

Sea Link

Volume 9: Examination Submissions

Document 9.108: Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 5

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1. About this Document

1.1 Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Action Points addressed to the Applicant arising at Compulsory Acquisition Hearing 1 held on 27 January 2026 and Issue Specific Hearing 2 (ISH2) held 28 to 30 January 2026, in respect of the Sea Link Project. This is in respect of points due to be addressed at deadline 5.

1.2 Structure

1.2.1 The Examining Authority (ExA) issued a list of action points during the Hearings and subsequently published them in written form on 2 February 2026, in the following documents:

- Action Points arising from Compulsory Acquisition Hearing 1 (CAH1) held on Tuesday 27 January 2026 [EV6-034]; and
- Action Points arising from Issue Specific Hearing 2 (ISH2) on environmental issues held on Wednesday 28 January to Friday 30 January 2026 [EV6-033].

1.2.2 This document provides responses to those actions, due at Deadline 5, that were specifically addressed to the Applicant. Where appropriate, the Applicant has made minor stylistic or grammatical adjustments to the wording of the action points for clarity; however, these changes are not considered material and do not alter the substance of the actions or the Applicant's response.

1.2.3 Where the Applicant made commitments to provide further information at Deadline 5 in **Application Document 9.90 Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) –Deadline 4 [REP4-086]**, the Applicant's updated response has been included below against the relevant original Action Point.

2. Applicant's Response to Compulsory Acquisition Hearing 1

2.1 The Applicant's Response to Actions Table

Table 2.1 Response to Compulsory Acquisition Hearing 1 (27 January 2026)

Action No.	ExA Description	Applicant's Response	Deadline
AP3	Provide response in relation to suggested alternative routes provided by SCC at DL4.	The Applicant has responded to Suffolk County Council's suggested alternative routes to Saxmundham Converter Station [REP4-149] in 9.107: Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station that is submitted at Deadline 4.	Deadline 5
AP12	Consider the removal of Suffolk plots 4/27, 4/28 and 1/97 identified as Class 10 from the order limits. Any change to be submitted before DL5.	<p>Plot 1/97 in Suffolk is marked as Class 10. It is 19 square metres of public highway.</p> <p>A further 2 plots of class 10 have been added at Deadline 4. In in Suffolk plot 1/5a is now white land and in Kent 4/19a is white land which removed Southern Water as a Category 1 interest.</p> <p>The Applicant notes that it is not unusual for a DCO to be made whilst containing land where there are no powers sought. In the extant case, the salient land powers are contained in the draft DCO at articles 24, 25 and 27. The ExA expressed concern that, without amending the Order Limits, the land would still be 'Order Land'. "Order land" means the land shown on the Land Plans and described in the Book of Reference. It merits noting that 'Land' is defined in the primary legislation, being the 2008 Act, at S.159 (relating to Part 7 of the Act which includes the CA provisions), as including 'any interest in or right over land'.</p> <p>Turning then to the operation of that term, article 24 allows CA of Order Land in the BoR as is required for construction, operation and maintenance. Hence the power does not extend to more than the Undertaker needs, and indeed is constrained by the BoR (in the tables, see column 2 of Part 1), which itself sets out the Classes of Rights applicable to each plot. As noted above, 'Order Land' (by virtue of the definition in the Act of 'land') includes those interests or rights – hence the BoR can and does specify the 'Order land' interests or rights. The same analysis applies to article 25, such that rights may only be taken over the Order Land, as described in the BoR. In terms of temporary use, Article 27(1) enables temporary possession of land described in the BoR and listed in Schedule 11 (temporary use only), and 27(2) refers to 'any other Order Land'. This last point is, we understand, the ExA's concern. The Applicant is of the view that, due to the definition of Order Land, Article 27 is limited by the description in the BoR, which in particular at Part 1 column 2 describes both the spatial limit of the land immediately alongside the nature of the class of right, and more generally in the BoR makes clear that any Class 10 land is not subject to powers of acquisition nor temporary use.</p> <p>However, notwithstanding the Applicant's response above, to help on this point, the Applicant would be content to offer a commitment (potentially via the REAC) to confirm that in respect of the Class 10 land, that the Applicant will not carry out any part of the Authorised Project in respect of that land, save to the same degree that it could pursuant to the powers which prevail outwith the Order Limits (eg the survey power in Article 22).</p>	Deadline 5

