

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.138 Applicant's Written Response to Open Floor Hearing 3

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1. About this Document

1.1 Introduction

- 1.1.1 This document provides a written response to the oral submissions made by Interested Parties at Open Floor Hearing 3, held in London Tuesday 24 March 2026, in relation to the Sea Link Project ('the Proposed Project').
- 1.1.2 The Applicant has summarised the topics, points and queries raised by Interested Parties at Open Floor Hearing 3. A detailed response against each topic has been provided.
- 1.1.3 The Applicant did not provide any oral submissions during Open Floor Hearing 3 but did attend all hearing sessions.

1.2 Scope of this Document

- 1.2.1 While the Applicant was not asked to provide any responses to submissions, the Applicant attended all of the Open Floor Hearings (OFH) to listen to the representations made by the interested parties.
- 1.2.2 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 [EV7-003 – EV7-010] to ensure accuracy and full understanding of the points raised.

1.3 Approach and Methodology

- 1.3.1 In responding to the submissions made at the OFH3, the Applicant has adopted a topic-based thematic approach.
- 1.3.2 All representations 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.

1.4 Topics Raised in Oral Submissions

- 1.4.1 Oral and written submissions have been categorised under the following themes:
- Pegwell Bay Hoverport
 - Kiln Lane / Friston substation
 - Benhall Railway Bridge
 - Cultural Heritage and Archaeology
 - Alternatives

- General project
- Traffic and transport
- Socio-economics/local economy
- Design
- National security
- Tourism
- Ecology and biodiversity
- Mental health and wellbeing
- Converter station sites
- Pegwell Bay
- Landscape
- Cumulative effects of multiple energy projects.

2. Applicant's responses to specific points raised in OFH3

2.1.1 The table below comprises the Applicant's responses to specific points raised in the OFH3.

Table 2.1 Applicant's Response to OFH3

Topic	Applicant's Response
Pegwell Bay Hoverport	
Speakers expressed concerns that the former Pegwell Hoverport site will be used as an area in which to store aggregate that risks becoming a source of contamination for marine and terrestrial habitats.	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.
Some speakers stated their belief that the Hoverport is being compulsorily acquired by the Applicant.	The former hoverport, including access to it (Plots 3/97, 3/97a, 3/90, 3/111, 3/112, 5/33, 5/45 and 5/47), is required for permanent access to the intertidal mudflats for both construction and maintenance of the cable. This does not constitute acquisition or exclusive possession and will not materially impact any other users of this area.
Speakers reiterated concerns raised in previous OFHs over the potential impact of heavy machinery and plant on the Hoverport site. Since the site has experienced a degree of natural regeneration, concerns were expressed about the breaking up of surface material (made from colliery spoil) under the weight of vehicle movements, resulting in contamination and environmental pollution.	<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. The risk and impact assessments that National Grid has undertaken for the DCO application recognise the potential for a level of contamination, and in the context that the proposed use for the Hoverport is solely for access.</p> <p>The Applicant recognises the importance of ensuring that the hoverport hard standing is suitable for the limited construction and maintenance access proposed. The Applicant will include the Hoverport in the highway condition surveys outlined within section 7.4.7 of Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent (CTMTP) [APP-338]. This assessment is a standard precautionary measure and will ensure that access can be undertaken without giving rise to structural risk.</p> <p>In line with good practice, the Applicant's environmental risk and impact assessments have taken a precautionary approach and recognised the potential for contamination within the hoverport area.</p> <p>Importantly, the use of the hoverport is strictly limited to access across the existing hard standing. No intrusive works, ground disturbance, or new development are proposed at the hoverport as part of the change. This limited and non-intrusive use is itself an acknowledgement of the potential for underlying contamination, and the design has been developed to avoid triggering any release of such material.</p>
Some speakers expressed worries that no site-specific ecological surveys (specifically for reptiles) have been undertaken on the Hoverport, claiming that without a clear and complete baseline understanding of the area, it is not possible to assess environmental effects, apply the mitigation hierarchy, or give the ExA confidence that proposed works are not committing offences under environmental legislation. Some comments stated that these matters cannot be deferred to post-consent stages.	<p>The purpose of extending the Order Limits was to allow the potential relocation of the access route onto the intertidal mudflats. This is intended to give the Applicant more flexibility to avoid sensitive saltmarsh habitats in the upper intertidal area. This extension to the Order Limits allows for flexibility once surveys are complete to identify the route of least impact.</p> <p>The Applicant carried out consultation on the Change Request in October 2025. Natural England confirmed in their response that they are 'content with the change' to access at the former hoverport as 'this change is intended to avoid impacts to saltmarsh habitat, in line with our relevant representation comments'. The same environmental commitments as in the original application would apply to the changed application.</p> <p>The Applicant has submitted photographs into the Examination in response to the ExA first written questions, which clearly show open unvegetated hardstanding routes. Having walked the site, the Applicant is confident that sufficiently open and unvegetated routes exist.</p> <p>The Applicant does not intend to traverse habitat within which reptiles may be found (restricting access to open unvegetated hardstanding). Therefore, a reptile survey of the adjacent habitats, even if it confirmed the presence of reptiles, would not affect the approach to using the site for access. As discussed in ISH2 reptiles may spend short periods of time basking on hardstanding but because they are exposed to predators will spend little time there and will depart quickly as soon as vehicles approach. The Applicant will also put measures in place to ensure existing areas of hardstanding are not collapsed by vehicle movements (as this</p>

Topic	Applicant's Response
	<p>would be a health and safety concern aside from environmental considerations). The Applicant therefore does not see a necessity for reptile surveys.</p> <p>As is clear from the ground-level photographs that have been submitted into the Examination, there would be no requirement for tracking over ruderal habitats. The Applicant has already committed in the REAC (measure B66) to pre-construction botanical survey. This will identify areas of habitat suitable for larval foodplants or other ecological receptors to be avoided.</p>
<p>Concern that water sources will be at risk of contamination as a result of drilling, earthworks and laying of gravel that is not native to the area.</p>	<p>With regard to the pollution potential of runoff from the Proposed Project during both its construction and operation, a suite of Sustainable Drainage measures would be in place to capture the first flush, as well as all flows generated during rainstorms up to and including the 1 in 100 (1% annual chance) event. The SuDS will attenuate flows and provide for treatment, for example, settling suspended sediments and associated contaminants, prior to runoff being released into the surrounding water environment.</p>
<p>The majority of speakers who commented about the proposed use of the Hoverport during the construction phases raised concerns about the perceived loss of access, citing the area as being an important and well-established recreational resource catering for a range of interests and users, a matter that some speakers claimed the Applicant has failed to acknowledge.</p>	<p>The proposed change does not alter the way that any PRow, including PRow TR15 and TR33, are to be crossed and managed on Pegwell Road on the approach to the Hoverport and so there is no change to the assessed impact on these PRow. Pedestrian access through the Hoverport, where it interacts with the access route for the Proposed Project once this is in use, will be appropriately managed to ensure safe continued access through the works area, with barriers and crossing points implemented as required. Given the limited and localised nature of the proposed changes to the Order Limits and because the proposed change does not alter the nature and frequency of the access required through the Hoverport, the assessment findings remain the same, and there would be no new or different likely significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change. There will be no significant effects on tourism assets arising from construction of the Kent Onshore Scheme. Given that the change relates to the same vehicles travelling over a slightly different part of the hoverport, there would be no change to the assessment as a result of Change 1. The impacts to tourism and local businesses are considered within Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-057]. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>Pegwell Bay Country Park borders the landfall section of the Kent Onshore Scheme to the south, however the proposed changes to the Order Limits and internal access road near the foreshore would not result in any changes with respect to socio-economics, recreation and tourism. Pegwell Bay Country Park is identified as an open space receptor with potential to be impacted within the ES chapter. This receptor was therefore assessed and it was concluded that the Proposed Project would not give rise to significant adverse effects from a socioeconomics, recreation and tourism perspective.</p>
<p>Kiln Lane / Friston substation</p>	
<p>Concerns were raised by some speakers over the increasing size of the substation at Kiln Lane to accommodate further projects and the process by which additional grid connections are approved, with some speakers asserting that the substation may be extended in the future through less transparent/back door approaches. It was suggested that a maximum footprint for the substation should be secured</p>	<p>The Applicant is not seeking to use the Sea Link application to increase the size of the substation in comparison to that already consented under the SPR consents. The area for Kiln Lane (Friston) substation was smaller on the Sea Link Works Plans at the point of submission than the SPR Works Plans because the decision has now been taken to proceed with a Gas Insulated Switchgear (GIS) substation, which requires a smaller footprint than the Air Insulated Switchgear (AIS) substation also considered by SPR. However, given that the SPR consent grants powers to develop a GIS substation anywhere within a works area sized to accommodate the larger AIS substation, there remained a possibility that the GIS substation developed pursuant to the SPR consents would not align with the location of the smaller GIS substation limits of deviation shown in the Sea Link Works Plans. This possibility has materialised and the slight difference in location for the substation across the two projects is leading to challenges in collaboration, so the Applicant altered the Sea Link Works Plans to align with those approved for the SPR application. This enables more flexibility in the location of the Friston GIS substation to be consistent with the SPR plans; but would not increase the size of the substation or suggest that an AIS substation is being considered. This proposed change is explained in the Sea Link Change Notification submitted on 16 September 2025 [AS-138].</p> <p>The Applicant does not consider it necessary to secure the maximum footprint of the substation because it is considered flexibility is already secured as far as necessary by existing plans and commitments. However, given the concerns raised that National Grid is intentionally not securing the footprint in order to build a larger substation, and the fact that in reality the substation is being designed to the maximum footprint in the SPR consents, the Applicant has agreed to secure the footprint of the substation. The footprint has therefore been restricted to 16,800m² in Article 5 of the draft DCO for Sea Link. This reflects the same footprint secured in Requirement 12 of the SPR DCOs.</p> <p>It is often more economic and efficient to connect new developments into existing substations than to construct new substations and connecting to existing substations also often has a lesser environmental impact. It is therefore possible that the substation could cater for future developments, either in its proposed footprint or with extensions. However, these extensions would be subject to future</p>

