



**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 5: Consultation Report**

Document 5.1: Consultation Report

Planning Inspectorate Reference: EN020026

Version: A  
March 2025

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009 Regulation 5(2)(q)  
Section 37(3) and Section 37(7) of the Planning Act 2008

**nationalgrid**

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#### 1 Project website update

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### Appendix B EIA scoping

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#### 1 EIA Scoping Report cover letter

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#### 2 EIA Scoping Report

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# Executive Summary

- Ex1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as an addition to new interconnection with mainland Europe.
- Ex1.1.2 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston Substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.
- Ex1.1.3 The Secretary of State for Business, Energy and Industrial Strategy) (whose role in relation to energy has now been replaced by the Department for Energy Security and Net Zero) directed on 31 March 2022 under Section 35 of the Planning Act 2008 that the Proposed Project is to be treated as development for which development consent is required. Consent must, therefore, be sought via a Development Consent Order.
- Ex1.1.4 The statutory pre-application consultation for the Proposed Project and the development of this report have been carried out in accordance with the requirements of the Planning Act 2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations).
- Ex1.1.5 In accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods used, National Grid undertook multi-stage pre-application consultations, allowing consultees several opportunities to provide feedback as the proposals evolved.
- Ex1.1.6 National Grid's approach to engagement and consultation was to carry out four phases of pre-application consultation. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by phase two (Statutory consultation), which was held between 24 October 2023 and 18 December 2023. Targeted consultation constituted phase three and took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement) which was held between 22 November 2024 and 12 January 2025.
- Ex1.1.7 All feedback received during these four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement by National Grid as part of its preparation of the application for development consent for the Proposed Project. Regard has been had to all feedback received, and changes have been introduced into the Proposed Project design as a result.
- Ex1.1.8 This Consultation Report provides details of the pre-application consultation, engagement and publicity that National Grid undertook, and sets out how the Proposed Project has evolved in response to feedback received during the pre-application consultation. This Consultation Report forms part of National Grid's application to the Secretary of State for the Proposed Project and has been prepared in fulfilment of Section 37(3)(c) of the Planning Act 2008. This requires the Development Consent

Order application to be accompanied by a consultation report giving details of the matters specified in Section 37(7).

# 1. About National Grid Electricity Transmission

## 1.1 Introduction

- 1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as an addition to new interconnection with mainland Europe.
- 1.1.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated and economic electricity transmission system.
- 1.1.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston Substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.
- 1.1.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals, to transmit electricity to:
- *Schedule 9(1)(a) '...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and*
  - *Schedule 9(1)(b) '...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*
- 1.1.5 This Consultation Report and accompanying annexes have been prepared to satisfy Section 37(3) and Section 37(7) of the Planning Act 2008. The purpose of the Consultation Report is to provide an account of the pre-application consultation activities undertaken by National Grid and explain how consultation responses have been taken into account in the preparation of the application for the Proposed Project.

## 1.2 The Proposed Project

- 1.2.1 The Proposed Project would comprise the following elements:

### The Suffolk Onshore Scheme

- a connection from the existing transmission network via Friston Substation, including the Substation itself. Friston Substation already has development consent as part of

other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the Substation would be constructed as part of the Proposed Project;

- a high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below);
- a 2 GW HVDC converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham;
- a HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology; and
- a landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

## The Offshore Scheme

- approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

## The Kent Onshore Scheme

- a landfall point on the Kent coast at Pegwell Bay;
- a TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below);
- a 2 GW HVDC converter station (including a new permanent access of the A256), approximately 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials and similar small scale operational plant near Minster. A new substation would be located immediately adjacent; and
- removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

1.2.2 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.



## 1.3 Summary of Proposed Project Development

- 1.3.1 **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** summarises how the Proposed Project has developed.
- 1.3.2 National Grid's approach to engagement and consultation was to carry out four phases of pre-application consultation. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by phase two (Statutory consultation), which was held between 24 October 2023 and 18 December 2023. Targeted consultation constituted phase three and took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement) which was held between 22 November 2024 and 12 January 2025.
- 1.3.3 As a result of changes to the design following feedback at Statutory consultation, further project design work and environmental survey and assessment, National Grid undertook Targeted consultation on design changes between 08 July 2024 and 11 August 2024.
- 1.3.4 Following Targeted consultation, National Grid made a number of further amendments to the Proposed Project and undertook pre-submission engagement between 22 November 2024 and 12 January 2025.
- 1.3.5 Plate 1.1 sets out each stage of the Proposed Project and indicative dates from pre-consultation through to application submission.

