

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

**Document 9.146: Applicant's Response to Relevant Representation Response –
Statkraft UK Limited [RR-5075]**

Planning Inspectorate Reference: EN020026

**Version: A
April 2026**

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1. Applicant’s Response to Relevant Representations: Statutory Undertakers

1.1 Statkraft UK Limited

- 1.1.1 The Applicant appreciates the engagement from Eversheds Sutherland on behalf of Statkraft as a Developer within the Order Limits of the Sea Link Project.
- 1.1.2 At the Third Compulsory Acquisition Hearing in March 2026 the point was raised that Statkraft submitted a Relevant Representation (reference RR-5075).
- 1.1.3 The Applicant has reviewed and provided a response as set out in the table below. The Applicant has considered the issues raised in the RR and directs the Examining Authority to the relevant sections of the application where these matters are addressed.

Table 1.1 Applicant’s Response to the Relevant Representation of Statkraft UK Limited RR-5075 – Developer 1

Reference	Relevant Representation Comment	Applicants’ response
RR-5075.01	<p>Eversheds Sutherland (International) Limited are instructed by Statkraft UK Limited (Statkraft) to submit a relevant representation in relation to the DCO application submitted by National Grid Electricity Transmission (the Applicant) for the ‘Sea Link Project’ as more particularly described in the application documents (the Project).</p> <p>Statkraft UK Limited is part of the Statkraft group; Europe’s largest renewable energy producer and a</p>	<p>The Applicant thanks Eversheds Sutherland for their relevant representation in respect of Statkraft's proposed Greener Grid Project in Kent.</p> <p>The Applicant can confirm Statkraft are listed as a Category 2 Interest in plots; 3/28, 3/31, 3/32, 3/38, 3/39, 3/41, 3/46, 3/47, 3/74, 3/75, 3/76, 4/5 which are associated with works numbers, 6,8,7 & 9A – Marine Electric line works, an underground electric line in Kent, Kent temporary work compounds and Access Road to the Kent Converter Station and the Kent Substation.</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>global company in energy market operations. With around 7,000 employees in more than 20 countries, the group produces hydropower, wind, solar, gas-fired power and supplies district heating. Statkraft UK has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 4.5 GW of new-build renewable energy generation through PPAs. Statkraft UK is a major provider of grid stability services to support NESO's target to deliver a fully zero-carbon electricity system by 2035.</p> <p>Statkraft has an interest in land included in the Order Land by virtue of an Option to Lease Agreement dated 9 December 2022 that has been entered into with the freehold landowner, Ebbsfleet Minister (Kent) Limited (the Option). The Option has a term of five years from the date of the agreement (expiry date of 9 December 2027, if it is not extended).</p> <p>The Option grants Statkraft the rights to take an option over an area of the Order Land for a 'Greener Grid Park'. Statkraft is modelling the feasibility of the technology options with a view to optimisation at this location. This will comprise a grid support project that could include (but is not limited to) provision of energy storage, flexibility, capacity, stability, frequency response and/or services to the Network Operator (the Statkraft Project).</p> <p>The development of renewable energy projects is essential for addressing climate change and delivering the Government's target of Net Zero by</p>	<p>The Applicants note Statkraft's ongoing commitment and work toward Net Zero. The need for Sea Link is also driven by the UK Government's commitment to reach net zero by 2050 and the delivery of up to 50GW of offshore wind energy by 2030 as set out in the Environmental Statement, Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction [APP-042].</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>2050, and to support grid decarbonisation objectives by 2035 – the proposal by Statkraft at this location would serve to support those aims.</p>	
RR-5075.02	<p>The area of land that benefits from the Option is shown shaded pink on Appendix 1 (the Option Land). This is overlaid by the red line boundary of the Order Land. The Option land is currently being used as agricultural land.</p> <p>We have reviewed the Applicant's Book of Reference (Applicant Ref: 4.1) Land Plans (Applicant Reference: 2.3) (specifically Sheets 3 and 4) and draft Development Consent Order (Applicant Reference: 3.1).</p> <p>We note the following interfaces with the Option Land:</p> <p>3/28 Class 1. Compulsory Acquisition of land</p> <p>3/31 Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure</p> <p>3/32 Class 6. Compulsory Acquisition of Rights – Drainage</p> <p>3/38 Class 3. Compulsory Acquisition of Rights – Underground Cable System</p> <p>3/38 Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure</p> <p>3/39 Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure</p> <p>3/41 Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure</p> <p>3/46 Class 3. Compulsory Acquisition of Rights – Underground Cable System</p> <p>3/47 Class 3. Compulsory Acquisition of Rights – Underground</p>	<p>As noted above, these land references and associated uses are acknowledged by the Applicant. We will engage directly with Statkraft to understand further their proposed project and timelines and thereafter on an ongoing basis in order to secure appropriate agreements for the coexistence of the respective projects.</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>Cable System 3/74 Class 5. Compulsory Acquisition of Rights – Access 3/75 Class 8. Temporary use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure 3/76 Class 3. Compulsory Acquisition of Rights – Underground Cable System 4/5 Class 5. Compulsory Acquisition of Rights – Access</p> <p>Taken together the Applicant is proposing a suite of powers of permanent acquisition and the acquisition of new rights over areas of the Option Land for the purposes of the construction and operation of the Project. Furthermore, the Applicant requires temporary use of parcels of the Option Land during the construction phase of the Project.</p> <p>Sheet 3 of the Works Plans (Applicants Reference: 2.5.2) indicates that the nature of the works that will overlap with the Option Land comprise works for the permanent installation of HVDC cable (Work Numbers 6 and 7) temporary construction compound infrastructure (Work Number 8) and access works (Work Number 9A).</p>	
RR-5075.03	<p>Statkraft's principal issues of concern are as follows:</p> <p>The Project could materially prejudice the delivery of the Statkraft Project. It is not clear at this stage whether co-existence of the projects is possible. To the extent that it is, the permanent acquisition of land and operational stage rights to access and maintain cable infrastructure must have the potential to reduce the capacity of the Statkraft</p>	<p>The Applicant would welcome further engagement with Statkraft in relation to the proposed Greener Grid project and to understand its stage of development and likely timelines. No further correspondence has been received aside from this Relevant Representation, however, the Applicant is seeking further engagement in order to understand project interfaces.</p> <p>The detailed explanation behind the connection location for the Proposed Project, the assessment of feasible alternatives that were</p>