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	consents and any impact would be appropriately considered at the time of any future proposal. The Sea Link project does not extend the substation beyond that already consented by SPR.
One speaker raised a number of points relating to the design of the Friston substation, arguing that there should be a height limit imposed, beyond which no roof-mounted equipment should be allowed on new structures. Furthermore, it was suggested that use of GIS should be defined, with further comments relating to the use of SF6 or alternative options.	The height of the substation is secured in Article 5 of the draft DCO, with Friston (Kiln Lane) substation limited to a height of 16 m above finished ground level. It is not considered necessary to restrict the height of roof-mounted equipment. The Applicant has selected equipment at Friston which is SF6 free GIS Switchgear.
A number of speakers indicated that the ExA should be careful to ensure that mitigation measures secured in the Scottish Power Renewables (SPR) EA1N and EA2 DCOs are transposed for Sea Link at the Friston / Kiln Lane substation.	The Applicant acknowledges the concerns of individuals who have engaged with the SPR DCO applications and with the Proposed Project, noting the overlaps and common issues between the projects. The Applicant has applied the mitigation hierarchy to address effects arising from the project and committed to enhancements where possible beyond mitigation. The Applicant has also sought to deliver mitigation in the same or a similar way to that committed to in the SPR consents at the site of Friston (Kiln Lane) substation where possible to reassure communities. However, it remains that the majority of the Sea Link and SPR projects comprise different developments, with different Order limits, needs cases, programmes, impacts and mitigation. It is therefore not necessary or possible to deliver all mitigation in a way that entirely consistent between the projects.
One speaker made a request for clarification on the proposed working hours at Friston/Kiln Lane Substation site.	Construction working hours for Work No. 1A (Suffolk overhead line works) and Work No. 1B (Friston Substation) are between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except where otherwise specified. This is secured in Requirement 7(7) in Schedule 3 of the draft DCO.
Benhall Railway Bridge	
A large number of speakers highlighted concerns over the proposed use of Benhall Railway Bridge for access—specifically seeking clarification on the structural integrity of the bridge and therefore its suitability for accommodating ALLs, the nature of works required (including potential use of an overbridge) and the duration of works.	Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101] submitted at Deadline 4 explains the proposed use of the Benhall Railway Bridge and the Applicant's feasibility assessment of different technical solutions to achieve this. The potential use of a mini bridge has been considered in detail by the Applicant and is technically feasible based on due diligence checks on loads applied to the plate sections that rest on the B1121 being able to surcharge downwards without detriment to the existing abutments/wingwalls. Further detail on the design of the solution can be developed following a structural assessment of the bridge following a structural survey which the Applicant is in the process of arranging. However, it is noted that this type of structural survey is not normally carried out prior to consent of a DCO application, partially because the condition of structures can change over time. The process for seeking approval in principle for use of the Benhall Railway Bridge is ongoing. The Applicant is engaging with both Network Rail and Suffolk County Council Highways to compile information that will inform further development of options for the bridge. While it is acknowledged that further structural assessment work needs to be undertaken, the bridge's current weight limit of 46 tonnes, is suitable for almost all of the Applicant's construction traffic. It should be noted that the Applicant has committed to investigating the potential to deliver works to permanently bring the bridge back to standard. Should repairs be required, they would be required at some point with or without the Sea Link project, but if completed by the Applicant could be carried out more rapidly and through separate finances rather than being funded by the local highway authority. This is a potential additional benefit of the Sea Link project.
Some speakers raised concerns about potential noise impacts upon the residents of the Whitearch community, associated with requesting the installation of a noise barrier for the Residential Park. Further comments identified the potential for disturbance to local residents arising from nighttime operations on the railway, related to works increased use associated with construction.	The Applicant understands that concerns were raised by residents about the noise impacts of trains associated with Sizewell C on residents at Whitearch, particularly given the movements at night. The Applicant can confirm that the Sea Link project will not generate additional rail train movements and this impact is not relevant to Sea Link. Any works at Benhall Railway Bridge would occur within the highway (or Network Rail land beneath) and would not therefore be closer to Whitearch than the road itself. Works would be short in duration, occurring for a small number of weekends for the overbridge solution or a maximum of 28 days for a permanent repair. Access to the Whitearch community would be retained throughout any works at the bridge.