Action No.	ExA Description	Applicant's Response	Deadline
AP19	Request affected persons withdraw objections when agreement is reached.	The Heads of Term documents in negotiation will require that on agreement of the HoTs the affected party withdraws their objection to the compulsory acquisition of land. The landowner is however free to maintain any objections to the DCO Application on grounds beyond the CA of land.	Ongoing

3. Applicant's Response to Issue Specific Hearing 2

3.1 The Applicant's Response to Actions Table

Table 3.1 Response to Issue Specific Hearing 2 (28 to 30 January 2026)

Action No.	ExA Description	Applicant's Response	Deadline
Landscape and Visual			
AP51	The ExA notes the applicant's comments in response to the first written question 1LVIA4 and the provision of the illustrated lux plots. However, there is insufficient information to assess the lighting effects in areas of relatively dark skies. A more detailed nighttime assessment is therefore requested.	A nighttime assessment is provided within Application Document 9.124 Landscape and Visual Nighttime Assessment submitted at Deadline 5.	Deadline 5
Cultural Heritage			
AP54	Applicant to provide a similar list of heritage assets to the scoped-out list in [REP3-070], but for all the heritage assets scoped in for any level of ES assessment, clearly stating the anticipated impact of both the Sea Link and cumulative impact to the significance of these assets.	A response was provided to this action point within Application Document 9.90 Applicant's Response to January Hearing Action Points – Deadline 4 [REP4-086] . Wood Farmhouse was included in the ES as a designated heritage asset, however, it has been delisted since submission of the DCO application for the Proposed Project. Effects to the asset, which is now viewed as a potential non-designated heritage asset, have been reassessed and an updated assessment is provided within Application Document 9.27 Updated Archaeological Assessment - Suffolk submitted at Deadline 5.	Deadline 4
AP55	Applicant to submit a more thorough and detailed assessment of the cumulative impacts on settings of cultural heritage assets and the historic wider landscapes.	<p>A detailed assessment of the cumulative impacts on setting of cultural heritage assets was provided in response to AP54 within Application Document 9.90 Applicant's Response to January Hearing Action Points – Deadline 4 [REP4-086].</p> <p>As noted in the response to AP54, Wood Farmhouse has been delisted and an updated assessment submitted at Deadline 5 in response to Examiner's Second Questions 2CH1. This reflects the lower heritage value of the asset. This has included consideration of cumulative impacts as appropriate.</p> <p>In addition, a detailed assessment of cumulative effects to historic landscape is provided within Application Document 9.125 Assessment of Cumulative Effects on the Wider Historic Landscapes submitted at Deadline 5.</p>	Deadline 4
Traffic and Transport			
AP59	Updates provided for junction modelling for both Kent and Suffolk (to include cumulative traffic), if the modelling is not fully submitted at DL4.	<p>The proposed scope of junction capacity modelling for three junctions within Kent (namely: Sevenscore, Ebbsfleet and Minster roundabouts) was reviewed and agreed with KCC Highways on 15 January 2026. The results of the junction capacity modelling are provided within Application Document 6.3.3.7.A ES Appendix 3.7.A (B) Transport Assessment Note submitted at Deadline 5.</p> <p>The scope and methodology for the junction modelling for Suffolk was further discussed with SCC at a meeting held on 24 February 2026. The results of junction modelling for the A12/B1121 Main Road junction (south of Saxmundham), the A1094/ B1121 Aldeburgh Road junction and the A1094/ B1069 Snape Road junction, which represent the key junctions to be used by construction traffic associated with the Proposed Project, will be submitted within an</p>	Deadline 4

