



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.71 Applicant's Written Response to Open Floor Hearing 2

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1. About This Document

1.0 Introduction

- 1.0.1 This document provides a written response to the oral submissions made by Interested Parties at Open Floor Hearing 2, held in Kent between Tuesday 11 November and Wednesday 12 November 2025, in relation to the Sea Link Project ('the Proposed Project').
- 1.0.2 The hearing was split into three sessions across the two days, commencing and concluding at the following times:
- Session 1, Tuesday 11 November: Start 2:00pm, closed 4:16pm
 - Session 2, Tuesday 11 November: Start 5:30pm, closed 6:38pm
 - Session 3, Wednesday 12 November: Start 10:00am, closed 12.12pm
- 1.0.3 The Applicant has summarised the topics, points and queries raised by Interested Parties at Open Floor Hearing 2. A detailed response against each topic has been provided.
- 1.0.4 The Applicant did not provide any oral submissions during Open Floor Hearing 2, but did attend all hearing sessions.
- 1.0.5 Alongside this document, the Applicant has submitted a separate document responding to the issues raised at Open Floor Hearing 1, held in Suffolk from Wednesday 05 November 2025 to Thursday 06 November 2025.

1.1 Scope of this Document

- 1.1.1 While the Applicant was not asked to provide any responses to submissions, the Applicant attended all of the Open Floor Hearings to listen to the representations made by the interested parties.
- 1.1.2 The Applicant took notes of all the points raised and in providing this response has cross-referenced these notes against the recordings and transcripts of the hearing sessions subsequently published on the Planning Inspectorate website [**EV5-002 – EV5-011**] to ensure accuracy and full understanding of the points raised.
- 1.1.3 In addition to the oral submissions, made in-person at the Open Floor Hearings, 208 written summaries of oral submissions made at hearings held w/c 3 and w/c 10 November 2025 were published on the Planning Inspectorate website [**REP1A-001 to REP1A-208**]. A number of further Written summaries of oral submissions were subsequently published as late submission on the Planning Inspectorate website. The Applicant can confirm that all these submissions have been reviewed and that this document also comprises the Applicant's Response to matters in these written summaries. This is in accordance with the Examining Authority's Procedural Decision set out in the **Rule 17 Letter** dated 28 November 2025.

1.2 Approach and methodology

- 1.2.1 In responding to the submissions made at the Open Floor Hearing 2, the Applicant has adopted a topic-based thematic approach.
- 1.2.2 All representations, both oral and written, have been thoroughly reviewed, and the key themes have been distilled from the notes, transcripts, recordings and written submissions. This response document aims to provide a proportionate response, focussing on the substance of the issues raised. By grouping related points together, this approach aims to deliver a comprehensive response to the matters discussed, avoiding unnecessary repetition and ensuring clarity for all interested parties.

1.3 Topics raised in oral submissions

- 1.3.1 Oral and written submissions have been categorised under the following themes and are responded to in alphabetical order:
- Agriculture and soils
 - Alternative options (general)
 - Alternative options (specific sites)
 - Alternative solutions (offshore grid)
 - Bat and bird mortality
 - Bird species
 - Bird surveys
 - Bird-specific mitigation
 - Climate-related impacts
 - Community benefits
 - Community impacts
 - Compulsory acquisition
 - Concerns about converter station location
 - Construction traffic impacts
 - Consultation and notification
 - Cost of development
 - Cultural heritage and historic significance
 - Cumulative impacts
 - DCO application
 - Electromagnetic interference

- Ecology
- Environmental policy and legislation
- Flood risk
- Ground conditions at Minster Marshes
- Ground conditions at the Thanet Hoverport
- Health and wellbeing
- Impact on recreation
- Impacts on the local economy
- Land drainage
- Landscape and visual impacts
- Loss of trees
- Migrating birds
- Mitigation proposals
- Needs case
- Nemo Link
- Noise, vibration and light pollution
- Risks to birds posed by pylons
- Security
- Tourism impacts
- Trenchless design

- 1.3.2 Section 2.1 presents written responses to the topics that have been addressed under the broader themes that are listed above. In addition, Section 2.2 provides direct responses to factual errors that the Applicant considers it necessary to rebut.
- 1.3.3 It is noted that as part of their written submissions, a number of interested parties included additional information in the form of maps, photographs and document extracts. This supplementary information has been reviewed and considered by the Applicant in its response.

2. Applicant's Written Response to Open Floor Hearing 2

2.1 Applicant’s Responses to Oral and Written Submissions – Thematic Responses

Table 2.1 Applicant’s response by theme

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
<p>Agriculture and soils:</p> <p>Speakers raised concerns around the loss of farmland from construction of the converter station, impacts on individual farms, the loss of Best and Most Versatile (BMV), food security and impacts through loss of environmental stewardship areas</p>	<p>National Grid is and will continue to work with all landowners including tenants who may be affected by the proposals, seeking to understand the impacts on their operations and to work with them as the construction programme is developed. National Grid will seek to work with the farming community to limit disruption where practicable.</p> <p>Whilst approximately 50% of the land within the Order Limits is likely to comprise BMV land, the majority of this land along the HVDC cable route will be reinstated to its previous condition, ensuring farming operations can continue post-construction. The final cable route and associated accommodation works will be discussed and agreed prior to commencement of construction to ensure disruptions to normal farming operations are limited. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]).</p> <p>Compensation claims for disturbance will be considered on an evidenced basis, and landowners and farmers will therefore be encouraged to keep records to support their claims.</p> <p>Potential impacts on agricultural land, including BMV land, have been assessed based on the final design presented within Application Document ES 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093].</p> <p>The agricultural use of land within the majority of the Order limits will only be impacted on a temporary basis, with agricultural uses able to continue following construction for land required for the installation of underground cables and temporary construction working areas. There would be 12.21 hectares of Best and Most Versatile land lost in Kent as a result of the Kent Onshore Scheme, the majority due to the construction of the new Minster Converter Station and Substation. No alternative sites were identified with a lower quality of agricultural land that performed as well from a practical perspective and when taking into consideration other environmental considerations. Agricultural Land Classification surveys are currently being completed to confirm the impact based on detailed survey data. This work will build upon the predictive mapping that was undertaken to support the initial application documents.</p> <p>Where productive land is lost as a result of the permanent infrastructure this impact needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy ‘Security of Supply’ and with helping the UK to meet its Net Zero target to reduce carbon emissions.</p>	<p>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils (Clean) [PDA-023].</p> <p>Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]).</p>
<p>Alternative options – general</p>		
<p>A large number of speakers expressed views that the Proposed Project has not considered or clearly presented a range of alternative options and locations for landfall and the converter station, including consideration of brownfield sites. Further</p>	<p>The suggestion that alternative solutions and locations have not been fully considered is incorrect.</p> <p>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] documents the main alternatives considered by National Grid in the development of the</p>	<p>Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
claims asserted that there is insufficient evidence for choosing this location (in Kent).	<p>Sea Link Project and provides an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The chapter is supported by:</p> <ul style="list-style-type: none">• Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368];• Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]• Application Document 7.2 Strategic Options Back Check Report [APP-320];• Application Document 7.3 Design Development Report [APP-321] <p>In developing the Proposed Project, National Grid 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.</p> <p>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. National and international designated sites for nature conservation were unavoidable at all of these landfall areas of search.</p> <p>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 not progressed due to significant technical and environmental constraints on the marine approaches, and the landfall close to Broadstairs was not progressed due to significant constraints on the onward terrestrial route corridor.</p> <p>Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368] 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. As illustrated on Plate 8-1 of Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368] three landfall areas within the wider Pegwell Bay area of search were appraised concluding that for the reasons set out within that document, the northern most of these is preferred.</p> <p>As outlined in the Applicant’s response to comments about the need case, 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]</p> <p>A further summary of the needs case is set out in response to Action Point 1 in 9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].</p>	<p>Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]</p> <p>Application Document 7.2 Strategic Options Back Check Report [APP-320]</p> <p>Application Document 7.3 Design Development Report [APP-321]</p> <p>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]</p>
Alternative options – specific sites		
A number of speakers proposed specific alternative connection points including the Isle of Grain, Kingsnorth, Tilbury and Dungeness. Some comments suggested that the process has not been transparent and should be undertaken by an independent body.	In the development of the Proposed Project, the Applicant has undertaken three rounds of consultation over a period of approximately 2.5 years. At each stage of consultation, the material published was based on the information available at that time and was of sufficient detail to enable local residents and other stakeholders to provide informed feedback on the emerging scheme proposals. The Applicant had regard to all such feedback as part of the continuing development of the Proposed Project up to the time of submitting the DCO application. All views expressed in response to	<p>Application Document 7.2 Strategic Options Back Check Report [APP-320]</p> <p>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
The recently consented Cleve Hill Solar Park was suggested as an alternative location for the converter station.	<p>consultation have been considered and taken into account as set out within Application Document 5.1 Consultation Report [APP-301].</p> <p>The specific requirements of the network reinforcement that Sea Link is providing has informed the parameters of reasonable alternatives, along with a strong and urgent need for the delivery of the Sea Link reinforcement project. The need case is set out in detail in Application Document 7.2 Strategic Options Back Check Report [APP-320] and a further summary of the needs case is set out in response to Action Point 1 in 9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].</p> <p>The fundamental reason for locating onshore infrastructure for the Proposed Project in this area is that at times of low wind and high interconnector imports, Sea Link will provide an additional route for power to flow out of Kent. Sea Link must connect no further west than Canterbury North Substation because its role is to provide another way for power to flow out of Kent in a scenario where there is a fault between Canterbury and Kemsley.</p> <p>In Suffolk, at times of higher wind it will provide an additional route for power to flow out of East Anglia into the network. Sea Link must connect in the Sizewell area in order to enable power transfer from the Sizewell Generation Group in a scenario where there is a fault between Sizewell and Bramford.</p> <p>The Cleve Hill Solar Park was well advanced in the consenting process before work Sea Link commenced and was granted development consent in 2020, therefore was not a reasonable alternative.</p>	
Alternative options – offshore grid		
Some speakers asserted the view that the potential for an offshore grid should be considered as an alternative option.	<p>The Applicant provided a comprehensive explanation of its stance on the matter of an offshore grid in 9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].</p> <p><i>Wider ‘offshore grid’ considerations</i></p> <p>There is no such thing as a truly offshore grid, bearing in mind that all power generated offshore needs to come onshore to the network at some point. The more power that is pooled offshore, the more cables and onshore infrastructure that are needed to bring that power onshore. For example, in Germany and the Netherlands, TenneT are proposing 14 HVDC projects to bring wind power onshore, each project requires 3 cables to come onshore and a converter station onshore. So, the TenneT offshore grid brings a minimum of 21 cables ashore and 14 onshore converter stations. Additionally, wider onshore network reinforcements projects are also being proposed in both countries.</p> <p>There are also technical challenges associated with offshore direct current (DC) technology that influence the extent to which connecting multiple generators into DC networks is feasible. For example, there are no commercially available circuit breakers for a DC network, meaning that the amount of generation that can be connected to a DC network is limited to below the amount that would cause network issues if it was lost at once (currently 1800MW).</p> <p>Regardless of the technical constraints, there are also significant environmental, shipping, and other constraints in the offshore environment which need to be considered when considering whether additional offshore infrastructure may be beneficial.</p> <p>These constraints are reflected in the Holistic Network Design (HND) exercise undertaken by the National Energy System Operator (NESO) in 2022, which already reflects a coordinated transmission network design.</p>	9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p><i>Offshore Coordination Support Scheme (OCSS)</i></p> <p>An offshore interaction between Sea Link and the proposed North Falls and Five Estuaries windfarms was explored through the Offshore Coordination Support Scheme (OCSS) process between 2022 and 2024.</p> <p>This comprised a review of the feasibility of connecting the North Falls and Five Estuaries offshore windfarms with Sea Link in the offshore environment, rather than into an onshore connection point.</p> <p>The outcome was that if this coordination went ahead, it would undermine the ability of Sea Link to meet the needs case and additional reinforcement projects would be needed to secure the system against faults. Therefore, this would have resulted in more onshore infrastructure than is proposed for Sea Link in East Suffolk and in either Essex or Kent, not less.</p>	
Bat and bird mortality		
Concerns were raised regarding potential impacts on birds and bats	<p>There is no evidence that overhead lines pose a significant collision risk for bats, and this issue has not been raised by Natural England or the local planning authorities.</p> <p>The assessment provided in Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity and Application Document 6.6 Habitats Regulations Assessment Report, both updated at Deadline 1, includes assessment of impacts on all bird species, including large birds flying through the area of the proposed overhead lines.</p> <p>The Applicant has commissioned various surveys looking at the potential impacts of the overhead lines on several bird species. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey [APP-152] and the surveys are reported in Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report [APP-153]. This shows that for the majority of species the risk of collisions is fewer than one individual annually. 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 (D) Part 3 Kent Chapter 3 Ecology and Biodiversity, updated at Deadline 1.</p> <p>It is acknowledged that collisions with the existing OHL network do appear to occur for a limited number of species, e.g., Mute Swan. 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 (B55) is secured through Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. It is considered that in the context of the Proposed Project and species involved, that hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions.</p> <p>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] concludes that collision with the proposed overhead line will result in a negligible effect which is not significant.</p> <p>Note that the event in 2003 (where a high number of swans were killed after colliding with overhead lines) was 22 years ago in a different location and cannot be taken to represent a trend or a common occurrence.</p>	<p>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]</p> <p>Application Document 6.6 Habitats Regulations Assessment Report [APP-]</p> <p>Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey [APP-152]</p> <p>Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report [APP-153]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</p>
Bird species		
Speakers raised concerns around the potential impacts on the 230 bird species recorded in this area,	The Applicant recognises the importance of this area for a wide variety of bird species. Land that is outside of designated sites may be functionally linked and is a matter that has been discussed at	Application Document 7.5.3.2 CEMP Appendix B Register of Environmental