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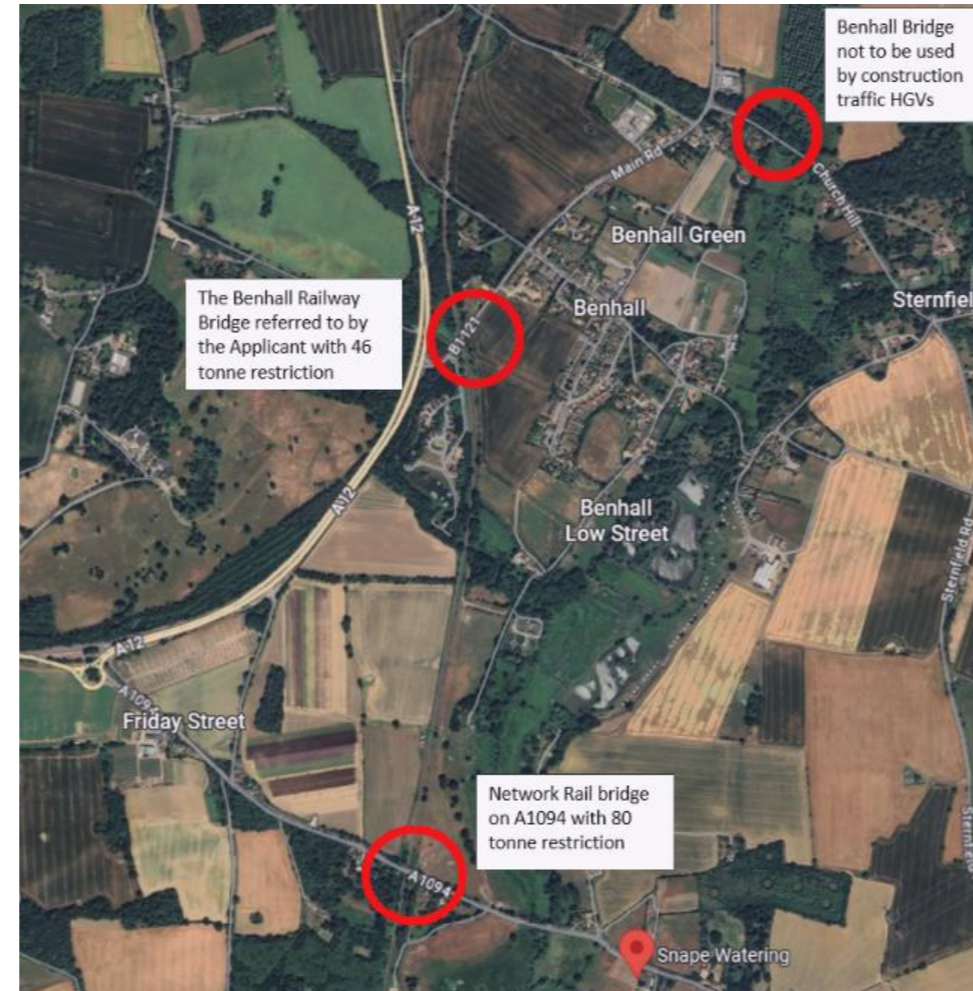
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One speaker sought specific clarification about the weight of transformers and ALLs that would need to cross the bridge, suggesting inconsistencies were present in application documents.

Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101] indicates that the heaviest and largest vehicles to be considered are the transformer delivery vehicles. Each transformer weighs 315 tonnes (shipping weight without oil). Each will be delivered on a girder trailer with 14 axles and each axle imposes a load of 14.1 tonnes. It is estimated that a maximum of 8 axles would act on the bridge at any one time resulting in a total load of approximately 113 tonnes which would exceed the 46-tonne current restriction.

It was apparent from some speakers that there was confusion about use of different bridges in this area, with some specifically citing Benhall Railway Bridge and others appearing to reference Snape Watering Bridge.

The Applicant recognises that locally and on Google Maps Benhall Bridge crosses the River Fromus on the B1121 Church Hill, the Applicant is not planning to use this bridge for any construction traffic HGVs. The bridge the Applicant refers to in all its documents is the B1121 Road over Rail Bridge at Main Road Benhall. The Applicant is also aware that the Network Rail owned bridge on the A1094 near Snape Watering also has a weight restriction of 80 tonnes applied to it by Network Rail. This limit does not impact on the majority of construction traffic required for the project.



One speaker claimed that the Applicant refused to participate in the SPR project examinations and, had they done so, would have been aware of the limitations of the Benhall Bridge.

This statement is incorrect. The Applicant did participate in the SPR project examinations, as evidenced by the submissions from National Grid Electricity Transmission into the Examinations available on the East Anglia Two Planning Inspectorate website. The current weight limit on Benhall Railway Bridge was not introduced until late 2024/ 25. The SPR Examinations concluded in Summer 2021, over three years before the current weight limit was placed on the bridge.

Cultural Heritage and Archaeology

One speaker raised concerns that the archaeology surveys in Suffolk were not adequate, given the late discovery of a significant neolithic henge feature.

The Applicant has taken a rigorous approach to archaeological assessment work for the Proposed Project, engaging with County Council Archaeologists and Historic England throughout the pre-application and examination stages. The geoarchaeological approach has been agreed with Historic England and consists of modelling based on the sampling undertaken as part of ground investigation

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works, including the Minster area in Kent and the Fromus Valley in Suffolk. This is designed to identify deposits that may require further investigation, and these matters are addressed in the Overarching Written Scheme of Investigation (OWSI). While some archaeological work would be undertaken post consent, there is an agreed process for continued engagement with Historic England and the two county councils. Should any new findings emerge, the Applicant stated that it would be possible to identify and secure appropriate mitigation, supported by a robust mitigation strategy.

Requirement 14 of Application Document 3.1 (H) draft Development Consent Order **[REP5-005]** obliges the preparation and approval of the WSIs and sets out how archaeological matters will be addressed.

The feature that was first thought to be a neolithic henge, on further investigation was shown to be a lower value partial enclosure. Further detail is provided in section 2.4 of Application Document 9.76.2 Change Application Summary Report **[CR1-052]**.

It remains possible on any project for archaeological discoveries to be made prior to or following consent of an application, archaeological surveys cannot fully rule out this risk, but the surveys undertaken by the Applicant prior to submission of the application are considered to be robust and appropriate to inform the Environmental Impact Assessment. It is common for trial trenching along underground cable routes to be carried out post consent and a find during trial trenching does not call into question the scope of surveys prior to submission of an application.

Some speakers from Kent expressed concerns about the potential impacts of construction activities on heritage-based tourist attractions, such as the Hugin Viking ship, the Viking Ship cafe and sites of historic significance.

Similar concerns were raised in OFH2. While the Applicant acknowledges these concerns, it would seek to reiterate the position that 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 routeing 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.

As stated within the Cultural Heritage 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.

While the concerns about impacts upon local businesses are also acknowledged, a complete assessment of socio-economics effects has been undertaken. This is set out in Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism **[REP1A-007]**. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.

In terms of the impact on visitors to the Viking ship and café, it should be noted that works at the Kent landfall location to the south of the café would occur over two Spring/ Summer seasons; the first period for the installation of four horizontal directional drilling pits and the second for the cable works. During the rest of the construction period significant works are not proposed at this location. During the two construction periods, there would be a maximum of 40 vehicle movements per day at the beach, generally vehicles moving onto the beach as the tide recedes and back at high tide (see section 5.2 of **[REP4-229]**). The noise effects have been assessed with negligible or no effects predicted (see Figure 6.4.3.9.2 and 6.4.3.9.4 in **[AS-141]**). The works are therefore not considered likely to have effects that would significantly affect people wanting to visit the Viking ship or café.

In terms of specific concerns raised about the Viking Ship café, the Applicant would also note that the construction workers would provide a potential additional market for the café and the Applicant is not intending to set up any rival catering facilities that would compete with the café. The Applicant's experience of this type of works is that they can be of interest to local people and visitors in themselves; and may act as an attractor rather than a detractor for visitors.

Alternatives

Some speakers alleged that the Applicant's assessment of reasonable alternative options for terrestrial elements in both Suffolk and Kent was not sufficiently clear. It was suggested that the presentation of alternatives and backchecks was not adequate.

The urgent need for the delivery of Sea Link and the specific requirements of the network reinforcement it is providing has informed the parameters of reasonable alternatives. 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]**.