Action No.	ExA Description	Applicant's Response	Deadline
AP61	Applicant to provide an updated cumulative traffic assessment based on an updated list of other projects and developments or provide an update as to when this will be submitted.	<p>updated version of Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122] to be submitted at Deadline 6. National Highways has also confirmed that no junction modelling is required for the Strategic Road Network (SRN) within Suffolk, including the A12/ A14 Seven Hills Interchange. This confirmation was provided in Additional Submission AS-165 dated 22 February 2026.</p> <p>In addition to the above, the Applicant has provided further details on the proposed approach and anticipated timescales of providing the results of the junction modelling as part of their response to the Examining Authority's Second Written Question 2TT8.</p> <p>The Applicant has reviewed the list of additional cumulative schemes identified by KCC Highways on 15 January 2026 (during a transport meeting) and has either not found any additional information (such as traffic forecasts) to inform an updated cumulative assessment or otherwise considers these schemes to not have the potential for significant cumulative effects due to their nature, scale and size, having already been captured by the background TEMPro growth applied to the network to account for the delivery of 2,500 additional households in Thanet between 2024 (surveyed year) and 2030 (future Base year). No updates are therefore required and the Traffic and Transport cumulative assessment in Kent continues to be based on the 10 cumulative schemes which were screened in and assessed within Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].</p> <p>This includes peak construction trips for seven schemes (partially built-out) in combination with operational trips for nine schemes (with two fully built-out), with the worst-case assumption that the peak construction phases of the schemes under construction would all directly overlap with the peak construction phase of the Proposed Project. The cumulative assessment includes Manston Airport, along with residential and mixed-use schemes, including operational traffic associated with more than 4,000 total dwellings, as well as care homes, commercial floor space and schools. The Traffic and Transport cumulative assessment therefore remains robust and has informed the junction capacity modelling which has been submitted at Deadline 5.</p> <p>The Applicant has reviewed the list of additional cumulative schemes identified by SCC Highways during recent consultation (e.g. meeting on 22 January 2026) and has either not found any additional information (such as traffic forecasts) to inform an updated cumulative assessment (including for the Helios scheme and the Essex and Suffolk Water pipeline) or otherwise does not consider these schemes to have the potential for significant cumulative effects to arise due to their nature, scale and size. For example, the Applicant has reviewed construction traffic forecasts for the A12 Major Road Network (MRN) scheme based on the Transport Assessment (dated November 2025) submitted for that scheme which shows that the construction peak (early 2027) would not overlap with the construction peak of the Proposed Project, that there would be no additional vehicle trips on the network during the assessed shoulder or network peak hours and that there would be fewer than 30 vehicles per hour along the A12 (through the study area) during the other hours. Furthermore, the Applicant has thoroughly reviewed the latest construction traffic forecasts available for East Anglia TWO Offshore Windfarm (EA2) within their Construction Traffic Management Plan (dated November 2025) and for LionLink Offshore Interconnector within their PEI Report (dated January 2026). This latest information has not resulted in any changes to the previous worst-case traffic parameters/ assumptions that were adopted for the assessment of these schemes as the EA2 forecasts are within parameters previously assessed and no quantitative traffic and transport information has been provided within the PEI Report for LionLink. No updates are therefore required and the Traffic and Transport cumulative</p>	Deadline 4

