town and Parish Councils, RSPB, Alde & Ore, other statutory bodies and experts, I firmly believe that more sustainable and less intrusive solutions are both possible and preferable. Given the strategic significance of East Anglia in national energy production, I request a comprehensive review of this scheme within the broader context of regional energy planning at Central Government level.	NPS EN-1 identifies a need for a '*substantial reinforcement in the East Anglia area*', which is clearly significant in setting the context for the need for the Proposed Project. Part 4.2 of NPS EN-1 further identifies a '*critical national priority for low carbon infrastructure'* that specifically includes energy infrastructure projects that are directed into the NSIP regime under section 35 of the Planning Act 2008 : '*such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore*' (Glossary section of NPS EN-1) Reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives**

Reference	Summary of relevant representation	Applicant's Response
	I share the view of Suffolk County Council that the application process has been flawed; key issues have not been properly explored at the pre-application stage, leaving the current submission incomplete and premature for Development Consent consideration. The cumulative impact of this project—especially when considered alongside other major energy infrastructure initiatives such as Sizewell C Nuclear Power Station, SPR's NSIPs, and potentially Lion Link—has not been adequately assessed.	**Considered [APP-044]** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** provides an assessment of the cumulative effects of the Proposed Project alongside those that are already consented and based on available information for those proposed in the surrounding area. As part of its submission, the Applicant has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363].**
4.25.4	There is particular concern about the overlapping construction periods of these projects, which could collectively lead to significant negative impacts, including increased traffic congestion, reduced access to essential services for residents, and a further decline in tourism—a sector vital to the economic health of the coastal region. It must be recognised, and without doubt that reputational damage may never recover.	Potential cumulative effects with other developments proposed in the area have been assessed following cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This assessment has considered traffic, socio-economic and health and wellbeing factors. In terms of traffic, a comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considered other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink, and the potential cumulative impacts on the surrounding highway network including with respect to Severance, Driver Delay and Road Safety. The assessment concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments. The Applicant is committed to ongoing engagement with other projects to identify potential opportunities for coordination during project delivery and to minimise potential highway impacts, and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. The Applicant remains in consultation with SCC Highways to ensure cumulative impacts are appropriately managed. The Applicant notes concerns regarding the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, the Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**.

Reference	Summary of relevant representation	Applicant's Response
		The Applicant acknowledges concerns regarding the impact of the Proposed Project on mental wellbeing. The assessment of health and wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a "state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity". The IEMA guidance outlines that both physical and mental health should be considered "across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes", and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Therefore, mental health is considered in the EIA under the existing health determinants in the IEMA guidance, with particular relevance given to the following: • Access to healthcare services and other social infrastructure; • Access to open space, leisure and play; • Transport modes, access, connections and physical activity; and • Social cohesion and community identity. It is deemed that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** concludes that there are no anticipated significant effects as a result of the Proposed Project. The Applicant notes concern regarding the potential impact of construction workers on local housing. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** conducts an assessment to evaluate whether existing visitor and tourism accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. Given the limited scale of labour demand, the assessment concludes that there is sufficient capacity for the construction workforce within existing visitor and tourism accommodation and therefore there is not anticipated to be a [significant] impact on local housing in the private sector. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. The Applicant acknowledges the concern raised with regards to the cumulative impact of the Project on the availability of the labour force and in turn the cost of resources. Within the 60-minute travel area, there are approximately 26,550 people employed in the construction sector. The Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff. Under a worst-case scenario whereby all 327 FTEs are employed from the existing construction labour pool within the study area, the assessment concluded that there would be no significant effects on labour supply.