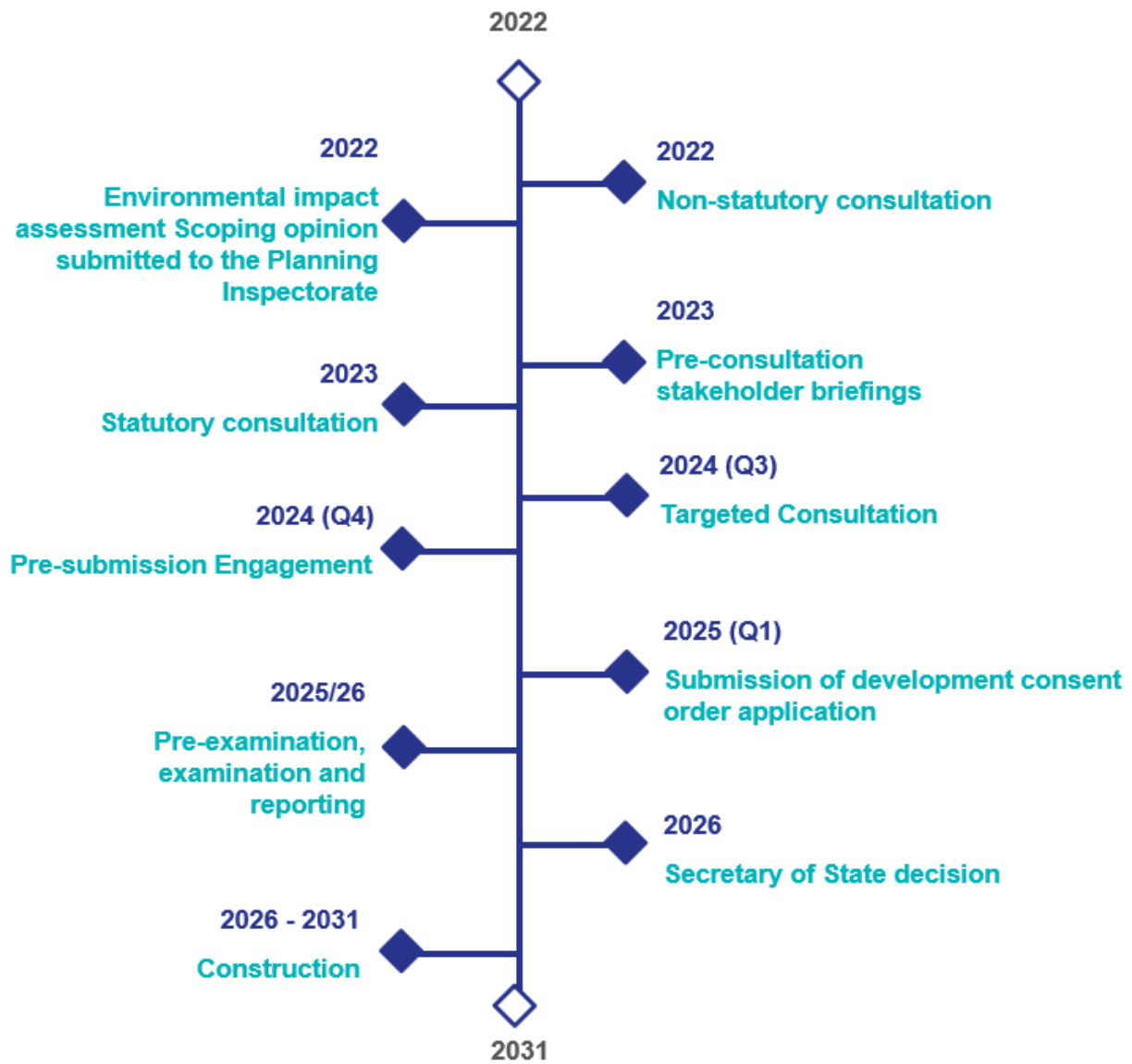


Plate 1.1 Proposed timeline

## 2. About the Consultation Report

### 2.1 Background to the Consultation Report

- 2.1.1 The Secretary of State (SoS) for Business, Energy and Industrial Strategy) (whose role in relation to energy has now been replaced by the SoS Department for Energy Security and Net Zero) directed on 31 March 2022 under Section 35 of the Planning Act 2008 that the Proposed Project is to be treated as development for which development consent is required. Consent must, therefore, be sought via a Development Consent Order (DCO).
- 2.1.2 The statutory pre-application consultation for the Proposed Project and the development of this report have been carried out in accordance with the requirements of the Planning Act 2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The Non-statutory consultation was also undertaken having regard to these principles.
- 2.1.3 The following guidance has also been taken into account:
- Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government's (DCLG) ((DCLG) D. f., 2015). This Guidance has been superseded by new Guidance issued in April 2024. However, as the Statutory consultation was undertaken prior to the issue date, the March 2015 guidance was followed. The April 2024 Guidance was followed for the Targeted consultation and pre-submission engagement in respect of the engagement that was statutory, Section 42(1)(d);
  - Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land (September 2013) (Department for Communities and Local Government (DCLG) ((DCLG) D. f., 2013);
  - Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation (September 2024);
  - the Ministry of Housing, Community and Local Government (MHCLG) Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024).
- 2.1.4 Statutory consultation and Targeted consultation were undertaken prior to the issue of the Ministry of Housing, Community and Local Government Advice Note (August 2024): Nationally Significant Infrastructure Projects: Advice on the Consultation Report. This guidance has been followed in relation to the production of this Consultation Report; however, in so far as the 2024 guidance contains advice in relation to undertaking Statutory consultation, National Grid has not been able to have regard to the guidance because it was not published at that time therefore National Grid carried out the Statutory consultation in accordance with the Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government's (DCLG) ((DCLG) D. f., 2015) that was in place at the time. However, National Grid followed the new guidance within reason, in terms of preparing this Consultation Report, - see Section 9.4 of this report.

- 2.1.5 Section 55 of the Planning Act 2008 sets out the criteria used by the Planning Inspectorate to decide if an application is of a satisfactory standard to be accepted for examination.