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 explained the proposals and the underlying rationale, based on the information that was available at that time and was of sufficient detail to enable local residents and other stakeholders to provide

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	<p>informed feedback on the emerging scheme. 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>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>A number of speakers from the Suffolk area stated their preference for use of the alternative northern access route to the Saxmundham Converter Station site, as proposed by Suffolk County Council, or making use of Leiston airfield.</p>	<p>The Applicant provided a comprehensive response to Suffolk County Council's proposed northern access route at Deadline 5 (see Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]).</p> <p>The Applicant fundamentally does not accept that there has been a lack of consideration of alternate access routes to Saxmundham Converter Station or that the Applicant has not adequately investigated alternate access routes to Saxmundham Converter Station, having undertaken a reasonable and proportionate assessment of alternative access routes, and reached a decision based on a suitable evidence base that considered reasonable alternatives, as set out in the Alternatives chapter of the ES [APP-044].</p>
<p>General project</p>	
<p>One speaker claimed that the number of inaccuracies resulting in amendments to DCO application documents and the change request application suggest that the application was not ready for submission.</p>	<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 was 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. 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>In seeking to add weight to their concerns about the potential cumulative effects of the Proposed Project, one speaker made reference to comments from the Crown Estate and requested an update on the Applicant's negotiations with Crown estate and progress of discussions</p>	<p>In response to a question from the Examining Authority the Applicant presented an update on the status of its negotiations with the Crown Estate, stating that commercial negotiations are advancing well following an all-parties meeting on 25 February 2026 and agreement on heads of terms is expected imminently.</p>
<p>One speaker made specific reference to the potential impacts of development upon the development and wellbeing of children, querying whether the Children's Act 2014 had been considered in the development of the project.</p>	<p>The Proposed Project has adopted the Rochdale Envelope approach in accordance with Planning Inspectorate's Advice Note (The Planning Inspectorate, 2018). This involves specifying parameter ranges, including details of the maximum, and where relevant minimum, size (footprint, width, height), technology, and locations of the different elements of the Proposed Project where flexibility needs to be retained. Use of the Rochdale Envelope ensures that the likely worst case scenario is presented in the assessment of potential environmental effects from the Proposed Project.</p> <p>The Children's Act 2014 has not been considered directly in the preparation of the Proposed Project's DCO application. However, planning policy is developed alongside the Strategic Environmental Assessment (SEA) process, which is designed to embed wider environmental and sustainability objectives into policy-making from an early stage. SEA identifies relevant international, national and local objectives and uses them to shape the scope of assessment and test reasonable alternatives and draft policies. Through this</p>

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	<p>iterative process, SEA informs policy choices, mitigation measures and refinements, ensuring that planning policy aligns with broader policy priorities and the principles of sustainable development in a transparent and proportionate manner.</p> <p>Subsequently, as the Proposed Project is prepared in accordance with energy-related National Policy Statements, relevant legislation and policy considerations are embedded within the criteria that have informed the development of the scheme and are inherent in the decision-making process. Assessment of the Proposed Project against the relevant planning policies is set out in Application Document 7.1 (C) Planning Statement [AS-057].</p>
<p>Some speakers from the Kent area raised concerns that the process is confusing and difficult for local residents to understand and navigate, highlighting the sheer number of documents making it difficult to keep up to date with changes to the proposals and responses to matters raised in earlier hearings.</p>	<p>Development Consent Orders are complex because they combine planning permission and multiple other statutory consents into a single, tightly timetabled process that must reconcile national policy, detailed environmental assessment, extensive consultation and the interests of many parties for large-scale infrastructure projects.</p> <p>The Applicant acknowledges that this is a complex process that many may find difficult to navigate, however, the reason for so many updates to documents during DCO examinations is because the process is iterative and evidence led, requiring applicants to respond formally to written questions, representations from multiple parties, emerging areas of agreement or disagreement, and Examining Authority requests for clarification or refinement designed to resolve issues transparently before a recommendation is made. The number of documents submitted into the Examination is partially due to the number of representations and submissions from Interested Parties.</p>
<p>Some speakers argued that the Applicant has not engaged adequately with local residents and suggested that more meaningful engagement would have resulted in more effective mitigation measures.</p>	<p>The Applicant has widely engaged with interested parties regarding the Proposed Project. 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>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>The Applicant will continue to engage with various parties over the remainder of the examination process.</p>
<p>One speaker claimed that the Sea Link Project is constantly increasing in size.</p>	<p>The Sea Link project has not increased in size. The changes to the application in Change Request 1 provided flexibility rather than increasing the size of the project; it provided flexibility to route a cable around a heritage feature, to avoid areas of saltmarsh habitat, to move Friston substation to the location proposed by SPR, to implement a bridge repair (instead of only having an overbridge solution) and to move the location of a new hedge. None of these changes increased the size of the project and no other change requests have been submitted. However, the changes did enable the project to further reduce adverse impacts and deliver additional benefits.</p>
<p>Some speakers asserted that the Applicant is prioritising profit over environmental impacts.</p>	<p>As outlined in response to similar comments at OFH1, the Proposed Project is promoted to meet statutory duties and national policy objectives for electricity transmission. 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] 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>Funding and cost assessments are set out in Application Document 4.1 (C) Funding Statement [REP04-011] and Application Document 7.2 Strategic Options Back Check Report [APP-320]. The Proposed Project is subject to regulatory oversight and funding is secured via Ofgem's framework.</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>Traffic and transport</p>	
<p>Concerns were raised by a large number of speakers about numbers of HGVs on the local road network and safety concerns arising due to the unsuitability of local roads to accommodate these types of vehicles—</p>	<p>Construction traffic effects in both Suffolk and Kent have been fully assessed for the peak construction phase and recognise community concerns, particularly in relation to driver delay, access to services and cumulative impacts. The assessments conclude that, based on receptor sensitivity and the small or negligible changes in traffic flows, construction traffic is not expected to result in significant effects on the highway network.</p>

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associated with the Proposed Project in isolation and cumulatively with other developments.

In Suffolk, construction traffic has been carefully routed to minimise impacts on local communities, with approximately 97% of trips using strategic routes including the A12, A1094 and B1121, and constrained villages such as Friston, Aldringham, Sternfield and Knodishall largely avoided. The majority of construction traffic will access the site via a new haul road, significantly reducing HGV movements on the public highway. Limited movements required for specific activities will be tightly controlled, with mitigation secured through the Outline Construction Traffic Management and Travel Plan and the Public Rights of Way Management Plan, in consultation with Suffolk County Council.

In Kent, construction traffic routing has similarly been designed to minimise impacts, with assessments demonstrating no significant effects on the surrounding highway network, including through Minster and Cliffsend. No construction vehicles are forecast to pass through Minster during the peak construction phase, and any minor effects identified elsewhere are short-term and not significant. Mitigation measures will be secured through the Outline Construction Traffic Management and Travel Plan for Kent, ensuring impacts remain acceptable.

Some speakers made reference to the significant adverse impacts that were experienced across the local road network in Suffolk as a result of a recent closure of the A12—associated with another major infrastructure project. This incident was claimed to highlight fragility of the local road network

Whilst noting that these issues relate to other projects, occurring well ahead of Sea Link's construction programme peak, the Applicant nonetheless acknowledges the disruption and inconvenience experienced by local residents during these events.

The Applicant held a further transport meeting with SCC Highways on 30 March 2026 when SCC confirmed that following the works, Friday Street (A12/ A1094 junction) had been opened that morning, and that Yoxford (A12/ B1122 junction) would be opened the day after on 31 March 2026. Therefore, whilst there will be ongoing landscaping works at these junctions into the summer of 2026, there will be no overlap between these specific junction works and the Suffolk Onshore Scheme. The improvements will increase the baseline capacity of the highway network, reducing existing levels of driver delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme, particularly at Friday Street (A12/ A1094 junction) which is one of the principal access routes from the A12.

The Applicant is aware that these roundabouts are associated with wider works being undertaken by Sizewell C (SZC), namely the Two Village Bypass and the Sizewell Link Road. The Two Village Bypass will largely be constructed offline with the exception of an additional new roundabout to be built on the A12 at the junction with Tinker Brook. These works are expected to be completed in 2026 and are therefore not anticipated to impact construction traffic associated with the Suffolk Onshore Scheme. The Sizewell Link Road is expected to be completed in 2027 and will be a 6.5km new road bypassing the local villages of Theberton and Middleton Moor, with new junctions at each end including a new roundabout on the A12. The Sizewell Link Road will be built largely offline to limit the impact on A12 traffic. The Proposed Project's Traffic Co-ordinator (secured within Application Document 7.5.1.1 (D) Construction Traffic Management and Travel Plan Suffolk [REP5-064]) will liaise with SZC on their programme so that the contractor is aware of any road closures of the A12 during final connection works of this roundabout. The additional junctions associated with the Sizewell Link Road are on the B1122 which is proposed as an Abnormal Indivisible Load (AIL) access route for the Suffolk Onshore Scheme. These AIL movements will be planned to align with SZC's programme, noting that the majority of these would not occur until after the 2027 completion date.