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
including Turtle doves, honey buzzards, barn owls, nightingales, skylarks, waterfowl, yellow hammers, golden plovers, marsh harriers.	<p>length with Natural England, resulting in mitigation measures being incorporated into the application, including the delivery of 10ha of off-site arable enhancement primarily for golden plover in the Thanet Coast and Sandwich Bay SPA/Ramsar (commitment B54 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] . This habitat enhancement would mean that the residual effects on the SPA would be negligible and would also lead to a moderate beneficial impact in the long-term on a receptor of up to District (for nesting birds) and Regional (for non-breeding birds) due to habitat creation.</p> <p>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] concludes no significant ornithology effects and 6.6 (C) Habitats Regulations Assessment Report [REP1-071] indicates no adverse effect on the integrity of Thanet Coast & Sandwich Bay SPA/Ramsar.</p>	<p>Actions and Commitments (REAC) [REP1-102]</p> <p>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</p> <p>6.6 (C) Habitats Regulations Assessment Report [REP1-071]</p>
Bird surveys		
One speaker queried why Sandwich Bay Bird Observatory was not contacted for intertidal surveys, as it's part of their recording area and they have extensive records?	While Sandwich Bay Bird Observatory were not directly contacted for data, their published reports were used for reference in the assessment as referenced in the bird survey reports, such as ‘Sandwich Bay Bird Observatory Trust (SBBOT, 2020). Wading Bird Monitoring of the Thanet Coast SPA in Jan/Feb 2020’, along with data from other sources such as Kent Ornithological Society.	No documents referenced
Bird-specific mitigation		
It was asserted that the proposed bird-specific mitigation measures are not adequate.	<p>Regarding the area proposed to offset loss of functionally linked land for golden plover, this area has been discussed and agreed with Natural England, who have not raised concerns on this matter in their Relevant Representation. Ecological suitability was a key factor in discussions with Natural England. Noise disturbance is not considered a significant concern; there are numerous examples of significant bird populations recorded roosting near to roads provided the habitat is sufficiently close to their low tide locations, and is sufficiently appealing as habitat, such as the A27 in Hampshire.</p> <p>Discovery Park is approximately 70 metres from the mitigation fields at their closest and is well screened by dense tree growth either side of the A256 (such that the fields are dark at night away from the immediate vicinity of the A256).</p> <p>The mitigation site has been visited at night and the majority is unaffected by lighting. There are dense tree belts screening the fields from the business park. Moreover, the large size of the parcel (10 hectares) compared to the area of land actually needed for mitigation (3.8 hectares to 7.2 hectares depending on whether you simply use the peak number recorded or the average peak across the entire survey period) enables considerable room to buffer proximity to the business park and dual carriageway to the east and River Stour Canal to the west. Given the close proximity of the Proposed Project to the River Stour estuary to the east, where golden plovers are known to congregate, and the fact that wintering bird surveys have identified golden plover in the area around the mitigation land, it has a good prospect of being used by golden plovers when the habitat is enhanced as planned.</p>	<p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</p>
Climate-related impacts		
Acknowledging the role of the Proposed Project in the pursuit of Net Zero, concerns were raised about embodied carbon, emissions generated during the construction process and potential loss of marshland and the carbon sequestration function it performs.	<p>The Proposed Project is inherently oriented towards supporting the electricity transmission network transition to a more sustainable and decarbonised energy future. Concerns regarding the carbon footprint of the Proposed Project have been robustly considered during the development phases and further detail is provided throughout the application. Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085] presents an assessment of the likely significant effects of the Proposed Project on the climate and climate change effects that affect the Proposed Project and surrounding environment.</p> <p>The potential Greenhouse Gas (GHG) emissions of the Proposed Project are estimated to contribute less than 0.01% of any respective UK carbon budget. Although the Proposed Project will result in</p>	<p>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]</p>

Topic/Themes raised by speakers	Applicant's Response	Relevant DCO Application documents
	<p>increased GHG emissions, when considering the significance of the effect of the Proposed Project on the climate, consideration needs to be given on its role in wider UK policy to decarbonise the electricity grid. Over its lifetime the Proposed Project will be a key scheme for the UK to fulfil its net zero policy and transition away from fossil fuels. By reinforcing the electricity transmission network, the Proposed Project will facilitate the connection of new renewable and low carbon energy generation and interconnectors.</p> <p>In accordance with the IEMA guidance the effect of GHG emissions associated with the Proposed Project is deemed to be not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards for projects of this type. A project with 'not significant' effects is fully in line with measures necessary to achieve the UK's trajectory towards net zero. The Proposed Project is part of UK policy to decarbonise the electricity grid and transition to net zero by 2050.</p>	
Community benefits		
Speakers made suggestions for delivering community benefits in the local area, including some suggestions for local projects	The Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this.	No documents referenced
Community impacts		
Concerned homeowners made points about potential adverse impacts of new infrastructure upon specific properties and local property values more widely.	These concerns are acknowledged by the Applicant. All affected landowners will be compensated on a fair and reasonable basis for any rights acquired, and any impacts on retained property will be considered in line with the Compulsory Purchase Compensation Code. Compensation claims for other disturbance are considered on a case-by-case basis if there is evidence of negative impacts as a result of the Proposed Project.	No documents referenced
A number of speakers raised concerns about the proposed working hours and the impacts of noise and dust on local residents' health and wellbeing	<p>The Applicant recognises that the proposed working hours are a concern for local communities but would seek to emphasise that the working hours are intended to provide flexibility to carry out works when and where needed.</p> <p>The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted.</p> <p>The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].</p> <p>The construction noise level threshold for potential significant effects is lower during weekend and bank holiday daytime periods, compared to weekday and Saturday morning working periods. As such, the threshold is more likely to be exceeded during such periods, assuming the same intensity of</p>	<p>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</p> <p>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</p> <p>Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration [AS-111]</p> <p>Application Document 6.4.3.9 ES Figures Kent Noise and Vibration [AS-141]</p> <p>Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087]</p>