- 2.1.6 A checklist is included in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** which confirms compliance with the requirements of the Planning Act 2008, the EIA Regulations and the APFP Regulations and adherence to the relevant advice and guidance published by the Planning Inspectorate and UK Government.

## 2.2 Purpose of the Report

- 2.2.1 This Consultation Report is National Grid's report on all pre-application consultation for the Proposed Project, including both Statutory consultation and Non-statutory consultation to accompany an application for a DCO for the Proposed Project.
- 2.2.2 The requirement to submit a Consultation Report as part of the application for development consent is set out in Section 37(3)(c) of the Planning Act 2008. Section 37(7) confirms that the Consultation Report is a report giving details of:
- how National Grid has carried out consultation in compliance with statutory requirements (namely Sections 42, 47 and 48 of the Planning Act 2008);
  - any relevant responses within the meaning of Section 49(3) of the Act; and
  - how any relevant responses were considered (as per Section 49 of Planning Act 2008).
- 2.2.3 Accordingly, this report provides a detailed account of the pre-application consultation activities carried out by National Grid prior to the submission of the DCO application. It demonstrates that National Grid has complied with the statutory requirements and explains how relevant responses received were taken account of prior to the DCO application being submitted.

## 2.3 Legislative and Policy Context

- 2.3.1 This Consultation Report has been produced to satisfy Section 37(3) and Section 37(7) of the Planning Act 2008 and accompanies National Grid's DCO application.
- 2.3.2 In accordance with Section 37(7)(a) of the Planning Act 2008, this Consultation Report, its associated appendices and **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** demonstrate that National Grid has complied with the relevant sections of the Planning Act 2008 relating to pre-submission consultation, as follows:
- under Section 42, consulted with all those required to be consulted with, specifically the bodies prescribed in Schedule 1 of the APFP Regulations, the relevant local authorities and relevant landowners or other parties with an interest in the land (see Section 7.2, Chapter 9 of this report, section 1 and 2 **Application Document 5.1.6 Appendix E Statutory Consultation**, section 1 **Application Document 5.1.7 Appendix F Targeted Consultation** and section 1 **Application Document 5.1.9 Appendix H Pre-Submission Engagement**).
  - under Section 45, notified those required to be consulted with under Section 42 of the deadline for receipt of responses to the consultation and allowed at least 28 days

for consultees to respond which started the day after consultees received the consultation documents (see Section 7.2);