The Applicant is also aware of SCC's A12 Major Road Network (MRN) scheme on the A12 to south of study area. Whilst the A12 MRN scheme will partially overlap with the construction phase of the Suffolk Onshore Scheme, it is understood that these works will be planned by SCC and contractors to minimise A12 disruption e.g. overnight/ weekend works. The Proposed Project's Traffic Co-ordinator will liaise with SCC and other developers in the area to understand when the works are being carried out and to manage construction traffic accordingly.

Again, the above highway improvements will increase the baseline capacity of the highway network, reducing existing levels of driver delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme.

Lastly, the junction modelling outputs were shared with SCC Highways on 1 April 2026. This included junction modelling for the A12/ B1121 Main Road junction (to the south of Saxmundham) which includes details of driver delay for the A12 on the approaches to the B1121 Main Road. The junction modelling also includes a Sensitivity Test, to consider potentially higher baseline traffic flows at other times of the year. The Applicant's position with respect to further journey time analysis remains unchanged from the response to the Examining Authority's Second Written Question 2TT3 within Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135]. It will not be possible to utilise a Strategic Transport Model within the remaining timescales of Examination, nor is this considered necessary.

Clarification was sought by one speaker about the number of HGV movements forecast in Kent.

As mentioned during ISH3, there will be a daily maximum of 108 HGVs on the single busiest day of the construction programme in Kent, as shown within Table 7.26 of Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. The majority

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	<p>of HGVs associated with the Kent Onshore Scheme will not access Minster Marshes. Following further consultation with KCC Highways, a daily cap of ten HGV movements will be imposed on Marsh Farm Road, to minimise potential impacts of construction traffic on this part of the network (via access point K-BM04), as well as through Minster. A daily cap of ten HGV movements will also be imposed on Whitehouse Drove, to minimise potential impacts of construction traffic on this part of the network (via access point K-BM05). These localised daily HGV caps are secured within an updated version of Application Document 7.5.1.2 Outline CTMTP – Kent which has been submitted at Deadline 6.</p>
Socio-economic / local economy	
<p>Concerns were raised that there are no employment opportunities offered by the Project for local people in Kent, while there is concern over the potential impacts upon employment and existing businesses.</p>	<p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] presents 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. Where appropriate, receptors located beyond 500 m of the Kent Onshore Scheme have also been included in the assessment to allow for assessment flexibility. 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.</p> <p>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] indicates the project will create an estimated 50 net additional jobs per year during construction in Kent.</p> <p>In addition, a Skills, Supply Chain and Employment Plan (SSCEP) has been prepared to accompany the Application for a Development Consent and has been submitted at Deadline 6. The SSCEP sets out the likely economic benefits of the Proposed Project, and the context and characteristics of the local community and economy in which it is located. Alongside this, key skills, supply chain and employment challenges and opportunities are considered. It then identifies activities relating to the themes of Skills, Supply Chain and Employment which the Applicant proposes take forward post-consent. These activities will help local individuals and businesses access benefits associated with the Proposed Project.</p>
<p>A local business owner in Kent queried whether compensation would be provided for businesses that are adversely affected in Kent.</p>	<p>The Applicant will work closely with landowners and tenants to minimise disruption, agree accommodation works, and manage construction schedules. Compensation for disturbance will be considered on an evidenced basis, and landowners are encouraged to maintain records.</p>
<p>One speaker in Kent queried whether food and drink suppliers will be brought on site for construction workers?</p>	<p>Specific details around provision of facilities at construction sites will be determined by the appointed contractor. However, as described above, the Applicant can confirm that there is no intention to set up commercial catering facilities that would compete with existing cafes and restaurants.</p>
<p>One speaker raised concerns over potential impacts on leisure boat trips in Pegwell Bay area, for watching seals and other wildlife.</p>	<p>In direct response to concerns regarding activities such as boat trips and wildlife watching in Pegwell Bay, it is important to note that no evidence has been identified to indicate that these types of tourism activities would experience material disruption or decline as a result of the onshore works. While Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] is primarily a terrestrial assessment of tourism assets, it considered effects on tourism related businesses. There was assessed to be no significant effect on business assets, which includes tourism related businesses arising from the construction of the Kent Onshore Scheme and no mitigation will be required. However, through proactive collaboration the Applicant will also liaise with Kent County Council, Thanet District Council and relevant tourism organisations during construction to discuss how potential impacts on tourism within Kent could be minimised and benefits be maximised.</p> <p>This conclusion is supported by additional evidence submitted at Deadline 3 through Application Document 9.41 Visitor and Tourism Assessment Technical Notes – Kent [REP3-066]. This draws on experience from comparable NSIPs, including Sizewell C, Bramford to Twinstead, and East Anglia ONE North and TWO Offshore Windfarms. These projects applied comparable methodologies and consistently found that material impacts on tourism and visitor numbers were unlikely and confirm that while perception may indicate concern prior to construction, there is limited robust evidence to demonstrate that this leads to material adverse effects on visitor numbers, spending, or the wider tourism economy. This supports the conclusion in Application Document</p>

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	<p>6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] that no significant adverse effects on tourism are anticipated, including activities such as wildlife and boat-based recreation, are anticipated.</p> <p>At Pegwell Bay regular seal watching tours occur all year round (River Runner) with seals highly habituated to the presence of the boat as evidenced by no flight response observed in any seal, including of juveniles, at a distance of around 30-50 m away from large congregations of seals on the sandbanks at low tide and saltmarsh at high tide during project surveys (Application Document 6.3.4.4.A (B) Pegwell Bay Seal Survey Report [REP1-003]). Seals at Pegwell Bay are known to preferentially haul-out on the sandbanks and mudflats in the channel of the River Stour at low tide. They are, therefore, relatively sheltered from any noise or activities occurring in Pegwell Bay for long periods of time. Even at high tide, when there may be seals hauled-out on the saltmarsh, the potential for disturbance from Pegwell Bay is limited due to distance and background sounds from waves and wind. At such a distance away, (a minimum of 670 m from any Proposed Project activities), this region of the river is somewhat sheltered from and so project activities occurring in Pegwell Bay are not likely to cause seals to move away. Additionally, the seals are considered to be largely sheltered from visual effects resulting from construction activities occurring on the intertidal area of Pegwell Bay, particularly during and around low tide. This is due to the location of the hauled-out seals on the sandbanks and mudflats in the River Stour and therefore the distance between project activities and the haul-out site. Personnel and construction vehicles will be operating at a minimum distance of 670 m from the seal haul-out site in the River Stour (determined based on seal surveys undertaken in the River Stour in September to November 2024 and August 2025).</p>
Design	
<p>Speakers from Saxmundham commented on the scale of the Converter Station—in terms of height and footprint—comparing it to Wembley stadium and creating an imposing mass, making the external design a vitally important consideration of the application.</p> <p>Speakers also stated a desire to see inclusion of measures to reduce the height by sinking buildings below ground level and providing bunding to obscure the mass.</p>	<p>The Applicant considers the level of detail provided with regard to the design of the Converter Station is appropriate and proportionate for this stage of the DCO process, highlighting that National Policy Statement EN 1 (paragraph 4.7.6) and National Policy Statement EN-5 (paragraph 2.4.3) are clear that an applicant may have limited control over the physical appearance of electrical infrastructure; which must in the first instance be designed to operate safely and securely. This establishes the limits of what can be controlled by relevant planning authorities or other consultees during detailed design.</p> <p>The Applicant has invested significant time in design development, including appointing an architect from the outset to assist in understanding which design elements can be influenced and which are inherently constrained by engineering requirements. The Applicant has presented during the examination a diagram of the converter station layout alongside illustrative layout drawings, explaining the functions of different structures, along with the aspects (e.g. height) that are dictated by the equipment they house and clearance requirements between equipment and roof structures. Aspects such as colour, roofline profile, and architectural treatment can be controlled, however, the electrical equipment externally situated cannot be altered, meaning the Applicant's ability to modify external layouts is inherently limited.</p> <p>Application Document 7.11.1 (B) Design Approach Document – Suffolk (B) [REP1A-029] outlines design considerations for the Converter Station and illustrative visualisations have been provided in Application Document 9.14 Suffolk and Kent Illustrative Visualisations [REP1-296], which show how the converter station could realistically appear based on indicative layouts, and which comply with the Design Principles and Requirement 3 of the 3.1 (H) draft Development Consent Order [REP5-005]. These illustrations show more accurately what the converter station as proposed would look like, in comparison to the visualisations shown in other parts of the hearing that had shown the maximum parameters over the full limits of deviation. The visualisations show maximum parameters showing a scale of development significantly worse than what could be developed on the site, presenting a worse than worst case scenario, and should be used only to understand the maximum parameters.</p>
<p>Speakers in Kent criticised the Applicant's decision to build the Converter Station in a marsh.</p>	<p>As the Applicant has previously made clear, while it is recognised that the site of the proposed Converter Station and substation lies within an area that is informally referred to by local people and is shown on OS Maps over the general area as the 'Minster Marshes', 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. Instead, the proposed Converter Station and substation site is primarily located within drained and cultivable arable land that is in active use.</p> <p>Similar claims to those made in OFH3 were made in the submission of video evidence seeking to highlight the extent of the flooding on Minster Marshes on the area of the Converter Station build [REP4-146], asserting that the site is prone to groundwater flooding and the land is also referred to as a floodplain. However, the Applicant provided a comprehensive response in Application Document 9.99 Groundwater Flood Risk at the Minster Converter Station Site [REP5-122]. This document explained that the observed conditions were representative of a very sustained period of rainfall, between December 2025 and February 2026, combined with the poor infiltration</p>