Topic/Themes raised by speakers	Applicant's Response	Relevant DCO Application documents
	<p>works. However, exceedance of the weekend/bank holiday threshold would only be expected for certain construction activities at certain locations at a small number of noise sensitive receptors (NSR), identified as the construction noise and vibration 'hot-spots' in Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration [AS-111] and Application Document 6.4.3.9 ES Figures Kent Noise and Vibration [AS-141]. Should weekend or bank holiday working be required at these locations, and where construction noise levels cannot be attenuated to below the threshold with the use of best practicable means (BPM), there is potential for significant adverse effects depending on the duration of exceedance. In such cases temporal restrictions would be put in place, as part of the application of BPM, to ensure that significant adverse effects are avoided, and adverse effects are minimised.</p> <p>Notwithstanding this, it is not anticipated that all types of construction activity will take place on every Sunday or Bank Holiday. There will be restrictions on the type of activity that can occur on these days. The restrictions include limiting HGV and percussive piling activities. Details relating to the proposed construction working hours and any associated restrictions are secured by Requirement 7 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087] and further set out in Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project [AS-018].</p> <p>It should be noted that the inclusion of Sundays and bank holidays within the core working hours were in fact consulted on during the pre-application stages, specifically in the project-wide July 2024 consultation. Additional Preliminary Environmental Information that considered the effects of these working hours was published as part of this consultation exercise.</p> <p>Also of note is that the principle of working on Sundays and bank holidays has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p>	Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project [AS-018] .
Two speakers from the same household raised concerns regarding their property being on a singletrack road to be used by construction traffic and specifically the logistical arrangements for the daily number of vehicles movements and the associated noise.	<p>The Applicant will continue to engage with affected landowners on an ongoing basis. Having identified the Interested Party who raised this comment, the Applicant confirms that rights of access are being sought along the access road, but that no land rights are being sought from the property owners.</p> <p>Construction traffic is only forecast to use this (Marsh Farm Road) route for a period of six weeks, with a maximum of 29 daily vehicles including seven HGVs. This represents 0.3% of total construction vehicle trips associated with the Kent Onshore Scheme.</p>	No documents referenced
Compulsory Acquisition		
Concerns were raised that affected landowners and residents had not been notified, omitted from documents, or that they had contacted National Grid Electricity Transmission but had received no response or had not had enough information about how they would be affected.	<p>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</p> <p>Application Document 5.1.8 Appendix G Land Referencing Methodology [App 315] sets out how National Grid and the appointed Land Referencer (TerraQuest) identifies and categorises these persons with interests in land inside and outside of the Scheme.</p> <p>The Applicant must consult with and notify the acceptance of the DCO Application to everyone who has a legal interest in, or right to occupy, the land it proposes to acquire, and it can confirm that this has been done in accordance with the Land Referencing Methodology. This includes owners (both freeholders and leaseholders), tenants and occupiers as well as some beneficiaries of legal rights. Persons identified as Category 3 Persons with an Interest in Land have also been consulted and notified in accordance with the Land Referencing Methodology. These persons have been included in</p>	<p>Consultation Report [APP-301]</p> <p>Application Document 5.1.8 Appendix G Land Referencing Methodology [App 315]</p> <p>Book of Reference [REP1-046]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	the Book of Reference [REP1-046] submitted with the Application. Interested parties to whom these criteria do not apply will have been notified by methods prescribed for the Primary and Secondary Consultation Zones outlined in the Consultation Report [APP-301] .	
Concerns about converter station location		
A large number of speakers stated the opinion that Minster Marshes is the wrong location for the converter station, making reference to the importance of Minster Marshes as marshland habitat, citing its ecological importance and the role that marshland can play in carbon sequestration.	<p>It is recognised that the site of the proposed converter station and substation lies within an area known as the Minster Marshes. This reflects the history of this area, which included the silting up of the Wantsum Channel during the medieval and post-medieval period before the land was reclaimed.</p> <p>It is important to note, however, that despite the name and history of this area, the site of the proposed converter station is not undisturbed nor is it a coastal or floodplain grazing marsh. True floodplain grazing marsh consists of grassland which is, as the name suggests, used for grazing livestock though the sward is sometimes cut for hay or silage in the summer.</p> <p>Instead, the proposed converter station and substation site is primarily located within drained and cultivable arable land that is in active use.</p>	No documents referenced
Construction traffic impacts		
Speakers raised concerns about the impacts and duration of construction traffic resulting in delays that would affect local businesses and the day-to-day activities of local residents. Associated views were raised regarding construction traffic exacerbating existing road safety concerns and adversely impacting cyclists and local safe-cycling routes (including dust).	<p>Construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]. Construction phase transport effects (including with respect to Driver Delay) are assessed within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. This demonstrates that the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay), with the identified mitigation in place (to be secured by the aforementioned management plans).</p> <p>National/regional walking and cycling routes will be managed where required to ensure that these routes remain safe, secure and attractive for pedestrians and cyclists to avoid any conflicts. Further details are set out in Application Document 7.5.9.2 Outline PROWMP – Kent.</p> <p>The impacts of potential visual, noise and air quality/dust pollution from the construction phase have been assessed as part of the EIA and are reported within the ES within each of the relevant technical chapters:</p> <ul style="list-style-type: none">• Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061];• Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]; and• Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [APP-069] superseded by [AS-111]. <p>Measures to control pollution from the construction works are set out in Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].</p>	<p>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</p> <p>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].</p>
Cliffsend and Minster Parish Council raised concerns about construction traffic impacts upon communities. Specific locations included local roundabouts, Richborough Link Road, and Jute’s Lane. There was also opposition to construction traffic using Minster roundabout and speakers made points indicating that	<p>The Applicant is mindful of these concerns from the local community. Construction vehicle routing has therefore been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338].</p> <p>The Applicant has undertaken a complete and full assessment of traffic routes for construction. Details are contained in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-</p>	Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338].