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	<p>Project or its operational efficiency. That would have implications for decarbonisation objectives that the Statkraft Project would serve to support.</p> <p>To the extent that the projects could co-exist, the intrusive nature of the construction works to deliver the Project at this location, with associated rights of compulsory acquisition and temporary use sought, must have significant implications for the timely delivery of the Statkraft Project, were it to secure consent and exercise its Option.</p> <p>Statkraft has had no engagement to date with the Applicant. Accordingly there have been no discussions held in order to consider how the Order Limits could be limited so as not to cause a detrimental impact on the Statkraft Project (and in turn reduce or remove the requirement for powers of compulsory acquisition and temporary use over the Option Land).</p> <p>It is not clear what alternative sites have been considered to avoid development over the Option Land, and the use of related compulsory acquisition powers.</p> <p>Statkraft reserve the right to add to, and expand upon, the points set out above should that be necessary in due course</p>	<p>considered, how the Applicant has coordinated with other projects and a complete project description is contained in:</p> <p>Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];</p> <p>Application Document 8.3 Strategic Options Report (October 2023) [APP-370];</p> <p>Application Document 7.2 Strategic Options Back Check Report [APP-320];</p> <p>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044];</p> <p>Application Document 7.10 Coordination Document [APP-363];</p> <p>and</p> <p>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003].</p>
RR-5075.04	<p>Statkraft Position</p> <p>In summary, Statkraft requires satisfactory agreement with the Applicant that:</p>	<p>As previously stated, the Applicant would welcome further engagement with Statkraft to seek agreement on the terms for land and asset protection and their inclusion in the draft DCO.</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>regulates the manner in which rights over the Option Land are granted and the relevant works are carried out; and</p> <p>confirms that compulsory acquisition powers will not be exercised in relation to the Option Land.</p> <p>Statkraft would welcome the opportunity for early and meaningful engagement with the Applicant to explore a mutually beneficial route to delivery of both projects.</p>	

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