Action No.	ExA Description	Applicant's Response	Deadline
		<p>assessment in Suffolk therefore remains to be based on the eight cumulative schemes which were screened in and assessed within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This includes peak construction trips for five schemes in combination with operational trips for three schemes, with the assumption that the peak construction phases of the schemes under construction would all directly overlap with the peak construction phase of the Proposed Project. The cumulative assessment includes the Nationally Significant Infrastructure Projects (NSIPs) Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink Offshore Interconnector. The Traffic and Transport cumulative assessment therefore remains robust and will inform the junction capacity modelling which will be submitted at Deadline 6 within Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122].</p>	
Noise and Vibration			
AP68	<p>Applicant to respond to:</p> <ul style="list-style-type: none"> • (1) Appendix B of the applicant's Pegwell Bay Construction Method Technical Note [REP2-011] states 'not available' under the sound source for the Offshore trencher, argocat and mass flow excavator. Does this mean that these elements were or weren't assessed and in which case what assumptions were used and what are the implications for the noise contour mapping? • (2) The applicant's response to ExQ 1NV15 [REP3-069] explains that noise contour mapping work assumes that the hoverport is soft ground and that this is proportionate due to the size of the area modelled. Given that the hoverport is largely hardstanding with vegetation and that it will be extensively used by construction vehicles, can the applicant provide further justification for this assumption? • (3) First written question 1NV4 [PD-017], asked about use of hovercraft in Pegwell Bay. The applicant's response to 1NV4 [REP3-069] explains that the use of hovercraft is for safety purposes only and won't be used on a regular basis. Can the applicant explain how they would be brought to the site and how they would be stored? Can the use of the hovercraft be limited to emergency use in the dDCO or REAC? • (4) ExQ 1MO4 [REP3-069] regarding piling noise levels and the use of an LAFmax of 91dB at 10m. This confirmed that the maximum piling noise level in the applicant's data set was 104dB but values were more typically in the low 90dB range. Is the applicant able to provide this dataset to the examination to support this assumption? • (5) At DL3 the applicant provided an operational noise contour plan for Saxmundham [REP3- 075]. Produce a similar plan for Minster converter station. • (6) Explain why in figure 2 of the Operational Noise contour Plan [REP3-075] the noise level change 	<p>Please refer to response to AP68 within Application Document 9.90 Applicant's Response to January Hearing Action Points – Deadline 4 [REP4-086] for responses to points 1, 2, 3, 4 and 6.</p> <p>With regards to point 5, an operational noise contour plan for Minster Converter Station is provided within Application Document 9.102 Operational Noise Contour Plan for Minster Converter Station submitted at Deadline 5.</p>	Deadline 4

Action No.	ExA Description	Applicant's Response	Deadline
	contours are being compared with a 38dB LAeq8h level.		
AP70	Provide a detailed assessment of low frequency noise impacts for proposed operational sites, based on the most up to date level of design detail available, incorporating comparison of dB(A) and dB(C) levels.	An assessment, incorporating a comparison of A-weighted (dBA) and C-weighted (dBC) operational sound levels, is provided at Deadline 5 in Appendix D Comparison of dBA and dBC Operational Sound Levels of this document.	Deadline 5
Shipping and Navigation			
AP90	Applicant to provide update on avoiding planned cable joints in the areas of interest, taking into account the Port of London Authority's (PLA) view that it needs to be secured through a condition on the DML and that the REAC is not sufficient.	The Applicant confirms that the DCO and dML have been updated in line with recent comments from the Port Authorities around the Areas of Safeguarded Water Depths.	Deadline 4
Cumulative Effects			
AP107	Update relevant Sea Link cumulative and in-combination assessments based on the new information released for LionLink, including but not limited to the Environmental Statement, Habitats Regulations, Marine Conservation Zone and WFD assessments.	<p>A review of the updated information published by NGV for the LionLink project on 13 January 2026 has been completed and are reported in Appendix C to this document. The newly published information has not changed any of the assessment findings included in the original cumulative assessments contained in:</p> <p>6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060]</p> <p>6.6 Habitats Regulations Assessment Report [APP-290]</p> <p>6.9 Water Framework Directive Assessment [APP-293]</p> <p>6.11 Marine Conservation Zone Assessment [APP-296]</p>	Deadline 5
AP108	Note confirming timescales for producing the updated cumulative assessments referred to in the previous action point.	As the review reported in Appendix C in 9.108.1 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 - Appendices has not identified a need for any updates to cumulative assessments, it is not necessary to provide updated timescales.	Deadline 4
AP109	Cumulative visualisations to be prepared using information now available for LionLink. This will include the LionLink converter station. Provide clarification as to whether this will include the additional bays to Friston substation required for LionLink as set out in their statutory consultation documentation.	<p>Winter year 1 cumulative visualisations were prepared and submitted at Deadline 4 using information now available for LionLink (refer to Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]).</p> <p>Additional cumulative visualisations have now been prepared to show the updated Friston Scenario 2 outline landscape mitigation (Figure 5 of Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]). They have also been updated to reflect the current detailed design footprint and tower locations for Kiln Lane substation. The updated cumulative visualisations from viewpoints 6A, 7 and 22 are contained in Appendix A Additional LionLink Cumulative Visualisations.</p> <p>Whilst updating the above LionLink cumulative visualisations using the current Kiln Lane substation detailed design drawings, it became apparent that the Kiln Lane substation footprint and tower positions had slightly changed from those used previously in Sea Link Friston Scenario 2 visualisations. Consequently, updates have been made to all representative viewpoints from which Friston Scenario 2 would be visible in the view (either because of intervisibility with the substation or towers). They have also been updated to reflect the</p>	Deadline 4