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	properties of the shallow local soils and superficial geology—not driven by groundwater rising from the bedrock. All new areas of impermeable land cover as a result of the Proposed Project would be served by drainage infrastructure.
National Security	
<p>A number of speakers expressed concerns about the vulnerability of communities situated nearby new, large-scale energy generation and transmission infrastructure which could become targets in the event of war.</p> <p>Similarly, some speakers raised concerns at the potential risks associated with concentrating so much energy infrastructure in Suffolk.</p>	<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>
Tourism	
<p>Some speakers from Suffolk raised questions about compensation for losses that may be experienced, particularly by small/medium sized businesses that are dependent on tourism as a result of cumulative adverse effects from multiple major infrastructure projects.</p>	<p>The Applicant will work closely with landowners and tenants to minimise disruption, agree accommodation works, and manage construction schedules. Compensation for disturbance will be considered on an evidenced basis, and landowners are encouraged to maintain records.</p>
<p>One speaker in Suffolk expressed a desire to see the Applicant undertake assessments to gauge perceptions of visitors to the area—given the correlation between experience, perception and behaviour.</p>	<p>The Applicant acknowledges concerns regarding the absence of attitudinal surveys, however, it does not consider that undertaking such a survey would be necessary or proportionate, nor that it would materially alter the conclusions of the socio-economic assessment.</p> <p>Whilst attitudinal surveys can provide contextual insight, they have inherent methodological limitations when used to predict tourism impacts. There is the risk that survey design and question framing may introduce bias, for example through leading questions, which can influence respondents' perceptions and responses. More specifically, they rely on respondents indicating how they might behave in a hypothetical future scenario. Evidence gathered from other major infrastructure projects demonstrates that such stated intentions do not reliably translate into actual visitor behaviour once construction is underway. For example, Sizewell C identified limited empirical evidence of any reduction in visitor numbers or expenditure beyond normal year-to-year variation. In addition, monitoring of other major infrastructure projects has shown that initial concerns about visitor perception do not typically translate into measurable impacts on tourism activity. For example, at Hinkley Point C, over 90% of visitors reported that their experience was unaffected by construction, while tourism employment in Somerset was found to have increased during the construction period. A similar pattern was observed during the construction of Sizewell B, where tourism employment increased and fluctuations remained consistent with normal economic variation.</p> <p>This evidence base is brought together in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]. The findings confirm that while perception surveys may indicate concern prior to construction, there is limited robust evidence to demonstrate that this leads to material adverse effects on visitor numbers, spending, or the wider tourism economy. This supports the conclusion in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] that no significant adverse effects on tourism are anticipated.</p> <p>These comparator projects are considered appropriate and conservative benchmarks. These projects are substantially larger in scale than the Proposed Project and are located in environmentally and visually sensitive coastal areas with established visitor economies. By comparison, the Proposed Project is smaller in scale, with a shorter construction duration and a significantly smaller workforce.</p> <p>Attribution</p> <p>Suffolk has multiple infrastructure projects progressing concurrently which makes it extremely challenging to attribute any marginal changes in perception or behaviour to the Proposed Project in isolation. There is a significant possibility that Sizewell C impacts will be perceived as Sea Link impacts given the overlapping construction timescales and hence impacts would be overestimated. For this reason, the Applicant has placed greater weight on empirical evidence and observed outcomes from comparable projects, which it considers provide a more robust basis for assessment.</p>

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Ecology and Biodiversity	
<p>Concerns were raised that there is no buffer zone between the proposed infrastructure at the Converter Station site in Kent and the Sandwich Bay to Hacklinge Marshes SSSI.</p>	<p>There is approximately 20 metres between the proposed Minster Converter Station and the nearest part of the Sandwich Bay to Hacklinge Marshes SSSI and mitigation measures for the construction phase are set out in 9.84 (C) Register of Environmental Actions and Commitments (REAC) [REP5-115].</p> <p>Application Document 6.2.3.2 (F) Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity [REP5-017] provides a detailed assessment of impacts of the Proposed Project upon the SSSI. Whilst elsewhere the SSSI is crossed by trenchless technique, Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] sets out the main alternatives considered in relation to the Kent Onshore Scheme and the reasons behind the decision to cross the SSSI and to locate Minster Converter Station and Substation within Minster Marshes.</p>
<p>One speaker raised concerns in regard to the surveys and assessments related to bats, such as downgrading the habitat significance from national to regional, use of non-standard surveys, and proposed removal of important hedgerows (resulting in the loss of maternity roosts).</p>	<p>The bat survey programme was not designed to cover every individual hedgerow, as this would be logistically impracticable, unnecessary for characterising bat assemblages within the Order Limits, and inconsistent with standard practice for large infrastructure projects where most habitat impacts are temporary.</p> <p>Bat transect surveys are undertaken at specific times during the night and are intended to characterise bat populations and activity across defined areas, rather than to map activity along every hedgerow. It is common and accepted practice for some hedgerows not to be individually surveyed on large schemes. Despite this, the assessment is considered to have adequately characterised the importance of the area for bats, identifying locations where bat activity is most concentrated using habitat characteristics and vegetation structure. As a precautionary measure, all hedgerows are treated as potentially important for bats, regardless of whether they were individually surveyed.</p> <p>The Applicant cautioned against over-interpreting bat activity maps, which were not intended to indicate the relative importance of individual hedgerows.</p> <p>During Issue Specific Hearing 3 the Applicant responded to points raised regarding the valuation of the bat assemblage. The Applicant confirmed that the established methodology has been applied within the Environmental Statement to assess assemblage importance. That methodology does not take account of the level of activity of individual species, and therefore the Applicant has also reported the regional value of the assemblage to provide full context. The Applicant confirmed that, even if the assemblage were classified as being of national importance rather than regional importance, this would not alter the assessment of effects, the conclusions reached, or the mitigation proposed. The significance of effects would remain unchanged.</p>
<p>A large number of speakers in both Kent and Suffolk stated opposition to the Proposed Project on grounds of ecology and biodiversity impacts.</p>	<p>The Applicant provided comprehensive responses to similar concerns raised in 9.69 Applicant's Written Response to Open Floor Hearing 1 [REP2-031] and 9.71 Applicant's Written Response to Open Floor Hearing 2 [REP2-032].</p> <p>The assessment of ecological impacts (6.2.3.2 (F) Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity [REP5-017], 6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP4-025] and 6.6 (G) Habitats Regulations Assessment Report [REP5-036]) considers effects on protected sites and species. Mitigation measures are embedded to avoid or minimise impacts, and the assessment concludes that, with these measures, significant adverse effects are unlikely.</p>
Mental Health and Wellbeing	
<p>A number of speakers raised concerns about the effect of the Proposed Project on the mental health of local residents, with some suggesting that the mental health impacts have not been evaluated in a meaningful way. Reference was made to research by Public Health England regarding the mental health impacts of development and HS2 providing for mental health monitoring.</p>	<p>The potential for mental health effects from the Proposed Project have been assessed within Chapter 11 Health and Wellbeing [APP058] in accordance with the IEMA Guide to Effective Scoping of Human Health in EIA (2022). Mental health is considered through assessment of relevant health determinants, including access to services and open space, transport and connectivity, social cohesion, and environmental factors such as noise, visual amenity and disruption. Concerns raised by stakeholders were considered, and the Applicant reviewed the academic study 'Wellbeing Impact Study of High-Speed 2 and concluded that its themes are already captured within the adopted methodology and did not require changes to the assessment approach. The assessment concludes that no significant adverse effects on mental health are anticipated. Similarly, no cumulative significant adverse effects on health and wellbeing are anticipated. Embedded mitigation measures and controls, including working hours and construction traffic management, further reduce potential impacts, and are set out within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP5-115]. No further amendments to the DCO application are considered necessary.</p> <p>The Applicant notes that many speakers in Suffolk discussed the impact of Sizewell C on their mental health and wellbeing. Whilst the Applicant empathises with the speakers, the development of Sea Link, which is predominantly an undersea and underground cable, is not comparable to the construction or operation of a nuclear power station.</p>