Topic/Themes raised by speakers	Applicant's Response	Relevant DCO Application documents
roads in historic villages will not cope with high numbers of HGV movements.	<p>067]. The assessment 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 impacts on the surrounding highway network, including routes through Minster and Cliffsend.</p> <p>As shown on Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181], no construction vehicles are expected to travel through Minster during the peak construction phase. As shown on the HGV Routing Plan within Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266], the route through Minster does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts through Minster. It is similarly the case for Cliffsend where minor (not significant) effects are reported, largely due to the short duration of the impact.</p> <p>Construction phase transport effects (including with respect to Driver Delay) are assessed within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. This demonstrates that the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay), with the identified mitigation in place (to be secured by the aforementioned management plans).</p>	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067].</p> <p>Application Document 7.5.9.2 Outline PRowMP – Kent.</p> <p>Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]</p> <p>Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266],</p>
A number of speakers made points about existing road safety	<p>The Applicant acknowledges these comments and concerns related to the safety of the A256. The Applicant has, however, conducted additional consultation with Kent County Council (as the Local Highway Authority) and has carried out a Stage 1 Road Safety Audit (RSA). A Designer's Response to the RSA Stage 1 has been produced outlining the changes made in response to comments received.</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] provides an assessment of Road Safety in relation to the Proposed Project based on the road link receptors and road junction receptors. This assessment identifies the likely effect of the Proposed Project on Road Safety for all receptors within the study area as being not significant based on the sensitivity levels and small/negligible magnitudes of impact identified for these receptors.</p>	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p>
Consultation and notification		
General publicity and a resulting lack of awareness of the Proposed Project was criticised and the consultation process described as opaque, intimidating and deterring public participation. It was also claimed that not all affected landowners were directly consulted. Several concerns were raised about the complexity of the information provided, lack of detail, and the extent of publicity about the project, including placement of notices.	<p>The Applicant has widely engaged with interested parties regarding the Proposed Project. While the detailed and technical nature of the material produced is acknowledged, non-technical summaries have been produced where possible throughout the pre-application consultation stages.</p> <p>Throughout the development of the Proposed Project, the Applicant has undertaken three rounds of consultation over a period of approximately 2.5 years. Local residents have had opportunities to provide feedback either during these specific periods, or by emailing or calling outside of the consultation periods.</p> <p>Consultation, including activities such as the placement of notices, was undertaken in accordance with the Statement of Community Consultation which itself was subject to extensive consultation with the host Local Planning Authorities and prepared in accordance with all applicable statutory requirements pursuant to the Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017 as well as other relevant guidance.</p> <p>The material published for Statutory consultation was based on the information available at that time and was of sufficient detail to enable informed feedback to be provided on the emerging scheme proposals. The Applicant had regard to all such feedback as part of the continuing development of the Proposed Project up to the time of submitting the DCO application. All views expressed in response to consultation have been considered and taken into account as set out within Application Document 5.1 Consultation Report [APP-301].</p>	<p>Application Document 5.1 Consultation Report [APP-301]</p> <p>Application Document 5.1.8 Appendix G Land Referencing Methodology [APP-315]</p> <p>Application Document 5.1.6 Appendix E Statutory Consultation [APP-309 to APP-312]</p> <p>Application Document 4.3 (C) Book of Reference [REP1-046]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>Similarly, in accordance with the requirements of the Planning Act 2008 and in accordance with the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009, the Applicant has made diligent inquiries to identify Persons with an Interest in Land, in order to notify them of consultation on the Proposed Project. This comprised initial desktop referencing using information obtained from the Land Registry and other online resources (such as Experian, Royal Mail address verification and Companies House checks). The land referencing methodology is provided in Application Document 5.1.8 Appendix G Land Referencing Methodology [APP-315]. Following this initial desktop exercise, the Applicant issued letters and forms by post (First Class) requesting further information (see Section 5 of Application Document 5.1.6 Appendix E Statutory Consultation [APP-309 to APP-312]).</p> <p>The Notices issued to affected parties outlined where hard copies of Application Documents could be viewed and provided details of how to request copies. All landowners are included in the Application Document 4.3 (C) Book of Reference [REP1-046]. The Applicant will continue to engage with affected landowners on an ongoing basis.</p>	
Cost of development	<p>Speakers raised concerns that no data on the cost of developing alternative sites has been presented, advocating that this information should be made available and not be the main factor in decision making.</p> <p>The site selection for the converter station and substation was undertaken in accordance with the National Grid’s approach to project development, as set out in Application document 7.3 Design Development Report [App-321]. This involves a balanced consideration of various environmental, socio-economic, engineering, and cost factors, which (alongside consultation, ongoing survey work, and back checking) inform reasoned judgements as to what the most appropriate project design to take forward.</p> <p>When considering the costs implications for different options, the Applicant takes account of the assumption that the final costs for any option, once detailed design and mitigation is taken into account, will exceed any high-level assumptions that informed initial options appraisal. This means that when considering the higher cost implications of a more detailed design, it is assumed that alternative designs could present proportionate cost increases should they be designed to the same level of detail. This principle is explained in Application document 7.2 Strategic Options Back Check Report [App-320] in the context of strategic options, but it is applied at options selection stages of the options appraisal process too.</p> <p>Notwithstanding this, the construction of the converter station site at Richborough was assumed from an early stage to require civils and earthworks, and to require piled foundations through the Thanet formation and into the chalk bedrock up to 30m below (as presented in Volume 1 Part 1 Chapter 4 Description of the Proposed Project and Volume 1 Part 3 Chapter 6 Geology and Hydrogeology of the Preliminary Environmental Information Report consulted on at the Statutory Consultation stage in 2023). However, in the interest of transparency and robust consultation, and recognising the potential implications on overall building heights, the Applicant presented the emerging detail of the likely foundation design during the targeted consultation in 2024, as set out in Application Document 5.1.7 Appendix F Targeted Consultation Part 1 of 2 [App-313]. However, this was a design progression from the previous assumptions, rather than a new requirement.</p> <p>As set out above, the process of back check involves considering evolving and better understood designs against the potential implications of alternative options that are not designed or assessed to the same level. Regarding costs specifically, a converter station site elsewhere (for example in Option Area B) would have required a longer DC cable route from the landfall and a longer AC cable connection into the existing network. These would have additional cost and engineering implications. If the AC connection was a buried cable, there would be a requirement for a cable sealing end compound, infrastructure not currently required at all, with further engineering and cost implications.</p>	<p>Application document 7.3 Design Development Report [App-321]</p> <p>Application document 7.2 Strategic Options Back Check Report [App-320]</p> <p>Application Document 5.1.7 Appendix F Targeted Consultation Part 1 of 2 [App-313]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>Furthermore, a converter station in any location would require a detailed foundation and civils design with associated costs.</p> <p>The potential cost implications of the emerging foundation design were considered, along with other factors including potential environmental effects, as part of the ongoing process of balanced back check and review. The conclusion of this review was that the proposed converter station and substation site remained the most appropriate.</p>	
Cultural heritage and historic significance		
Speakers were concerned about the impact on heritage assets, including archaeology and Viking and Roman history of the area.	<p>The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce cultural heritage impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as the sensitive routing and siting of infrastructure and temporary works. Potential impacts resulting from the Kent Onshore Scheme are detailed within Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]. This covers all receptors that have the potential to suffer significant environmental effects as a result of physical impacts during construction, or as a result of permanent impacts on the setting of assets during the Operational phase. This includes the multi-period Ebbsfleet Lane Complex which include remains dating to the Roman period, as well as assets in the terrestrial zone of the Pegwell Bay area. The exact location of the landings by Julius Caesar and St Augustine are not known/documented, therefore potential impacts on these cannot be assessed.</p> <p>As stated within the ES chapter, residual effects of the Proposed Project on cultural heritage receptors following the implementation, where necessary, of additional mitigation measures are assessed to be not significant.</p>	<p>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]</p>
Concerns were raised about the landscape, visual and historic impact on Pegwell Bay, as well as the amenity for residents overlooking the bay	<p>The key characteristics of the Pegwell Bay landscape are noted including the long panoramic views seaward and perceptual qualities relating to tranquillity and remoteness, as noted within Application Document 6.3.3.1.B ES Appendix 3.1.B Landscape Baseline [APP-144]. The assessment of effects arising from the Kent Onshore Scheme on landscape character is summarised within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and detailed within Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]. This includes reference to the potential effects of the landfall on the relevant published Landscape Character Area.</p> <p>Table 3.1 in Appendix 3.1C assesses the effects on Thanet District Landscape Character Area F1 Pegwell Bay during construction and concludes that there would be direct effects on the Landscape Character Area associated with the cable laying barge and other vessels temporarily within Pegwell Bay and out at sea. There would also be direct effects associated with construction access within the northern part of the Landscape Character Area, including along the former hoverport site. These effects would have a negligible significance of effect during construction and were scoped out of the operational assessment as the only direct effect on the Landscape Character Area would be a very short section of monitoring access with occasional use.</p> <p>The assessment of effects arising from the Kent Onshore Scheme on visual amenity is summarised within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and detailed within Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]. This has included a range of receptors, including local residents and visitors as well as views experienced from recreational routes along the coast.</p> <p>From a visual amenity perspective, Viewpoint 2 is representative of recreational users of Pegwell Bay Country Park and the visual receptor is recognised as being of a ‘very high’ sensitivity. The Proposed Project is predicted to have a ‘small’ magnitude of effect and a ‘minor’ adverse effect, which is not significant at construction and this would reduce to ‘negligible adverse’, also not significant, at</p>	<p>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</p> <p>Application Document 6.3.3.1.B ES Appendix 3.1.B Landscape Baseline [APP-144]</p> <p>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]</p> <p>Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]</p> <p>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>operation and maintenance. A trenchless construction method would be used to install cables beneath the surface around the landfall point at Pegwell Bay, therefore minimising disturbance to the natural environment at this point and reducing effects.</p> <p>Viewpoint 13 is representative of residential receptors where views contribute to the landscape setting enjoyed by residents on the southwestern settlement edge of Ramsgate. The visual receptor is recognised as being of a ‘high’ sensitivity. The Proposed Project is predicted to have a ‘small’ magnitude of effect and a ‘minor’ adverse effect, which is not significant at construction and operation and maintenance.</p> <p>Potential impacts resulting from the Kent Onshore Scheme on cultural heritage are detailed within Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]. This covers all receptors that have the potential to suffer significant environmental effects as a result of physical impacts during construction, or as a result of permanent impacts on the setting of assets during the Operational phase. This includes the multi-period Ebbsfleet Lane Complex which include remains dating to the Roman period, as well as assets in the terrestrial zone of the Pegwell Bay area. As stated within the chapter, residual effects of the Proposed Project on cultural heritage receptors in Kent, following the implementation, where necessary, of additional mitigation measures, are assessed to be not significant.</p>	
Cumulative impacts		
Concerns have been raised around potential cumulative effects with other projects in Thanet, including energy and housing development and the development of Manston Airport. Comments included criticism of the extent of the cumulative impact study area.	<p>The effects of the Proposed Project with other developments located in Thanet are assessed in Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. This assessment has been undertaken in accordance with Planning Inspectorate Guidance: Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment.</p> <p>Five hundred metres is the study area used for the assessment reported in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070] where there are potential effects on a residential property, businesses, open spaces, development land and PRoW and recreational routes.</p> <p>If a property, business, or open space is within 500m of the Proposed Project is also within 500m of one of the other projects then consideration is given to the potential for cumulative effects between the two projects.</p> <p>The reason for this is that many of the impacts that could affect these receptors do not typically extend beyond this distance for example dust (250m), generator emissions (200m), vehicle emissions (200m) and construction and traffic noise and vibration (300m)</p>	<p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</p> <p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]</p>
With regard to other developments occurring in the Thanet area, points were raised highlighting that Thanet has lower per capita green space than other areas and it is now being eroded by vast new housing developments built on greenfield sites. The impact of the proposed development would be huge for local residents who face losing a precious resource for their well-being and quality of life.	<p>The impact of the Proposed Project on open space has been assessed in the Planning Statement (Application Document 7.1 Planning Statement [AS-057]) from a planning perspective. National Grid has reviewed all the land within, or adjacent to, the Kent Onshore Scheme Order Limits, to determine whether it is open space as defined in Footnote 246 of NPS EN-1 (i.e. “<i>all open space of public value, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as visual amenity</i>”). There are four areas of open space with the Kent Onshore Scheme Order Limits which fall within the definition of open space under Footnote 246, as detailed in Table 7.2 of Application Document 7.1 Planning Statement [AS-057]. Whilst there might be some short-term disturbance during construction, this will be temporary and there will be no loss and no increased demands or impacts on open space as a result of the operation of the Proposed Project.</p> <p>A complete health and wellbeing assessment of the Proposed Project has been undertaken and is set out in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].</p>	<p>Application Document 7.1 Planning Statement [AS-057]</p> <p>Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]</p> <p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>This concludes that there are no anticipated significant effects as a result of the Proposed Project. Specifically, the Applicant recognises the importance of local amenity and access to open space. In response to this concern, Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] assesses the likely significant effects on amenity of residents, businesses, development sites, PRoW users, and users of open spaces, and community facilities within 500 m of the Order Limits. The cumulative impact is also assessed in Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. No significant adverse effects are identified with regards to human health and wellbeing.</p>	
DCO application		
Some speakers made assertions that the application was not ready for submission and not robust due to the number of changes that have been made already	<p>The timing of the submission of the DCO Application has been actioned in accordance with the national need for network reinforcement and the requirements of the Planning Act 2008. The Proposed Project has been developed in coordination with other infrastructure proposals and is subject to a robust examination process.</p> <p>The DCO Application has already been deemed acceptable by the Planning Inspectorate, in accordance with the requirements of Section 55 of the Planning Act 2008. These requirements include a provision that 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.</p> <p>Changes to applications after submission are not unusual and are often necessary to address new information, stakeholder feedback, or evolving project requirements.</p>	Notification of Decision to Accept Application [PD-001]
There were some concerns raised about the proposed change application, and the consultation process around the changes.	<p>Changes to DCO applications after submission are not unusual. The Applicant has undertaken consultation in relation to the Change Request in accordance with Government Guidance and as set out in its initial change notification letter [CR1a-001]. This approach is also in accordance with the advice received from the Examining Authority in the Rule 9 letter [PD-011]. Details of the proposed changes are included in the Change Request which was submitted on 26 November [CR1-001 to CR1-068].</p>	<p>Rule 9 letter [PD-011]</p> <p>Change notification letter [CR1a-001]</p> <p>Change Request application documents [CR1-001 to CR1-068]</p>
Electromagnetic interference		
The issue of EMF was raised including potential interference with Manston Airport.	<p>In the UK there are exposure limits in place to protect against EMF effects. Those exposure limits have been set independently by an international commission of scientists who carefully review all the research which has investigated EMF and health effects. There have been over four decades of research looking into whether EMFs can cause health effects, and there are no established effects below the exposure limits.</p> <p>The magnetic fields produced by cables are extremely localised. They diminish quickly with distance from the source. Details are contained in Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289].</p> <p>All of the Applicant’s electricity equipment is designed to produce EMFs below the limits set by the Government that are in place to protect us all.</p>	Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]
Ecology		
A significant proportion of speakers identified the importance and significance of Pegwell Bay for nature, raising concerns that the National Nature	<p>The Special Protection Area (SPA), Special Area of Conservation (SAC), the NNR and Site of Special Scientific Interest (SSSI) designations that cover the Pegwell Bay area provide statutory protections</p>	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
Reserve is at risk and advocating that as irreplaceable habitat, more must be done to protect it	<p>for this area. These protections are reinforced through the requirements of planning policy and legislation, with which the Proposed Project and other developments must comply.</p> <p>The application of the mitigation hierarchy is evident in the design of the Proposed Project. Although all potential landfall areas along the Kent coast are subject to various national and international nature conservation designations, Pegwell Bay was identified as the least constrained (technically viable) landfall option, with opportunities to avoid impacting the sensitive saltmarsh habitat using trenchless cable technology.</p> <p>The onward terrestrial cable corridor and the converter station and substation sites avoid designated sites altogether.</p> <p>These aspects of the Proposed Project have been thoroughly assessed in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], Application Document 6.6 Habitats Regulations Assessment Report [REP1-071]. 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 [REP1-102] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035] which are secured in turn via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [REP1-036].</p>	<p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</p> <p>Application Document 6.6 Habitats Regulations Assessment Report [REP1-071]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102]</p> <p>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]</p>
A number of points were raised about the extent and timing of surveys that have been undertaken, claiming that the project risks are unclear as a result of this	<p>An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. A rigorous impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust have taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.</p>	<p>No documents referenced</p>
Speakers were concerned about impacts on mammal species including water vole, brown hare, bats, otter, badger, seals, beaver, amphibians and wild ponies—indicating that a number of species present in this area are re or amber listed.	<p>The Applicant is cognisant of the variety and diversity of flora and fauna present in this area. Accordingly, the likelihood of temporary and permanent impacts arising from the Proposed Development in Kent has been considered in detail in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049], 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 [REP1-071]. 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 [REP1-102] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035] which are secured in turn via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [REP1-036]. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.</p>	<p>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</p> <p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</p> <p>Application Document 6.6 Habitats Regulations Assessment Report [REP1-071]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102]</p> <p>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]</p>
Speakers raised concerns about impacts on European eel.	<p>Impacts on fish, including European eel, are considered in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] and Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish [AS-022]</p>	<p>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	Mitigation for any potentially significant effects is set out in these documents, and in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035] which are secured in turn via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [REP1-036] . With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.	Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish [AS-022] Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102] Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]
Some speakers were concerned about impacts on insects.	Impacts on all terrestrial invertebrates are considered in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] . Mitigation for any potentially significant effects is set out in this document, and in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035] which are secured in turn via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [REP1-036] . With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102] Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]
A large number of speakers raised concerns at the potential loss of habitat associated with the development of the Proposed Project.	<p>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 [REP1-049], 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 [REP1-071].</p> <p>Habitat fragmentation due to temporary losses has been assessed as not significant even allowing for the time taken for restored habitats to develop. The only habitats that are likely to take 10 years or more to establish are woody planting. There is little of this being removed for the Proposed Project (identified in paragraph 2.9.65 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] as a temporary loss of approximately 140 m of species-poor hedgerow (some defunct) and linear roadside woodland and plantation along the A256 and in paragraph 2.9.219 a permanent loss of approximately 650 m (the entirety) of two parallel hedgerows and a 40 m length of the narrow plantation and semi-natural woodland belt either side of the A256).</p> <p>Most of the habitat being temporarily removed can be restored relatively quickly (e.g. in approximately 1-2 growing seasons) such as the grassland classified in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] as grazing marsh, arable farmland and ditch vegetation. This is evidenced by the recovery of these same habitats from the Richborough to Canterbury overhead line construction which completed in 2021. Moreover, connectivity can be preserved during that time through use of mitigation measures committed to in the DCO documentation (notably Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments REAC) [REP1-102]) such as mammal ledges in culverts (B17), controls on lighting and hurdles (B54) or other structures to maintain connectivity for bats through the relatively few hedgerows being affected by the Proposed Project. In the long-term there will be a considerable net increase in the amount of habitat present for most species.</p>	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] Application Document 6.6 Habitats Regulations Assessment Report [REP1-071]
Environmental policy and legislation		
Concerns were raised around impact on the Suffolk Coast and Heaths AONB/National Landscape,	The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB 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	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]