Action No.	ExA Description	Applicant's Response	Deadline
		updated Friston Scenario 2 outline landscape mitigation (Figure 5 of Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]). The following visualisations have been updated and are contained in Appendix B Friston Scenario 2 Visualisations : viewpoints 1, 6a, 7, 8a, 9, 15, 16, 18, 22 and 23.	
AP110	Update list of committed developments in inter-project cumulative assessments and provide supporting note to assessment approach.	The Applicant responded to this action point at deadline 4 in 9.90 (A) Revised version of Appendix C to Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-087] . An updated long list and short list of other existing and, or approved development will be provided at deadline 6 which will include a more comprehensive list of additional marine projects.	Deadline 4
Draft Development Consent Order			
AP119	Confirm which documents are submitted in outline and set out details of the relevant planning authorities and consultees (such as the EA) in a table within the explanatory memorandum.	The Applicant submitted a revised version of the draft Development Consent Order [REP4-217] and Explanatory Memorandum [REP4-219] at Deadline 4A which included the table of the relevant discharging authorities. A further version of these documents is submitted at Deadline 5. In response to comments made by Interested Parties, the Applicant has also provided Outline Material and Waste Management Plans at Deadline 5 and secured these in Requirement 6 .	Deadline 4
AP120	Councils and consultees to provide comments on the table setting out the relevant planning authorities and consultees.	To be actioned by local councils and consultees.	Deadline 5
AP124	Consider whether a specific noise design parameter is required in relation to the converter and substation sites, equivalent to requirement 12 of the EA1 North DCO.	<p>The Applicant considers the following to be suitable conditions for operational noise from the proposed substations and converter stations. These conditions are separate to commitments NV07 and NV09 of Application Document 9.84 Register of Environmental Commitments (REAC) [REP4-235] to seek to achieve operational noise levels as low as reasonably practicable (ALARP).</p> <p>The commitments are set out below, and have been added to the updated Register of Environmental Actions and Commitments (REAC) submitted at Deadline 5 as follows:</p> <p><u>For Saxmundham Converter Station (Suffolk) and for Minster Converter and Substation (Kent):</u></p> <p><i>During normal operation of the proposed converter station/substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall not exceed 34 dB L_{A,r,T} at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent).</i></p> <p><i>The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.</i></p> <p><u>Friston Substation (Suffolk):</u></p> <p><i>During normal operation of the proposed substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall be at least 5dB below background noise levels at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent).</i></p>	Deadline 4

Action No.	ExA Description	Applicant's Response	Deadline
		<i>The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.</i>	

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