Reference	Summary of relevant representation	Applicant's Response
4.25.5	The closures and diversions of Public Rights of Way, housing pressures, soaring costs related to materials and skilled labour, and a range of knock-on socio-economic and mental health effects all require much deeper consideration.	In terms of Public Rights of Way (PRoW), diversion routes have been identified where any temporary PRoW closures will be required. These details are set out in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352].** It is proposed to temporarily divert several PRoW during the construction phase. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. Short term temporary diversions will last four weeks, and long-term temporary diversions will be in place over the full construction phase. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** outlines a comprehensive approach to managing controlled crossings, traffic marshals, and signage during the construction phase in Suffolk. Controlled crossings will be implemented where PRoW intersect with temporary access tracks, using signage to alert both PRoW users and construction vehicle drivers. At busy crossing points, traffic marshals (banksmen) may be deployed to assist users, ensuring safe passage and minimal disruption. Where marshals are not present, construction vehicle drivers will be responsible for temporarily closing and reopening gates to maintain separation between the public and construction vehicles. Signage will be strategically placed to inform users of construction activities, diversions, and closures, with advance notice provided to prevent inconvenience. These signs will include contact details for the community relations team and be coordinated with SCC officers to ensure consistency and visibility across the Proposed Project area.
4.25.5	Furthermore, I concur with others and point to the Lion Link project's earlier decision to rule out Aldeburgh as a potential site and contends these findings should equally apply to the present Sea Link proposal. I take issue with the PIER's apparent minimisation of the disturbance to the livelihoods of thousands whose economic wellbeing depends on an estimated £350 million tourism industry. The irreplaceable value of the National Landscape, including its protected areas and much-loved walking routes, must not be underestimated or discounted.	The Applicant notes concerns regarding the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, the Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document **6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. In addition, the Applicant recognises the value of PRoW and recreational trails to local tourism. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: - the quality of user experience; - quality of the route; - purpose of usage; and

Reference	Summary of relevant representation	Applicant's Response
		- potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated.
4.25.6	Lastly, I remain deeply concerned over the risk of environmental damage to aquifers and to both natural and built coastal defences, especially given the lack of an accessible and robust Disaster Management Plan. The Landfall site's location in a highly visible and ecologically sensitive zone—impacting the Sandlings Special Protection Area, North Warren RSPB Reserve, and SSSI—makes rigorous scrutiny and community engagement imperative	Section 5.7.24 of **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** identifies the aquifer designations of the bedrock geology, which includes the presence of the Crag Group Principal Aquifer and the Waveney and East Suffolk Chalk and Crag groundwater body. Both the Geology and Hydrogeology Chapter and A**pplication Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]** identified the presence of cohesive superficial deposits overlying the Crag Group along large parts of the Proposed Project route which act to protect the deeper more sensitive Principal Aquifer. The assessment in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concluded that with the proposed mitigation, potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are minor (and therefore not significant). As described in Section 5.8.4 of **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]**, the proposed mitigation includes Commitment GH02 which requires a Foundation Works Risk Assessment to be undertaken where piled foundations are required, and at trenchless crossings, in accordance with Environment Agency guidance. The same document also includes commitment GH09 which requires a Hydrogeological Risk Assessment to be carried out where indicated. A groundwater risk assessment has also been presented as **Application Document 6.3.2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** which has assessed the potential risks to groundwater receptors with regard to levels, quality and flows. The assessment in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concluded that potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are negligible (and therefore not significant). The issue of potential effects upon flood defences was highlighted in **6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation [APP-047]** and drilling depths will be below on such obstacles.Nonetheless, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** indicates that an Incident Response Plan will be developed by the contractor for the construction phase. This will be prepared prior to construction works commencing and thereafter complied with. It will outline procedures that will be implemented in case of unplanned events, including but not limited to site flooding, pollution incidents and flood defence damage contingencies. Local authorities will be informed of any large-scale incidents under the Incident Response Plan. Smaller scale issues will be recorded in a register that will be made available to local authorities for review on request. While concerns about the absence of a Disaster Management Plan are noted, the Applicant regards safety as fundamental to its operations. We are in regular contact and coordination with both Sizewell B's ongoing operations and Sizewell C's construction activities. Through this coordination precautions are in place for a nuclear accident and this is led by Sizewell. We will fall in line with their recommendations and emergency plans. Acknowledging concerns about the ecological sensitivity of the area around the Proposed Project's landfall, **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** is an Outline Landscape and Ecological Management Plan (LEMP) and its proposals are therefore outline in nature. It will be replaced by the final LEMP following grant of DCO and prior to works commencing, in and will need the approval of the relevant Local Planning Authorities (LPAs).