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Speakers in Suffolk highlighted concerns relating to the cumulative effects of multiple NSIPs having significant mental health impacts upon local residents, claiming the Applicant's approach to cumulative effects is inadequate.	<p>The Applicant has set out detailed response in relation to minimising health and wellbeing impacts within Application Document 9.136 Applicant's Responses to Third Written Questions. Please refer to 3HW3.</p> <p>The assessment of cumulative effects has been undertaken and not identified significant impacts; nor has any robust evidence been presented by Interested Parties that would suggest that Sea Link alone or in combination with other projects would result in significant adverse effects.</p> <p>The Applicant advised at ISH3 that it does not consider monitoring to be an effective or proportionate response, given the significant background activity associated with other major projects (such as Sizewell C), which would make it difficult to isolate effects attributable to the Proposed Development. Instead, the Applicant outlined a package of engagement and support measures, including the appointment of a community liaison officer trained in mental health awareness, provision of one-to-one community surgeries, and the use of neutral spaces where questions and concerns can be raised. The Applicant also confirmed the provision of a dedicated community contact telephone line and email address to ensure that enquiries can be responded to quickly and personally.</p> <p>The Applicant further confirmed that it will attend and contribute to the relevant health and wellbeing working group established for SZC, noting that this approach has been agreed in principle. The Applicant reiterated that it considers this engagement led approach to be more productive than formal monitoring arrangements.</p>
Converter Station Sites	
Speakers in Suffolk queried the size of the Converter Station (including the proposed LionLink site), seeking confirmation of maximum parameters and more detailed visualisations.	<p>The height of the Suffolk Converter station is limited by the parameters table in Article 5 of the draft DCO, which limits the height to 26 metres above existing ground level. Application Document 2.13 Design and Layout Plans [APP-037] includes a plan entitled 'Suffolk: Typical Suffolk Converter Station- Elevation Drawing'. This shows the heights of different structures within a converter station, showing that whilst the valve hall is significant in height, the majority of equipment on the site is significant lower in height, with most outdoor equipment being no greater than 16 metres in height. As shown in the Typical Suffolk Converter Station Layout Plan in the same plan set, the larger buildings comprise less than half the area of a converter station.</p> <p>The area in which the converter station can be developed is limited by the area shown for Work No. 3B and its associated limits of deviation on the Works Plans (Sheet 1 of 7) [REP4-006]; the location of the converter station is fairly fixed within the site, with modest limits of deviation included.</p> <p>The size of the Converter Station site has been designed in accordance with the operational requirements of the infrastructure it will need to accommodate.</p> <p>Illustrative visualisations have been provided in Application Document 9.14 Suffolk and Kent Illustrative Visualisations [REP1-296], which show how the converter station could realistically appear based on indicative layouts, and which comply with the Design Principles and Requirement 3 of the 3.1 (H) draft Development Consent Order [REP5-005]. These illustrations show more accurately what the converter station as proposed would look like, in comparison to the visualisations shown in other parts of the hearing that had shown the maximum parameters over the full limits of deviation. The visualisations show maximum parameters showing a scale of development significantly worse than what could be developed on the site, presenting a worse than worst case scenario, and should be used only to understand the maximum parameters.</p>
Some speakers in Suffolk raised concerns about the environmental impacts of the access road crossing the River Fromus, advocating the alternative northern access route to avoid this.	<p>The potential impacts of the River Fromus crossing have been carefully considered.</p> <p>The landscape and visual effects are summarised within Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-23] and a detailed assessment provided within the landscape assessment appendix Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The River Fromus bridge would not affect the rural skyline as the bridge would be contained within the River Fromus valley and there would be no location from which the bridge would appear against the skyline.</p> <p>Likewise, whilst the proposed Fromus bridge is present within the former parkland setting of Hurts Hall, and landscape setting of the Church of St John the Baptist, and this is assessed as having an impact through change to their settings at Year 1 of Operation, this impact is not considered to be due to it dominating the skyline. As indicated in Viewpoint 2 of Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209], the bridge would be contained within the River Fromus valley and there would be no location from which the bridge would appear against the skyline or otherwise dominating Hurts Hall or the Church of St John the Baptist.</p>