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<p>including its special properties and compliance with Section 85.</p> <p>* Speaker originally scheduled to speak at OFH1 in Suffolk. Although Suffolk-related, points raised are included here to provide a complete record of oral submissions and copied to the corresponding notes for OFH1.</p>	<p>Designation and Landscape Character Assessment [APP-097]. The assessment takes into account the Natural Beauty indicators of the Suffolk Coast and Heaths AONB. The Planning Statement (Application Document 7.1 Planning Statement (Clean) [AS-057]) provided an assessment on the Special Qualities Indicators. The effects for all the Natural Beauty indicators and the Special Qualities indicators are considered to be not significant and on that basis the Suffolk Onshore Scheme (alone) is not therefore likely to detract from the Natural Beauty and Special Qualities of the AONB.</p> <p>The assessment of the inter-project cumulative effects on the Suffolk and Essex Coast and Heaths AONB is presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. The relevant other developments which were considered in the Inter Project cumulative assessment were:</p> <ul style="list-style-type: none">— The Sizewell C main development site;— East Anglia ONE & TWO Offshore Windfarms; and— LionLink Offshore Interconnector. <p>When considering the potential cumulative effects of the Suffolk Onshore Scheme in combination with all the above developments, there is the potential for significant inter-project cumulative effects for a short and temporary period on the AONB due to the potential simultaneous or sequential construction of the projects. The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the AONB has the potential to alter the perception of the AONB with construction of major energy projects becoming a temporary characteristic feature of the landscape. These cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time.</p> <p>Whilst 7.61 ha area of acid grassland would be temporarily affected during construction, this would be temporary and reinstated within a few years. The project is proposing a further 6 ha of acid grassland provided within the Order Limits for delivering enhancement to the AONB located to the south of the A1094. This area would be enhanced and managed as acid grassland prior to the loss of acid grassland east of Leiston Road as per paragraph 5.3.2 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059].</p> <p>Given all of the above, the Applicant considers that the Section 85 duty to seek to further the purposes of the AONB has been complied with.</p> <p>National Grid has submitted Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] at Deadline 1. This technical note provides a single source of reference for material relating to the Section 85 duty within the DCO application documentation.</p>	<p>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]</p> <p>Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]</p>
Flood risk	<p>The proposed location of the Minster converter station and substation is in flood zone 1, which covers areas at the lowest risk of fluvial flooding. Although there is the potential for high groundwater levels, and possibly areas of groundwater flooding, this risk is being managed through creation of a platform upon which the infrastructure would be built. The assessment of flood risk is set out in Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and its supporting document Application Document 6.8 Flood Risk Assessment [APP-292]</p> <p>Surface water drainage from the converter and substations at Minster Marshes, as noted in commitment W11, would be managed and treated using SuDS in accordance with policy and guidance requirements of the relevant Lead Local Flood Authorities (LLFA) to include allowances for</p>	<p>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</p> <p>Application Document 6.8 Flood Risk Assessment [APP-292]</p> <p>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127APP-340]</p>

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	<p>climate change in accordance with current (May 2022) Environment Agency guidelines. The SuDS would be maintained over the lifetime of the Proposed Project and would capture the initial runoff during rainfall events, which can often contain the highest concentrate of silts and other contaminants.</p> <p>These commitments are secured via Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127APP-340] which is in turn secured via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087].</p>	<p>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127APP-340]</p> <p>Application Document 3.1 draft Development Consent Order (DCO) [AS-087]</p>
Concerns were raised water displacement as a result of development and reducing flood storage capacity	<p>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.</p> <p>All hardstanding areas created by the Project (temporary and permanent) will be served by Sustainable Drainage features that will provide for attenuation so that discharge rates to receiving watercourses will not exceed the estimated ‘greenfield’ (pre-development) run-off rates in accordance with Kent County Council guidance and in agreement with the Stour (Kent) Internal Drainage Board, who manage the watercourses that are intended to receive drainage discharges. The design standard of the 1% annual change rainfall event with an allowance for climate change have been applied.</p> <p>Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that accompanies the National Planning Policy Framework compensation for losses of floodplain storage are not required. This has also been previously agreed with the Environment Agency.</p> <p>Assessment of flood risk from all sources is set out in Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and its supporting document Application Document 6.8 Flood Risk Assessment [APP-292]</p>	<p>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and its supporting document Application Document 6.8 Flood Risk Assessment [APP-292]</p>
Ground conditions at Minster Marshes		
Concerns were raised about the challenges and impacts of building on soft ground associated with the alluvial clay found at Minster. These include increased risk of flooding and pollution from groundwater, and the source of fill material. Speakers made a variety of analogies to portray the nature of the ground conditions, citing experience-based and anecdotal examples of the challenges of building in this area, especially after extended periods of wet weather.	<p>The ground conditions at the converter site are well understood, as demonstrated in Application document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065], and the foundation design for the converter station and substation platform will reflect this. It is likely that the design will include a raised development platform, with piled foundations through the Thanet Formation (including alluvium and clay) into the white chalk bedrock beneath.</p> <p>In the Kent Onshore Scheme, the proposed HVDC underground cable route, Minster Converter Station and Substation, all construction compounds and all cable transition joint bays would be situated in Flood Zone 1 and at landfall all construction works and operational infrastructure across the Flood Zone 3 extent would be underground, thereby avoiding any interaction with Flood Zone 3a or 3b.</p>	<p>Application document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]</p>
Some speakers highlighted that there is a likelihood of encountering unexploded ordnance (UXO) when undertaking construction in this area	<p>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 UXO during the works.</p>	<p>No documents referenced</p>
Ground conditions at the Thanet Hoverport		
Concerns were raised around the use of the hoverport for construction access, including pollution concerns from the colliery spoil, the wildlife and habitat that have colonised.	<p>The hoverport will not be used as a core location or compound for works, only an access route to the intertidal areas in line with the original application.</p> <p>At this stage the composition of the ground at the hoverport has not been confirmed. The risk and impact assessments undertaken for the DCO application (see Application Document 6.2.3.5 Part 3</p>	<p>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]</p>

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	<p>Kent Chapter 5 Geology and Hydrogeology [APP-065]) recognise the potential for a level of contamination, and in the context of the proposed use of the Hoverport the conclusion is that significant effects in relation to geology and hydrogeology (from existing contamination) are unlikely, and any potential effect is regarded to be minor and not significant.</p> <p>A Structural Integrity Assessment of the hoverport hard standing will be undertaken to ensure the size of equipment and lorry loads can be deployed safely across the hoverport.</p>	
Health and wellbeing		
Concerns were raised about the impact of the Proposed Project on people’s enjoyment of the hoverport, Pegwell Bay and Minster Marshes from peace and tranquillity and health and wellbeing perspectives. These areas are widely regarded as valuable assets for recreation and reference was made to Green Social Prescribing and a wide range of different user groups deriving benefit.	<p>The Applicant recognises the importance of uninterrupted, reliable access to open space, leisure facilities, and transport connections in supporting community wellbeing. In response to this concern, the Applicant has undertaken a comprehensive and robust assessment of health and wellbeing within Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071], such that any likely significant effects of the Proposed Project have been identified and mitigated. Section 11.9 of Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] 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.</p> <p>Throughout construction of the Proposed Project areas used for recreational purposes will remain largely accessible, with restrictions only being in place for a short period of time.</p> <p>The Proposed Project incorporates measures to control noise and vibration during construction, 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-087].</p> <p>In addition, an indicative assessment of operational noise from the proposed Minster Converter Station, based on current design information, is presented in Application Document 6.3.3.9.D ES Appendix 3.9D Kent Operational Noise Assessment [APP-191]. With standard embedded mitigation measures, the impact of operational noise from the proposed Kent Converter Station on all nearby Noise Sensitive Receptors (including the school), has been assessed as having a negligible magnitude during both daytime and night-time periods. This would result in a negligible effect at all nearby Noise Sensitive Receptors, which is considered to be not significant</p>	<p>Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071].</p> <p>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</p> <p>Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent [APP-351]</p> <p>Application Document 3.1 draft Development Consent Order [AS-087].</p> <p>Application Document 6.3.3.9.D ES Appendix 3.9D Kent Operational Noise Assessment [APP-191].</p>
Impacts on recreation		
Concerns were expressed in relation to the potential for long-term closure of footpaths and the coastal path at Pegwell Bay	<p>The Applicant acknowledges the importance of the King Charles III Coastal Path and confirms that it will remain open throughout the construction of the Proposed Project.</p> <p>The Coastal Path is identified as <i>very high</i> sensitivity in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] due to its national trail designation and regular use, and <i>high</i> sensitivity in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] (Table 7.41). The Way of St Augustine, coinciding with the Viking Trail (NCN 15) where it intersects or runs near the Order Limits in the northern study area, is assessed as the Viking Trail receptor and classified as <i>very high</i> sensitivity in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and <i>medium</i> sensitivity in Chapter 7 (Table 7.41). Both Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] conclude that the routes</p>	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]</p>

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	will remain open and usable throughout construction and operation, with no significant adverse effects on value or user experience.	
Impacts on the local economy	<p>A complete assessment of socio-economics effects has been undertaken. This is set out in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project. These include effects from construction employment and Gross Value Added (GVA) generation, which are considered minor beneficial, and not significant (50 total net jobs and £3.6 million GVA per annum during the construction phase).</p> <p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] identifies business premises and activity within 500 m of the Proposed Project’s Order Limits, including golf clubs, holiday lets, pubs and restaurants. Where there are receptors located beyond 500 m that could still be impacted by the project, these have also been considered in the assessment. The impact of the Kent Onshore Scheme on these business premises is considered within Section 10.9 Assessment of Impacts and Likely Significant Effects. This assessment considers impacts in terms of land take and severance, concluding that there are no anticipated significant effects.</p> <p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] conducts an assessment of tourism assets within 500 m of the Kent Onshore Scheme Order Limits, in terms of any temporary or permanent land take impacts and severance of access. The study area of 500 m was determined based on experience from other schemes and Design Manual for Roads and Bridges (DMRB) LA 112: Population and human health guidance, as this is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. There are no tourist and visitor attractions which would be affected by land take required for the Kent Onshore Scheme or to which access would be required. Additionally, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] concluded there are no significant effects in terms of severance on the roads assessed during construction. Therefore, the socio-economic assessment concluded there would be no severance effects between residents or visitors and tourism assets due to the construction of the Kent Onshore Scheme. No additional impacts have been identified during the operation and maintenance phase. Amenity impacts on private, community, recreation and tourism receptors are assessed in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071]. 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 Kent Onshore Scheme and therefore no additional mitigation will be required.</p>	<p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071]</p>
Land drainage	<p>A number of speakers raised concerns relating to increased flood risk and watercourse pollution as a result of the converter station runoff.</p> <p>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.</p> <p>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.</p> <p>All hardstanding areas created by the Project (temporary and permanent) will be served by Sustainable Drainage features that will provide for attenuation so that discharge rates to receiving watercourses will not exceed the estimated ‘greenfield’ (pre-development) run-off rates in accordance</p>	<p>Application Document 6.8 Flood Risk Assessment [APP- 292]</p> <p>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</p> <p>Application Document 6.9 Water Framework Directive Assessment [APP-293]</p>