Reference	Summary of relevant representation	Applicant's Response
		All mitigation measures are secured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**, and the Proposed Project is only seeking consent for trenchless techniques at the landfall, not open cut. It would not legally be possible to 'fall back' on open trenching without an amendment to the DCO. Section 7 of **Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [AS-059]** contains detailed monitoring proposals.
4.26.7	I therefore formally register my concerns and dissatisfaction with the level of engagement and transparency provided by NGET, reiterating the need for genuine dialogue and a genuinely sustainable path forward.	The Applicant reiterates its commitment to ongoing engagement with affected landowners.

~~Table 4.26~~

Table 4.26 Applicant's Response to the Relevant Representation of The Marquess Conyngham

Reference	Summary of relevant representation	Applicant's Response
4.26.1	My client owns foreshore and manorial rights effected by this scheme.	The Applicant acknowledges the representation and notes the Marquess has an unconfirmed interest in the River Stour and the Foreshore at Pegwell Bay. The Applicant confirms the interest in land to be plots in Kent: 5/11 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 5/12 - Class 3. Compulsory Acquisition of Rights - Underground Cable System 2/61 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/57 - Class 2. Compulsory Acquisition of Rights - Overhead Line; Open Space (River Stour Navigation) 2/92 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/86 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/103 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/68 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/106 - Class 2. Compulsory Acquisition of Rights - Overhead Line; Open Space (River Stour Navigation) 2/64 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/100 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/62 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure; Open Space (River Stour Navigation) 2/6 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 2/67 - Class 2. Compulsory Acquisition of Rights - Overhead Line The Applicant will engage with the representatives of Marquess Conyngham to confirm the interests and engage in respect of the voluntary land rights sought for the project. The Applicant's agent, Dalcour Maclaren, issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with The Marquess Conyngham's agent in meetings throughout February. Populated Heads of Terms were issued on 3 March 2025. Dalcour Maclaren have continued discussions with The Marquess Conyngham's agent regarding the Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**.

Table ~~4.27~~ 4.27 Applicant's Response to the Relevant Representation of Joan Veronica Spanton

Reference	Summary of relevant representation	Applicant's Response
4.27.1	My client is the freehold owner of land located within the Order Limits of the Applicant's Development Consent Order (DCO) application.	The Applicant thanks Ms Spanton's agent for the representation and can confirm the land interest in plots (Kent): 4/27 - Class 9. Temporary Use for Access 4/10 - Class 5. Compulsory Acquisition of Rights – Access 3/61 - Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/60 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/25 - Class 9. Temporary Use for Access 3/59 - Class 5. Compulsory Acquisition of Rights – Access 3/65 - Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/26 - Class 9. Temporary Use for Access The Applicant's agent, Dalcour Maclaren, have engaged with Ms Spanton and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued in March 2025 and subsequently revised versions of the Heads of Terms were issued to Ms Spanton's agent on 29th October 2025. Dalcour Maclaren have continued discussions with Ms Spanton's agent regarding the Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests**
4.27.2	The Applicant intends to acquire a right of access over my client's property and has initiated written correspondence seeking a "voluntary agreement" on Heads of Terms for a Deed of Grant. However, there is no confidence that the Applicant is genuinely seeking to reach common ground. Based on correspondence received via Dalcour Maclaren, it appears that the only concession the Applicant is willing to make is to clarify the extent of the Grantor's land. We therefore believe the Applicant is not seriously exploring alternatives to compulsory acquisition, such as acquisition by agreement. Although the Applicant has been informed that my client has appointed BTF as their agent, we have yet to receive any acknowledgment or direct communication. As such, we do not consider that the Applicant is taking adequate steps to engage with affected parties.	The Applicant has standard terms upon which it seeks to acquire land and rights necessary. The guidance can be found at Land Rights Strategy and Payment Schedule for Assets: (https://www.nationalgrid.com/document/355026/download) which explains the rationale. The Applicant's agent, Dalcour Maclaren, have engaged with Ms Spanton and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. Populated Heads of Terms were issued in March 2025 and subsequently revised versions of the Heads of Terms were issued to Ms Spanton's agent on 29th October 2025. Dalcour Maclaren have continued discussions with Ms Spanton's agent regarding the Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests** The **Statement of Reasons AP-012** sets out more details on the approach toward compulsory purchase including the use of the powers and why they are both legitimate and proportionate. They are to facilitate works No's 7 and 8 in Kent which can be described as an underground electric line connection in Kent and Kent temporary work compounds. The Permanent rights of access are to ensure the underground assets can be inspected and maintained post construction.