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	<p>The proposed bridge crossing of the River Fromus has been subject to a detailed assessment of potential effects upon the river itself, reported in Application document 6.8 Flood Risk Assessment [APP-292]. The design of the proposed crossing is such that the channel and banks of the river would be clear spanned, avoiding any physical impacts and changes on the flow regime.</p> <p>With regard to the proposed alternative northern access route, the Applicant provided a comprehensive response to Suffolk County Council's proposal at Deadline 5 (see Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]). The Applicant has undertaken a reasonable and proportionate assessment of alternative access routes and reached a decision based on a suitable evidence base that considered reasonable alternatives, as set out in the Alternatives chapter of the ES [APP-044]. The Applicant considers that the northern route would result in greater adverse impacts than the one selected and is not a sensible alternative.</p>
Pegwell Bay	
<p>An assertion was made that the Proposed Project would deposit plastics and synthetic materials in the sea at Pegwell Bay, and that there has been no assessment of the impact on this on the environment.</p>	<p>This is not true. The construction programme for the Proposed Project will be subject to strict measures designed to safeguard the marine and terrestrial environments from avoidable adverse effects set out in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP5-115] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [REP4-068].</p>
Landscape	
<p>Speakers raised concerns about the visual impacts of proposals</p>	<p>The effects of the Proposed Project on landscape and visual receptors in Kent have been considered in detail in Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. Details regarding the embedded mitigation should be referred to within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP5-115] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [REP4-068]. Following the implementation of the embedded mitigation measures it is considered that the remaining significant residual adverse effects at year 15 would be limited to four representative viewpoints (viewpoints 4, 5, 6 and 11) in close proximity to the north and north west of Minster Converter Station and Minster Substation and no significant residual adverse effects at year 15 on the assessed landscape or seascape receptors.</p> <p>The effects of the Proposed Project on ecology, landscape, recreation and amenity in Suffolk have been comprehensively assessed in detail in Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-23], with mitigation secured through the Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-066]. With these measures in place, no significant long-term adverse residual effects are anticipated, and the project would deliver a net increase in habitat for most ecological receptors.</p> <p>Landscape and visual effects, including impacts on designated landscapes such as the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast, have been assessed taking account of receptor sensitivity and magnitude of change. At year 15 of operation, when mitigation planting is assumed to be mature, the only residual landscape effect would be on Landscape Character Area L1 (Heveningham and Knodishall Estate Claylands), where the Saxmundham Converter Station would remain a noticeable change to the area's rural character. No significant adverse residual effects are identified for other landscape or seascape receptors or designated landscapes.</p> <p>Socio-economic, recreation and tourism effects have also been assessed. No significant effects are identified on open spaces, visitor attractions, or tourism assets, and no mitigation is required. Potential amenity impacts on nearby residents and users of community facilities arising from construction activities have been assessed within the Health and Wellbeing chapter, which concludes that no significant adverse effects are anticipated.</p> <p>Public Rights of Way and recreational routes have been assessed with regard to user sensitivity and potential disruption. Embedded mitigation, including route diversions, temporary closures and management measures, is proposed. With these measures in place, no significant socio-economic, recreation or tourism effects are expected to arise from the Kent and Suffolk Onshore Schemes.</p>
<p>Speakers raised concerns about the impact of the scheme and proposed lighting impacts on the Dark skies designation.</p>	<p>Application Document 9.84 (C) Register of Environmental Actions and Commitments (REAC) [REP5-115] includes controls on lighting during construction and operation to be of the lowest levels necessary to safely perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and habitats and designated conservation sites.</p>

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Some speakers raised concerns about the impact of the construction activities on tranquillity of the surrounding rural areas.	<p>The key landscape characteristics of Pegwell Bay include long seaward views, tranquillity and a sense of remoteness. The effects of the Kent Onshore Scheme on landscape character and visual amenity are assessed within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and supporting appendices.</p> <p>During construction, temporary direct effects on Pegwell Bay would arise from cable-laying vessels within the bay and construction access in the northern part of the area, including the former hoverport site. These effects are assessed as negligible in significance and were scoped out of the operational assessment, as operational effects would be limited to a short section of monitoring access with occasional use.</p> <p>Visual effects have been assessed for a range of receptors, including residents, visitors and users of coastal recreational routes. For recreational users at Pegwell Bay Country Park, a receptor of very high sensitivity, the Project would result in a small magnitude of change and a minor adverse, non-significant effect during construction, reducing to negligible adverse at operation. For residential receptors on the south-western edge of Ramsgate, the effect would be minor adverse and not significant during both construction and operation. Trenchless installation at the landfall would minimise surface disturbance and reduce visual effects.</p> <p>The Proposed Project incorporates measures to control noise and vibration during construction, as set out in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP5-115].</p> <p>Similarly, in Suffolk, Consideration of noise and vibration has also informed landscape value judgements relating to tranquillity in Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-23]. The effects on landscape character, including tranquillity, are detailed in Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097].</p>
Cumulative Effects of Multiple Energy Projects	
Lack of coordination between projects	<p>While concerns about strategic coordination are noted, the Proposed Project's acceptance by the Secretary of State as nationally significant infrastructure and its designation as a Critical National Priority (CNP) and Accelerated Strategic Transmission Investment (ASTI) project (as introduced by Ofgem) underlines its importance., The Applicant is committed to coordinating consenting and delivery with other projects where opportunities are available, including the colocation of infrastructure, however, it is essential that Sea Link is delivered on time. NPS EN-1, para 3.3.66 states that the security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.</p> <p>Information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how the Applicant has coordinated with other projects and a complete project description is contained in:</p> <ul style="list-style-type: none"> • Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]; • Application Document 8.3 Strategic Options Report (October 2023) [APP-370]; • Application Document 7.2 Strategic Options Back Check Report [APP-320]; • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]; • Application Document 7.13 Coordination Document [APP-363]; and • Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. <p>In addition, it is noted that LionLink has pushed its next round of consultation back which once again underlines the different timescales that each project is working to and the challenges associated with aligning project delivery.</p> <p>In addition, the Applicant has committed to ongoing dialogue with other developers and the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination.</p>
A number of speakers raised concerns about the combined effects of traffic related to different projects under development in Suffolk, claiming that communities are being overwhelmed by NSIPs	<p>A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considered other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and Lion Link, and the potential cumulative impacts on the surrounding highway network including with respect to Severance, Driver Delay and Road Safety. The assessment concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments. The Applicant is committed to on-going engagement with other projects to identify potential opportunities for</p>

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coordination during project delivery and to minimise potential highway impacts, and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. During the evolution of the Proposed Project design, the Applicant has engaged with the relevant stakeholders in order to understand and address any issues of concern regarding the Proposed Project and its impacts on emergency services. There are no likely significant effects identified on East of England Ambulance Service (EEAST) operations, service capacity and resources as a result of the Proposed Project. The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.1 (D) Outline Construction Traffic Management and Travel Plan – Suffolk **[REP5-065]**. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport **[APP-054]** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including in terms of Driver Delay), with the mitigation identified within Application Document 7.5.1.1 (D) Outline Construction Traffic Management and Travel Plan – Suffolk **[REP5-065]**.

A comprehensive suite of controls is secured through the Construction Traffic Management Plans for both Suffolk and Kent, including a combination of timing restrictions and targeted caps at specific locations. In ISH3 the Applicant explained that national policy does not support the imposition of restrictions or caps unless they are strictly necessary and justified. In this case the transport assessment demonstrates no significant traffic impacts and, as such, the imposition of blanket caps or additional regulatory controls is not considered justified. Rather, reliance is placed on the Construction Traffic Management Plans, which provide robust controls and restrictions appropriate to the scale of impact.

Application Document 9.84 (C) Register of Environmental Actions and Commitments (REAC) **[REP5-115]** provides a monitoring commitment (TT02), where monitored traffic levels exceeding those anticipated would trigger discussion with the relevant highway authority. Experience on other projects has demonstrated that fixed caps can be difficult to operate in practice, therefore this approach provides a degree of flexibility that differs materially from a fixed cap, allowing issues to be addressed proportionately and a dedicated traffic coordinator would be appointed to liaise with other projects and the highway authorities. This could result in adjustments to programme or activities to reduce vehicle movements at sensitive locations. The Applicant noted that.

In responding to comparisons drawn with other projects, the Applicant confirmed that national policy does not require the imposition of caps on all assessed traffic, and that any such measures must be justified by reference to capacity and impact. The Applicant emphasised that comparisons with other schemes are not directly transferrable and that the Proposed Development must be considered on its own merits. The Applicant confirmed that the controls and mitigation proposed are considered sufficient and proportionate.

Speakers in Suffolk expressed concerns about the potential combined effects of multiple projects upon the natural environment

The design of the Proposed Project includes a suite of embedded measures intended to minimise and mitigate adverse environmental impacts that have been assessed through the Environmental Statement and accompanying surveys. In undertaking works the Applicant will be required to secure various licences from Natural England and the Environment Agency to help safeguard specific interests.

The cumulative effects of the Proposed Project together with other projects, including Lion Link, EA1N/EA2, and Sizewell C, have been assessed and are reported within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter Project Cumulative Effects **[APP-060]**. In addition, however, the Applicant has submitted a robust suite of surveys characterising the wildlife populations of affected by the Proposed Project, determining their overall value, particularly given the temporary nature of many of the impacts. Application Document 6.2.2.2 (D) Part 2 Suffolk Chapter 2 Ecology and Biodiversity **[REP4-025]** concludes that there will be no significant residual effects on ecology and biodiversity with the implementation of the mitigation measures detailed in Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk **[REP-065]** and in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) **[REP5-115]**.

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com