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	<p>with Kent County Council guidance and in agreement with the Stour (Kent) Internal Drainage Board, who manage the watercourses that are intended to receive drainage discharges. The design standard of the 1% annual change rainfall event with an allowance for climate change have been applied.</p> <p>The SuDS would be maintained over the lifetime of the Proposed Project and would capture the initial runoff during rainfall events, which can often contain the highest concentrate of silts and other contaminants.</p> <p>The effects of the proposed permanent watercourse crossings have been assessed within Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and its supporting documents: Application Document 6.8 Flood Risk Assessment [APP-292] and Application Document 6.9 Water Framework Directive Assessment [APP-293].</p> <p>The Applicant has engaged with the Environment Agency regarding the proposed crossings of main river watercourses, with key design parameters for the crossings having been agreed. Measures are embedded within the designs of these crossings to mitigate for any potential to increase fluvial flood risk.</p> <p>The DCO secures a commitment to monitor existing flood defences during the cable installation in agreement with Environment Agency protocols, to ensure no detriment to the integrity of the defences. This commitment is contained in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-087].</p>	<p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]</p> <p>Application Document 3.1 draft Development Consent Order [AS-087]</p>
Concerns relating to increased flood risk and watercourse pollution as a result of the converter station runoff.	<p>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.</p> <p>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.</p> <p>All hardstanding areas created by the Project (temporary and permanent) will be served by Sustainable Drainage features that will provide for attenuation so that discharge rates to receiving watercourses will not exceed the estimated ‘greenfield’ (pre-development) run-off rates in accordance with Kent County Council guidance and in agreement with the Stour (Kent) Internal Drainage Board, who manage the watercourses that are intended to receive drainage discharges. The design standard of the 1% annual change rainfall event with an allowance for climate change have been applied.</p> <p>The SuDS would be maintained over the lifetime of the Proposed Project and would capture the initial runoff during rainfall events, which can often contain the highest concentrate of silts and other contaminants.</p> <p>The effects of the proposed permanent watercourse crossings have been assessed within Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and its supporting documents: Application Document 6.8 Flood Risk Assessment [APP-292] and Application Document 6.9 Water Framework Directive Assessment [APP-293].</p> <p>The Proposed Project team has engaged with the Environment Agency regarding the proposed crossings of main river watercourses, with key design parameters for the crossings having been agreed. Measures are embedded within the designs of these crossings to mitigate for any potential to increase fluvial flood risk.</p>	<p>Application Document 6.8 Flood Risk Assessment [APP- 292]</p> <p>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</p> <p>Application Document 6.9 Water Framework Directive Assessment [APP-293]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]</p> <p>Application Document 3.1 draft Development Consent Order [AS-087]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>The DCO secures a commitment to monitor existing flood defences during the cable installation in agreement with Environment Agency protocols, to ensure no detriment to the integrity of the defences. This commitment is contained in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-087].</p>	
Landscape and visual impacts	<p>The effects arising from the Kent Onshore Scheme on landscape character is summarised within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061], the landscape assessment is detailed within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-145] and the visual assessment is detailed within Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]. This includes reference to the potential effects of the Minster Converter Station and Substation on the published Landscape Character Areas and representative viewpoints.</p> <p>NPS EN-1 paragraph 5.10.5 recognises that ‘<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape</i>’. Given the size and nature of the Minster Converter Station and Substation, there are predicted significant adverse landscape effects in the area where the Minster Converter Station is located. However, the effects have been minimised through the optioneering process and proposed landscape mitigation.</p> <p>The inter-project cumulative effects chapter are explained in Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. It is acknowledged that there is the potential for significant residual adverse effects when considering total cumulative effects on the eastern periphery of Landscape Character Area (LCA) E1 in relation to Richborough Energy Park developments (ID79, ID356, ID512) and the Land Adjacent to Southern Water’s Waste Water Treatment Site (ID141).</p> <p>Opportunities for coordination between proposed projects has been explored across the whole of the Proposed Project. The siting of the Minster Converter and Substation has sought to reduce the potential spread of infrastructure and to concentrate development in a single area, through siting close to the Richborough Energy Park. However, opportunities for coordination in Kent are limited. Further information is set out in Application Document 7.10 Coordination Document [APP-363].</p>	<p>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</p> <p>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-145]</p> <p>Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]</p> <p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</p> <p>Application Document 7.10 Coordination Document [APP-363].</p>
One speaker raised concern about compliance with Thanet District Council’s local landscape planning policy.	<p>Following a direction from the Secretary of State under Section 35(1) of the Planning Act 2008, Sea Link (the ‘Proposed Project’) is to be treated as development of national significance for which development consent is required. As such, Section 104 of the Planning Act 2008 provides that the Secretary of State must decide such applications in accordance with the relevant National Planning Policy Statements (NPS), which are: Overarching National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Policy Statement for Electricity Networks Infrastructure (NPS EN-5). Therefore, Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires proposals to be decided in accordance with the Development Plan, does not apply to the Proposed Project.</p> <p>Paragraph 4.1.15 states that, “<i>in the event of a conflict between [a local development plan] and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure</i>”. In any event, local planning policy is considered in Application Document 7.1 (C) Planning Statement [AS-057].</p>	<p>Application Document 7.1 (C) Planning Statement [AS-057]</p>
Loss of trees		

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
Concerns were raised about the potential loss of matures trees in the area or unnecessary pruning.	<p>Works to trees will only be undertaken where it is necessary.</p> <p>In total, three individual trees, part of one hedgerow and part of one woodland of moderate quality (Category B); and five individual trees, 10 tree groups, six-part tree groups, one hedgerow and one part hedgerow of low quality (Category C) are likely to be removed to facilitate the Proposed Project (in Kent). These are detailed in Application 6.10 Arboricultural Impact Assessment [APP-294] and [APP-295].</p> <p>All of the trees to be removed are within the Order Limits. No trees of high quality (Category A) are to be removed to facilitate the Proposed Project. No veteran or ancient trees are to be removed, and this commitment will be secured via the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. No trees subject to TPO are to be removed (based on TPO information available at the time of writing).</p> <p>Tree loss is assessed as a reasonable worst case (excluding the retention of all veteran and ancient trees and those which are specifically identified to be retained) to allow flexibility in the final alignment of the Proposed Project within the Order Limits. 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.</p> <p>No need for pruning has been identified at this stage; however, there is likely to be a requirement for clearance pruning to facilitate construction access along proposed access routes in the future. Due to the existing use any pruning requirements are likely to be minor. The final extent of pruning will be the minimum feasible and will be agreed on site with the Project Arboriculturist prior to the commencement of site works.</p> <p>Pruning works are also likely to be required to ensure that a 5.3 m clearance is maintained from the proposed OHL to any part of a retained tree. At this stage no pruning has been identified, however at the detailed design stage when the final alignment of the OHL is determined the final specification for tree pruning will be detailed within the Arboricultural Method Statement which will be secured via DCO Schedule 3 Requirement 8 (Application Document 3.1 draft Development Consent Order [AS-087]).).</p>	<p>Application 6.10 Arboricultural Impact Assessment [APP-294] and [APP-295].</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].</p> <p>Application Document 3.1 draft Development Consent Order [AS-087].</p>
Migrating birds		
Speakers drew attention to this area being part of the East Atlantic Flyway route of bird migration and the potential impacts of the Proposed Project upon bird habitats	The Applicant recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Impacts on bird passage along the River Stour corridor between Pegwell Bay and Minster Marshes (as well as Stodmarsh) have been considered in Application Document 6.2.3.2 (D) Part 3 Kent Chapter 3 Ecology and Biodiversity, Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Ornithology and Application Document 6.6 (C) Habitats Regulations Assessment Report , all updated at Deadline 1. These documents assess the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway, concluding that with mitigation there will be no likely significant effects.	<p>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 3 Ecology and Biodiversity</p> <p>Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Ornithology</p> <p>Application Document 6.6 (C) Habitats Regulations Assessment Report.</p>
Mitigation proposals		