Reference	Summary of relevant representation	Applicant's Response
		Compulsory Powers are only sought in respect of Plots 4/10, 3/60, 3/59, 3/65. The Applicant is seeking temporary possession over the remaining plots to facilitate the construction of the project. The Applicant is actively seeking to secure the necessary rights through voluntary agreement to negate the need to use or rely on any of the compulsory powers applied for. Its Land Rights Strategy sets out why the voluntary rights sought must be on a consistent basis and that they are applied across the board to all DCO, CPO and voluntary negotiations.
4.27.3	My client is concerned that the proposed use of their property for access will cause unacceptable disruption to their quiet enjoyment of the land, including through noise, dust, vibration, and air pollution. Furthermore, the grant of permanent access rights is likely to result in a significant devaluation of the property.	The assessment within **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]** has considered all potential emissions to air for each phase of the Proposed Project. Temporary air quality impacts due to construction vehicle, dust, and Non-Road Mobile Machinery (NRMM) emissions during the construction and decommissioning phases of the Proposed Project have been considered in addition to vehicle emissions and emissions from the substation and converter station back-up generators during the operation and maintenance phase. All impacts have been assessed in accordance with best practice guidance, and the methodology was discussed with KCC, Thanet District Council and Dover District Council. Detailed modelling of construction vehicles has been undertaken; all modelled concentrations were below the relevant standards and changes as a result of the Proposed Project were predicted to be negligible. With the implementation of the relevant mitigation measures, all effects have been determined to be not significant. The Proposed Project incorporates measures to control noise and vibration, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and Outline Noise and Vibration Management Plans (**Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent [APP-351]**). Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007]**. The proposed project will be fully compliant with the compensation code where diminution in property prices can be demonstrated to have been caused. The code sets out the parameters and evidence needed to substantiate a claim for diminution in value and when this happens. The UK Government has also produced a series of plain English general guides to compulsory purchase and compensation which you may find useful: Compulsory purchase and compensation – www.gov.uk Guidebooks 1 and 4 being the most appropriate.

~~4.28~~

Table 4.28 Applicant's Response to the Relevant Representation of James Henry Rodgers