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
Some speakers asserted that the proposed mitigation measures are inadequate to compensate the loss that will occur, with some reference to use of Biodiversity Net Gain (BNG).	<p>Mitigation measures have been identified and incorporated into the Proposed Project where appropriate and necessary, as detailed in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.6. Habitats Regulations Assessment Report [APP-290], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349].</p> <p>Creation of new and enhanced habitat, where required, is set out throughout Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] including new areas of woodland planting, large new wetlands, qualitative enhancement of the River Stour corridor including new scrapes and invasive species removal, and management of 10 ha of arable land specifically for farmland birds, committed to for the duration of the converter station’s operational life.</p> <p>There is currently no legal obligation for Biodiversity Net Gain (BNG) on Nationally Significant Infrastructure Projects (NSIPs). However, National Policy Statements EN-1 and EN-5 set out the policies for environmental net gain and BNG as it currently applies to NSIPs. Legal BNG obligations are expected to be introduced for NSIPs in May 2026. There is currently no NSIP specific guidance available.</p> <p>Application Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] was updated in response to the Section 89(3) letter from PINS. The updated version, which includes all the appendices, can be found here: Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055].</p> <p>With regard to BNG, the Applicant has followed the Statutory Biodiversity metric (SBM). In accordance with Biodiversity Metric Principle 2, it has have ensured that the use of the metric does not override existing protections, legislative or policy requirements pertaining to protected sites and species</p>	<p>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</p> <p>Application Document 6.6. Habitats Regulations Assessment Report [APP-290]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [REP1-102]</p> <p>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</p> <p>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]</p> <p>Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055]</p> <p>Application Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297]</p>
Concern was raised around the adequacy of the golden plover mitigation land, due to its scale and location—close to the A256 Sandwich Bypass.	<p>Regarding the area proposed to offset loss of functionally linked land for golden plover, this area has been discussed and agreed with Natural England, who have not raised concerns on this matter in their Relevant Representation. Ecological suitability was a key factor in discussions with Natural England. Noise disturbance is not considered a significant concern; there are numerous examples of significant bird populations recorded roosting near to roads provided the habitat is sufficiently close to their low tide locations, and is sufficiently appealing as habitat, such as the A27 in Hampshire.</p> <p>Discovery Park is approximately 70 m from the mitigation fields at their closest and is well screened by dense tree growth either side of the A256 (such that the fields are dark at night away from the immediate vicinity of the A256). The vast majority of the mitigation land is much further from Discovery Park. There is no public access to the mitigation fields and there is no intention of introducing public access. There is a public footpath along the River Stour but that is on the opposite bank from the mitigation land and is also separated by a dense wooded belt. The impact of the loss of functionally-linked land is negligible after mitigation and using the correct bird numbers (a maximum flock of 370 individuals). 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 [REP1-071] assess the cumulative impacts of loss of functionally linked land. These reports conclude that addressing the loss due to the Proposed Project will also address its contribution to the cumulative “<i>in combination</i>” loss.</p>	<p>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 [REP1-071]</p>
Concerns were raised regarding the application of the mitigation hierarchy	The mitigation hierarchy was rigorously applied as part of the Proposed Project’s approach to consenting, set out in Application document 7.3 Design Development Report [App-321] and as part of the iterative process of EIA. The avoidance of environmental designations and other environmental constraints is an important factor which informs the Applicant’s site selection process.	Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	<p>This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. In considering these various factors, the Applicant uses reasonable judgement, in the context of the various statutory duties in the Electricity Act 1989 which include the duty to “<i>develop and maintain an efficient coordinated, and economical system of electricity transmission</i>” (which includes reducing costs on behalf of consumers), and also the duty to have regard to the desirability of conserving the environment and doing what can reasonably be done to mitigate effects. These duties are set out in Application Document 7.1 Planning Statement [AS-057].</p> <p>The application of the mitigation hierarchy is evident in the design of the Proposed Project. Although all potential landfall areas along the Kent coast are subject to various national and international nature conservation designations, Pegwell Bay was identified as the least constrained (technically viable) landfall option, with opportunities to avoid impacting the sensitive saltmarsh habitat using trenchless cable technology.</p> <p>The onward terrestrial cable corridor and the converter station and substation sites avoid designated sites altogether.</p> <p>While the AC overhead lines connecting into the existing network oversail a belt of dense trees and scrub which forms part of the Sandwich Bay and Hacklinge Marshes SSSI and continue into the Ash Level and South Richborough Pasture Local Wildlife Site, this is unavoidable recognising the need to connect into the existing network. Mitigation (including bird diverters to reduce the risk of bird strikes) have been applied, secured via a commitment (B54) in Application document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [App-342].</p> <p>The ongoing design refinements have similarly applied the principles of the mitigation hierarchy.</p> <p>The approach to project design, which embeds the mitigation hierarchy, is set out in Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368], Application document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369], Application Document 7.3 Design Development Report [APP-321], and Application document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [App-044].</p>	<p>Application document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]</p> <p>Application Document 7.3 Design Development Report [APP-321]</p> <p>Application document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [App-044].</p> <p>Application Document 7.1 Planning Statement [AS-057].</p>
Needs case		
Points were raised regarding a perceived absence of a strategic approach to planning for energy infrastructure	<p>While an overarching strategy for energy infrastructure may primarily be regarded as being a matter for government policy, a strategic approach to energy infrastructure delivery is reflected in the Clean Power 2030 ‘<i>Advice on achieving clean power for Great Britain by 2030</i>’ Report (November 2024) is the National Energy System Operator (NESO) analysis of what it considers to be the pathway to a clean power system by 2030.</p> <p>This report states that a major network expansion is needed to achieve this, and specifically that Sea Link is critical for the achievement of the Clean Power 2030 target. It also states that the delivery date for Sea Link required acceleration (from its licenced connection date in 2031 to its earliest in-service date of 2030). The report states that without Sea Link, consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>The Clean Power 2030 has not changed the plans for Sea Link, it only highlights the importance of its delivery.</p> <p>The process for making connection offers is overseen by the NESO. Generators apply to the NESO for connections to the transmission system, and the NESO makes a connection offer to the generator. The NESO has its own processes for assessing connection applications and the location and timing of connection offers, but this includes consideration of the location of generation, capacity of the existing</p>	No documents referenced

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	transmission network, and the costs of investing in reinforcement projects considered against the costs of constraining generation using constraints payments.	
Concerns were raised around the need for the project	<p>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].</p> <p>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:</p> <p>1. South East</p> <p>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.</p> <p>2. East Anglia</p> <p>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 Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this areas (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford.</p> <p>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.</p> <p>Sea Link represents a coordinated approach to solving the above issues using a single solution.</p> <p>A further summary of the needs case is set out in response to Action Point 1 in 9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].</p>	<p>Application Document 7.2 Strategic Options Back Check Report [APP-320]</p> <p>9.72.1 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]</p>
Some speakers acknowledged the need for the Proposed Project, supporting the principle even if they disagreed with the location.	The Applicant welcomes acknowledgement of the need for the Proposed Project in reinforcing the transmission network in the South East of England and East Anglia.	No documents referenced
Nemo Link		
Reference was made several times to the Nemo project including impacts during construction and residual effects on the saltmarsh	<p>It should be noted that Nemo Link was not developed by National Grid Electricity Transmission. It was developed by National Grid Ventures (NGV) and the Belgian Elia group. NGV is a different business to National Grid Electricity Transmission. These businesses are legally separate, with each business having no control, influence, or special insight into the activities of the other. Indeed, business separation is a requirement of the licence under which National Grid Electricity Transmission operates.</p> <p>Nonetheless, National Grid Electricity Transmission has coordinated and engaged with Nemo Link to gather insights into their project, and (notwithstanding that the Nemo Link project was developed and consented 12+ years ago). NGV is unable to confirm with certainty whether HDD was considered at the time and can only state that the consent granted was for an open-cut method, which is supported by publicly available planning documentation.</p>	<p>Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</p> <p>9.72.2 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A [REP1A-037]</p>

Topic/Themes raised by speakers	Applicant's Response	Relevant DCO Application documents
	<p>Publicly available planning documentation indicates that Nemo Link did not confirm its final cable installation methodology in its application. The 'worst case' assumed for ES purposes comprised an open cut methodology through the mudflat, although the Marine Management Licence (MMO) licence ref: L/2013/00373, dated 23 December 2013, listed open trench and backfill, jetting, skidded plough and horizontal directional drilling as licenced activities.</p> <p>The planning application and marine licence applications for Nemo Link, approved in 2013, were based on open cut installation techniques. The Nemo Link project (including cable installation technique) was proposed on this basis, assessed, and considered acceptable by Thanet and Dover District Councils and the Marine Management Organisation in 2013.</p> <p>It should also be noted that the route and technical requirements of the Nemo Link project were different to those of Sea Link. For example, the Nemo Link cable approached the landfall from a different angle, was routed towards a different end point (the separate converter station at Richborough Energy Park), and interacted with constraints and ground conditions (including a former landfill site within Pegwell Bay Country Park) differently.</p> <p>The feasibility of the Sea Link conceptual trenchless (HDD) design is assessed in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]. The methodology for the landfall is assessed as suitable, with key risks geotechnical and construction risks identified.</p> <p>One of the key risks identified is that of artesian chalk groundwater at the exit point. To address this, temporary coffer dams are planned to contain the groundwater and allow sealing of the installed ducts into the Thanet Formation that overlies the chalk and confines the aquifer. Further ground investigations at the exit area will inform the design of the coffer dams. See AP18 in 9.72.2 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A [REP1A-037] for further information on the further ground investigations. The coffer dams will be removed following sealing of the ducts into the surrounding ground.</p> <p>The length of the HDD within the chalk bedrock is not exceptional; previous landfalls that were successfully completed in chalk include:</p> <ul style="list-style-type: none"> • Dudgeon Wind Farm (2015), North Norfolk, 2 No. 1125m length HDDs • Dogger Bank Wind Farms A & B (2021), East Riding of Yorkshire, 4 No. 1400m length HDDs • Joss Bay Communications Cable (2022, 8.5km northeast of Pegwell Bay), over 2km length HDD <p>As an indication of the completion failure rate for HDDs, Riggall & Associates, the trenchless consultant appointed by the Applicant on the Sea Link project, have been on site steering over 120 HDDs with only one being abandoned. The reason for failure in that case, was that the drill was up a 140m high hill with the final 440m of the 1000m length drill being unsupported by drilling fluid and affected by ground collapse as a result.</p> <p>Of the 260 projects that Riggall & Associates have consulted on that have been constructed, none have been abandoned.</p> <p>Sea Link have undertaken geophysical surveys and ground investigation boreholes with in-situ and laboratory testing along the route that provide a detailed ground model along the HDD route. The ground model and previous experience in similar conditions show that the proposed HDDs at the location are entirely feasible</p>	

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
<p>A number of speakers made clear that the strong concerns expressed by many people at the hearings are based upon perceived failings of developers and contractors on previous energy projects, including Nemo Link and residual effects that are still being felt by farmers for example.</p>	<p>The Applicant acknowledges the concerns expressed by speakers on this issue. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid significant impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project. Specific measures to manage and control construction impacts are set out in the Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. These have been factored into the health and wellbeing assessment. For example, the Code of Construction Practice 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 working hours and noise and vibration reduction measures.</p>	<p>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</p>
	<p>Measures embedded within the Proposed Project’s design to mitigate the risks of pollution of the watercourses that would receive drainage discharges from operational above ground infrastructure (AGI) are summarised in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], which is secured through the Onshore CEMP as per Requirement 6 in Schedule 3 of the Application Document 3.1 draft Development Consent Order [AS-087].</p>	<p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342],</p> <p>Application Document 3.1 draft Development Consent Order [AS-087].</p> <p>Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]</p>
	<p>The agricultural use of land within the majority of the Order limits will only be impacted on a temporary basis, with agricultural uses able to continue following construction for land required for the installation of underground cables and temporary construction working areas.</p>	<p>Application Document 6.9 Water Framework Directive Assessment [APP-293]</p>
	<p>The cable route will be reinstated to its previous use and therefore farming operations are able to continue post construction. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]).</p>	
	<p>A summary of embedded and good practice measures (as identified in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]) relevant to the WFD assessment is provided in Appendix A of Application Document 6.9 Water Framework Directive Assessment [APP-293].</p> <p>The Applicant is and will continue to work with all landowners including tenants who may be affected by the proposals to understand the impacts on their operations and to work with them as the construction programme is developed. National Grid will seek to work with the farming community to limit disruption where practicable. The cable route will be reinstated to its previous land condition and therefore farming operations will be able to continue post-construction. The final cable route and associated accommodation works will be discussed and agreed prior to commencement of construction to ensure disruptions to normal farming operations are limited. Compensation claims for disturbance will be considered on an evidenced basis, and landowners and farmers will therefore be encouraged to keep records to support their claims.</p>	
Noise, vibration and light pollution		
<p>Concerns were raised about noise levels from construction activities (particularly piling) and generation of additional light pollution</p>	<p>The impacts of potential light, noise and air quality/dust pollution from the construction phase have been assessed as part of the EIA and are reported within the ES within each of the relevant technical chapters:</p> <ul style="list-style-type: none">• Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061];• Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]; and• Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [AS-111]. <p>The above documents conclude that with mitigation there will be no likely significant effects. Measures to control pollution from the construction works are set out in Application Document 7.5.3 (B)</p>	<p>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</p> <p>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</p> <p>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [AS-111]</p>

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
	Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [REP1-102].	Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127] Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [REP1-102]
Risks to birds posed by pylons		
Some speakers identified concerns about the impacts of constructing more pylons of varying heights and the need for bird diverters. It was also questioned, why, given the perceived risk to birds, if cables are going under the sea (for much of the project), they cannot go underneath the River Stour instead of pylons crossing it?	<p>The Applicant acknowledges these perspectives and highlights that it has been agreed with Natural England that the proposed new section of overhead line is unlikely to materially affect collision risk for interest features of either Thanet Coast & Sandwich Bay SPA or Stodmarsh SPA, and thus the East Atlantic Flyway. The assessments conclude that whilst there would be some significant adverse effects on ornithology in the short-medium term, the creation of habitats as part of the Proposed Project would lead to a significant beneficial effect on ornithology, in the long term.</p> <p>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 (B55) is secured through Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].</p> <p>The amount of overhead line incorporated into the project is only a relatively small length of the overall connection provided. Where overhead lines are proposed, alternative options have been extensively assessed and while there may be perceived visual benefits associated with the use of underground cables, on balance, overhead lines involve less impact on Minster Marshes during construction and over the lifetime of the asset. Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] explains that the soil conditions of shallow groundwater make trenching difficult to manage without dewatering and the low-lying marshland within the fluvial floodplain of the River Stour may also make reinstatement of any underground cable route more challenging, resulting in the temporary construction effects of the underground option enduring longer than in other soil types.</p>	<p>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</p> <p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].</p>
Security		
Several respondents highlighted concerns that a converter station may be a high-risk target for terrorism or in the event of war.	<p>While the Applicant is unable to comment in significant detail regarding security measures, as an operator of national infrastructure, National Grid 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.</p> <p>The Applicant follows government advice, industry standards and best practice. Furthermore, the network is designed to allow for potential equipment failure or disruption and be able to continue to deliver safe, secure and reliable electricity.</p> <p>As new assets are built, significant changes are made to any site. In the event that the threat landscape changes, security is considered/reviewed accordingly.</p>	No documents referenced

Topic/Themes raised by speakers	Applicant’s Response	Relevant DCO Application documents
Tourism impacts	<p>Concerns were raised about the effects of construction and the presence of new infrastructure on tourism and local attractions (particularly sites of historic importance), emphasising the importance of tourism within the local economy. Reference was made to three hospitality businesses located close to the landfall site.</p> <p>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. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, such that any likely significant effects of the Scheme have been identified and mitigated. Section 10.9 of Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070] assesses potential effects of the Scheme on private and community assets, recreation and tourism within a 500m study area from the Proposed Project’s RLB. This is in line with recognised guidance (such as the National Highways (formerly Highways England) guidance published in DMRB LA112 (Highways England , 2020)) as 500 m is the distance threshold which is typically considered to represent the extent of trips people are willing to take before they change their habits and do something else. In addition, and for the purposes of the assessment, any receptors beyond 500 m which were impacted by the Proposed Project were assessed.</p> <p>The Applicant also recognises potential changes to landscape views and traffic during construction of the Proposed Project, which could impact on desirability of and access to visitor attractions in the local area. Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070] identifies that there are four visitor attractions within 500 m of the Onshore Scheme Order Limits, namely St Augustine’s Cross, Richborough Roman Fort and Amphitheatre, World War Two Military Prison and Viking Ship Hugin. Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] outlines that there is potential for adverse visual amenity impacts on visitors to Richborough Roman Fort, which has been included as Viewpoint 8. Effects on Richborough Roman Fort have been assessed as a representative view from this location and was assigned a very high sensitivity. As set out in Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098], filtered and partially screened views of construction activity would be visible from Viewpoint 8 predominantly in the distance. Any vegetation removal would be localised and would predominantly not be considered to be perceptible at distance. As such, the magnitude of visual change is assessed as small, and the resulting effect is minor adverse (not significant). Therefore, it is not expected that views of construction will impact upon the use, desirability and importance of this site as a visitor attraction.</p> <p>In terms of traffic, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] concludes there are no roads assessed that would experience significant severance effects during construction. Section 7 of Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338] includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase. Therefore, there are no significant severance effects identified between residents, visitors and local assets. As a result, the likely effect on Richborough Roman Fort during construction is not significant.</p>	<p>Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070]</p> <p>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</p> <p>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]</p>
Trenchless design	<p>Concern was raised with regard to the feasibility of the trenchless/Horizontal Directional Drill (HDD) design, with claims that a sediment assessment is essential.</p> <p>The Applicant is confident that a trenchless approach beneath the sensitive saltmarsh is deliverable. This is based on a good understanding of the ground conditions, having identified risks at the early stage and undertaken thorough ground investigations and geophysical surveys along the route to make sure that the HDD is a success.</p> <p>The feasibility of the Sea Link conceptual trenchless design is assessed in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]. The methodology for the landfall is assessed as suitable, with key geotechnical and construction</p>	<p>Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321].</p> <p>9.72.2 Applicant’s Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A.</p>

Topic/Themes raised by speakers	Applicant's Response	Relevant DCO Application documents
	<p>risks identified. A further written response is provided in response to Action Point 16 document 9.72.2 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A.</p> <p>Application Document 9.20.2 Landfall Sediment Modelling Report Pegwell Bay [PDA-038] assesses potential morphological changes around the Pegwell Bay HVDC landfall using historical data, conceptual understanding of coastal processes, and sediment modelling.</p>	<p>Application Document 9.20.2 Landfall Sediment Modelling Report Pegwell Bay [PDA-038]</p>

2.2 Applicant’s Responses to Oral and Written Submissions – Factual Errors

Table 2.2 Applicant’s response to what are considered to be factual errors that it is necessary to rebut.

Themes	Applicant’s Response	Relevant DCO Application documents
An assertion was made that National Grid wants to build in Kent because of the short distance across the English Channel, allowing it to sell energy to European neighbours with both the greatest ease and the greatest profit.	<p>The Proposed Project is a network reinforcement designed to transmit electricity domestically. It is not an interconnector.</p> <p>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.</p>	No documents referenced
The Minster converter station site is an area of high flood risk.	The proposed Minster converter station and substation site lies within Flood Zone 1, indicating the lowest risk of fluvial flooding. While there is a possibility of elevated groundwater levels and localised groundwater flooding, this risk will be mitigated by constructing the new infrastructure on a raised platform.	No documents referenced
A comment claimed that Sea Link is simply another phase of Nemo Link	Nemo Link is an interconnector consisting of subsea and underground cables connected to converter stations and electricity substations in Belgium and Great Britain. The Sea Link Project is a proposal by National Grid Electricity Transmission plc to reinforce the transmission network in the South East of England and East Anglia, as outlined in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]
One speaker expressed the opinion that Sea Link DCO documents present a retrospective representation of a predetermined selection process (in Kent)	<p>This is not correct. The Applicant’s approach to site selection is comprehensive and robust. There is substantial information in the application that has been subject to extensive public and stakeholder consultation between 2022 and 2024, setting out the justification for the proposed landfall location and converter station site. This includes substantial information on the alternatives in the Richborough area that were considered and presented during previous consultations.</p> <p>The process of selecting sites to accommodate new infrastructure was undertaken in accordance with the National Grid’s approach to project development, as set out in Application document 7.3 Design Development Report [App-321]. This involves a balanced consideration of various environmental, socio-economic, engineering, and cost factors, which (alongside consultation, ongoing survey work, and back checking) inform reasoned judgements as to what the most appropriate project design to take forward.</p> <p>As set out in Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368], the Proposed Project considered two converter station option areas within which converter station sites could be located. These areas were identified based on the potential to site adjacent to similar infrastructure, avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements. The option area closest to Richborough substation (option Area A) was preferred, due in part to its proximity to the network and the opportunity to locate the infrastructure close to similar energy development at Richborough Energy Park. Notwithstanding these conclusions, the Applicant continued to review the suitability of this site as the design evolved, and feedback from stakeholders and survey findings was taken into account.</p> <p>Other locations considered at the strategic options stage are set out in Application document 7.2 Strategic Options Back Check Report [App-320].</p>	<p>Application document 7.3 Design Development Report [App-321]</p> <p>Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]</p> <p>Application document 7.2 Strategic Options Back Check Report [App-320]</p>
It was claimed that traffic has already worsened since the opportunity to register as an interested party closed.	Current activity in this area associated with the Proposed Project is extremely limited, therefore any increases in traffic and delays will be as a result of other factors.	No documents referenced

Themes	Applicant's Response	Relevant DCO Application documents
It was alleged that National Grid has already brought land near the Southern Water Works site, which has permission for a grid stability facility—suggesting that they have been planning to use Minster Marshes for a long time.	This is not a project promoted by the Applicant. The project referred to is for installation and operation of a Grid Stability Facility consisting of synchronous compensators and associated electrical infrastructure, underground cabling, access tracks, drainage, temporary construction compound and ancillary infrastructure. Planning permission was granted by Thanet District Council in 2023.	No documents referenced
Some speakers suggested significant variations have been quoted in HGV trip estimates for transporting aggregate to construct the converter station foundation.	Total traffic movements have not been included within the DCO Application. The figures quoted in the hearings have not been provided by the Applicant and the Applicant will not comment on estimates derived from third party calculations and speculation about vehicle choice and load capacity.	No documents referenced
The Hoverport is a nationally important nature reserve in its own right.	While the natural regeneration of the former hoverport site is acknowledged and it is located immediately adjacent to the SPA, SAC, NNR and SSSI designated areas it is nonetheless outside of these areas. Furthermore it is not identified as a non-statutory Local Wildlife Site.	No documents referenced
It was suggested that with all of the development that is being allowed in Thanet—industrialising the character of the area—it is being treated as a ‘zone of sacrifice’.	<p>The requirement for the Proposed Project to locate in this area clearly set out Application Document 7.2 Strategic Options Back Check Report [APP-320] and 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124].</p> <p>Planning policy and legislation provide a framework for protecting landscapes from unacceptable harm. The inter-project cumulative effects chapter should be referred to at Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. It is acknowledged that there is the potential for significant residual adverse effects when considering total cumulative effects on the eastern periphery of the local Landscape Character Area E1 in relation to Richborough Energy Park developments (ID79, ID356, ID512) and the Land Adjacent to Southern Water's Waste Water Treatment Site (ID141).</p> <p>Opportunities for coordination between proposed projects has been explored across the whole of the Proposed Project. The siting of the Minster Converter and Substation has sought to reduce the potential spread of infrastructure and to concentrate development in a single area, through siting close to the Richborough Energy Park. However, opportunities for coordination in Kent are limited. Further information is set out in Application Document 7.10 Coordination Document [APP-363].</p>	<p>Application Document 7.2 Strategic Options Back Check Report [APP-320]</p> <p>9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]</p> <p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</p> <p>Application Document 7.10 Coordination Document [APP-363]</p>
The storage of aggregate on the hoverport site poses a risk to the habitat and species in the area.	The former hoverport is proposed only for construction and maintenance access. It is not proposed for the storage of construction plant or materials, such as aggregate.	No documents referenced
One speaker claimed that sand/aggregate needed to make the converter station site suitable for building upon apparently will come from Goodwin Sands.	The landfill requirements for the Proposed Project have not been finalised but there is no intention to extract any material from Goodwin Sands.	No documents referenced

There are no sources in the current document.

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