Reference	Summary of relevant representation	Applicant's Response
4.28.1	I write on behalf of JAMES HENRY ROGERS, of (Redacted) for whom we are instructed to act, to advise that the land identified as Land Parcel 2/19, through which it is proposed the cables will be laid, is subject to an Option Agreement with Cambridge Power Limited for the development of a Battery Energy Storage Site.	The Applicant thanks Mr Rogers' agent for the representation and confirms that his interest in land plot in Suffolk: 2/19 - Class 3. Compulsory Acquisition of Rights - Underground Cable System. The Applicant's agent, Dalcour Maclaren, have engaged with Mr Rogers and/or their agent in relation to ongoing survey works throughout 2023-2025. Dalcour Maclaren issued template Heads of Terms to landowners and their appointed agents in January 2025. The template Heads of Terms and rights being sought were discussed with Mr Rogers' agent in meetings throughout February. Populated Heads of Terms were issued on 6 March 2025 and subsequently revised versions of the Heads of Terms were issued to Mr Rogers' agent on 15 April 2025 and 22 August 2025. Dalcour Maclaren met with Mr Rogers and his agent via Teams on 9 September. Dalcour Maclaren have continued discussions with Mr Rogers' agent regarding the Heads of Terms. Further detail of engagement is set out in **Application Document 4.2.2 Statement of Reasons Appendix B Schedule of Negotiations with Land Interests.**
4.28.2	Although to date, National Grid have been unable to provide detailed guidance as to where the proposed cable route is to run within Land Parcel 2/19, it is requested that they should be required to take account of the presence of the Option Agreement and look to minimise sterilisation of the land by ensuring that; (a) the cable route is located tightly into the south-western corner of the Land Parcel (if not avoiding it altogether) and (b) that the area of land sterilised by the proposed work associated with the development of the Project does not impede or limit the development of the Battery Energy Storage Site. A showing the extent of the Option Site will be submitted separately to the Planning Inspectorate by email.	The cables will be laid within the limit of deviation shown in the **works plans (Suffolk) APP-021**. The works are shown in the southwest corner of the land parcel. The Applicant requests that Mr Rogers' agent can provide a copy of the completed option agreement with Cambridge Power Limited in addition to the plan. It is noted from the TEC register Cambridge Power Limited have a proposed 249 MW energy storage connection at Red House Farm currently in scoping and anticipated to be generating from 2034.

~~Table 4.29~~ Table 4.29 Applicant's Response to the Relevant Representation of Erik Collins

Reference	Summary of relevant representation	Applicant's Response
4.29.1	We are situated within the compulsory acquisition of rights boundary, YET OUR PROPERTY HAS BEEN OMITTED FROM ALL DOCUMENTS. Document (6.2.3.12) 1.7.24 showing residents – states "Minster which is located approximately 300 m to the north of the Marsh Farm Road proposed access route". We believe at this point it is fair for us to appoint a solicitor at National Grid's expense to ensure the boundaries are correct.	The Applicant appreciates Mr. Collins' representation and will continue engagement to discuss the project. The Applicant can confirm that Mr. Collins holds Category 2 and Category 3 interests in Kent land plots 2/81 and 2/82 (Class 5: Compulsory Acquisition of Rights – Access). The Applicant's land agents (Dalcour Maclaren) will arrange a meeting to address these matters.
4.29.2	Our property is at the end of (Redacted) which is a 1km single track road with no passing places to reach the village. We are concerned that we will not have ease of access and obstructions preventing our daily use. It is noted in document (7.5.9.2) TE35 "To be managed as a shared access route it is estimated that up to ten HGV movements could use Marsh Farm Road each day". Which is a substantial amount of HGV traffic for us to manage daily. This will also impact on local businesses and residents as traffic will be going through the village from 07.00-19.00hrs 7 days a week while the project is being developed.	**Application Document 6.2.3.7 Environmental Statement Part 3 Kent Chapter 7 Traffic and Transport [APP067]** 7.4.52 states that '*A very low proportion of construction vehicles (circa 1% in total, and less than 1% HGVs) is expected across the remaining access points which comprise K-BM03 (Jutes Lane), K-BM04 (Marsh Farm Road) and K-BM05 (Whitehouse Drove).'* This reflects the anticipated low use expected for the Marsh Farm Road access as it is required for limited works only. Marsh Farm Road is to be used to access the Applicants existing infrastructure for minor alterations and to provide access to construct a temporary tower and associated temporary works for the temporary diversion of the overhead line. These activities will require access over relatively short durations; the numbers of construction vehicles will be low and the movement of HGVs down the single lane road will be controlled by the contractor. Access to properties and businesses will be retained throughout the project.
4.29.3	Our boundary shows a number of trees to be removed or cut back in the arboriculture survey. We would like to discuss exact requirements before any removal takes place.	The Applicant welcomes ongoing engagement with affected landowners. **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]** identifies trees likely to be removed to facilitate the Proposed Project and these are detailed in Appendix D Tree Survey Schedule Kent Onshore Scheme and Appendix F Tree Protection Plans Kent Onshore Scheme. Where practicable the detailed design will be further developed to avoid or minimise impacts to trees. The final level of arboricultural impacts will be assessed and recorded as part of an Arboricultural Method Statement which will be secured via the DCO Schedule 3 Requirement 8 (Application Document 3.1). This document has been superseded by **AS-087.**
4.29.4	It is concerning to discover these details on maps and documents and to not have received any information from National Grid directly.	The Applicant confirms that Mr. Collins was consulted and received all relevant documentation and notices during the pre-application stage of the project including the s.44 and s.56 letters and notices. The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination.
4.29.5	The Sea Link DCO documents are not clear and inadequate for our purpose of discovering how our property will be affected, we have not been consulted and can	The Applicant will continue to engage with affected landowners over the course of the examination in order to understand and address their concerns.

Reference	Summary of relevant representation	Applicant's Response
	not guarantee we have yet covered off all concerns and would like the opportunity to follow up should information become clearer.	The Applicant can also confirm they have complied with the pre-application procedures set out in of the Planning Act 2008 as well as the application being of a 'satisfactory standard for the planning inspectorate to accept the application for examination The fact that the DCO application for the Proposed Project is in accordance with these statutory requirements is confirmed in the **Notification of Decision to Accept Application [PD-001]** issued on behalf of the Secretary of State on 23 April 2025
4.29.6	With regard to Application Reference EN020026 the map order location and key plan – Kent, Why is it printed so small that no detail can be read.	Online application documents are scaled. Documents are converted to PDF at a high resolution, allowing interested parties to zoom in and read details shown.
4.29.7	Noise and dust pollution, as our property is with the compulsory acquisition of rights boundary, we will be subjected to constant noise and dust from 07.00-19.00hrs 7 days a week while the project is being constructed and then a constant hum from the mask after completion, we know this will be so as we had to endure the noise and dust pollution during the Nemo Link construction, why so soon after the Nemo Link project ended is the need for Sea Link project, why couldn't these have been amalgamated into one project. Pollution and debris running into the River Stour	The Applicant acknowledges the concerns of the landowner and has assessed the potential amenity impacts in this area and upon wider community receptors in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing. This document is superseded by AS-003**. The assessment considers potential effects such as noise, dust, traffic, and visual disturbance that could influence health and wellbeing. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on residents and local community assets arising from construction of the Suffolk Onshore Scheme. The Study Area used in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] cover the local wards of Cliffsend & Pegwell and Thanet Villages, both located in Thanet District, and Little Stour & Ashtone, located in Dover District. This ensures that residents and landowners within and immediately surrounding the construction footprint are included in the assessment. The methodology adopted a holistic but locally sensitive approach, considering potential effects on both the wider community and those located closest to construction activities. Accordingly, the assessment presented in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] fully captures and addresses potential localised effects on nearby landowners, and the conclusions remain valid and proportionate. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in **CEMP Appendix A Code of Construction Practice [APP-341] and the CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** to reduce the potential for adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. In relation to air quality effects, these have been assessed and are presented within **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**. No likely significant air quality effects are predicted to occur as a result of construction or operation of the Proposed Project. **Application Document 7.5.6.2 Outline Air Quality Management Plan - Kent [APP-347]** outlines the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively.

Reference	Summary of relevant representation	Applicant's Response
		In relation to noise and vibration effects, these have been assessed and are presented within Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration [AS-111]. No likely significant residual noise and vibration effects are anticipated once mitigation measures (use of Best Practicable Means such as screening) are in place, during both construction and operation phases. **Application Document 7.5.8.2 (B) Outline Construction Noise and Vibration Management Plan - Kent [AS-133]** outlines the proposed construction noise and vibration management and mitigation measures. The NVMP will be updated by the contractor(s) prior to and during the works based on their specific methodologies and mitigation measures. The Applicant notes these concerns and is committed to working with the landowner to apply accommodation works to mitigate disruption where possible. The Applicant's Land Agent is in contact with this landowner and will compile a list of actions the Main Works Contractor will need to enact in order to help mitigate the effect of this project on the landowner.
4.29.8	For a second time it will impact on wildlife, bird strikes with vast increase in pylons at different heights crossing the River Stour at several points at known flight paths. SSSI Sites Pegwell Bay and the strip of land where they want to put the convertor station are supposedly designated protected land. Wet lands are one of the most important habitats for threatened wildlife in the UK with over 30 red listed birds thriving on Minster Marshes and Pegwell Bay plus bats, beavers and European eels.	Impacts on relevant designated sites for nature conservation, (including SSSIs and other European Designations), habitats and protected species (including breeding and wintering birds, bats, beavers and eels) have been robustly assessed and are presented within **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. An assessment of the potential for bird mortality as a consequence of collisions with the new proposed section of Overhead Line (OHL) in Kent is provided in Annex 2.F2 of **Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**. The assessment concluded that bird collision with the proposed OHL is likely to be a rare event which does not pose a significant risk to bird populations either associated with designated sites or important at a regional level (e.g. Kent). Irrespective of the above conclusions and notwithstanding the risk of collision being negligible, where the proposed OHL route crosses the River Stour, the deployment of bird deflectors will provide an extra layer of visibility, particularly in poor weather conditions. This commitment is secured through **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. It is not correct to say that the site of the proposed Converter Station is a designated site for nature conversation, rather the proposed Minster Converter Station and Substation will be located within an arable field.
4.29.9	With housing development on the increase Weatherlees sewage treatment plant will not be able to expand to cope with the additional housing with the proposed Sea Link infrastructure	The Applicant is unaware of any plans for the expansion of Weatherlees sewage treatment plant and notes that the proposed development is not immediately adjacent to the Weatherlees site.
4.29.10	With the 4 year estimated construction period will ruin our landscape and prevent Thanet people and visitors from accessing our limited landscape and will have an impact on local tourism.	Impacts on the landscape have been assessed and are reported within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**. The Applicant acknowledges some residual significant effects on landscape character and visual amenity are anticipated during the construction phase. Landscaping proposals, as presented within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan-Kent [PDA-035],** have been developed to respond to the design of the Proposed Project throughout its development. The embedded mitigation within the design has addressed visual effects wherever possible. In terms of impacts on recreation (including use of recreational routes such as PRoW) and tourism, these have been assessed within Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]. The assessment concluded that there are no likely significant residual effects in relation to the Kent Onshore Scheme on socioeconomics, recreation and tourism receptors during construction and operation with the

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		proposed mitigation in place. Mitigation includes measures set out within **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]** to maintain operation of impacted PRoWs.
4.29.11	An increased risk of security as energy infrastructure is the top target for attack, both actual and virtual.	As an operator of national infrastructure, the Applicant commits significant resources and investment into maintaining the security of their sites and assets. The Applicant liaises with the Department for Energy Security and Net Zero, other government departments and agencies, and law enforcement on security matters including the threat from hostile nation states, terrorism, and other security threats. Through these partnerships, appropriate protective security controls are identified and put in place to mitigate threats across their network. They follow government advice, industry standards and best practice, and the network is designed to allow for potential equipment failure or disruption and be able to continue to deliver safe, secure and reliable electricity. As new assets are built, significant changes are made to any site, or the threat landscape changes, security is considered/reviewed. The Applicant would be unable to comment further on security measures.

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