- under Section 46, prior to commencing the Statutory consultation, notified the SoS of the Proposed Project and provided them with the Section 42 consultation materials (see Section 7.3 and sections 3 to 7 of **Application Document 5.1.6 Appendix E Statutory Consultation**) and prior to commencing the Targeted consultation and provided them consultation materials, see section 2 to 13 **Application Document 5.1.7 Appendix F Targeted consultation**;
- under Section 47, consulted with the relevant local authorities on the content of the draft Statement of Community Consultation (SoCC), published a statement in local newspapers and made the SoCC available for inspection by the public, and consulted with the local community in accordance with the published SoCC (see Chapter 6, Chapter 7, Section 7.4 and **Application Document 5.1.5 Appendix D SoCC**);
- under Section 48, publicised the proposed application in the manner prescribed by Regulation 4 of the APFP Regulations (see Section 7.5 and section 9 and 22 **Application Document 5.1.6 Appendix E Statutory Consultation** and Section 9.3 and section 3 and 16 **Application Document 5.1.7 Appendix F Targeted consultation**); and
- under Section 49, this Consultation Report and its appendices include details of relevant responses received and how National Grid has had regard to the relevant responses (see section 24 and 25 of **Application Document 5.1.6 Appendix E Statutory Consultation**, section 17 and 18 **Application Document 5.1.7 Appendix F Targeted consultation** and table 10.4 of this report for pre-submission engagement).

2.3.3 A summary of the consultation undertaken in accordance with the EIA Regulations is also included in Chapter 4 of this report.

2.3.4 National Grid's consultation process and the preparation of this report has also taken account of the following statutory and non-statutory guidance:

- Guidance on procedural requirements for major infrastructure projects (published by the former Ministry of Housing, Communities and Local Government, December 2020);
- Guidance on the pre-application process (published by the former Department for Communities and Local Government, March 2015) ('the DCLG pre-application guidance');
- Guidance on the pre-application stage for Nationally Significant Infrastructure Projects (Department for Levelling Up, Housing and Communities, April 2024) for Targeted consultation;
- Guidance related to procedures for the compulsory acquisition of land (published by the former Department for Communities and Local Government, September 2013) ('the Planning Act 2008 DCLG compulsory acquisition guidance');
- Overarching National Policy Statement for Energy (EN-1), November 2023, (NPS EN-1);
- National Policy Statement for Renewable Energy Infrastructure (EN-3), November 2023, (NPS EN-3);

- National Policy Statement for Electricity Networks Infrastructure (EN-5), November 2023, (NPS EN-5);
- Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation (September 2024);
- the Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment (June 2020); and
- the Ministry of Housing, Community and Local Government (MHCLG) Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024).

2.3.5 Statutory consultation and Targeted consultation were undertaken prior to the issue of the Ministry of Housing, Community and Local Government Advice Note (August 2024): Nationally Significant Infrastructure Projects: Advice on the Consultation Report. This guidance was followed in relation to the production of this Consultation Report; however, in so far as the 2024 guidance contained advice in relation to undertaking Statutory consultation and Targeted consultation, National Grid has not been able to have regard to the guidance because it was not published at that time therefore National Grid carried out the Statutory consultation and Targeted Consultation in accordance with the Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government's (DCLG) ((DCLG D. f., 2015) that was in place at the time. However, National Grid followed the new guidance within reason when compiling this Consultation Report, see Section 9.4 of this report.

2.3.6 This Chapter signposts to relevant sections in this report which summarise the activities undertaken by National Grid to ensure compliance with the relevant requirements. Evidence of this compliance is supplied in the Consultation Report appendices where relevant and appropriate. A detailed compliance statement setting out how National Grid has complied with the relevant provisions of the Planning Act 2008, the APFP Regulations, the EIA Regulations, the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 (2020 Regulations), statutory guidance documents and the Planning Inspectorate's Advice Notes are included in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**.

## 2.4 Data Protection

2.4.1 Further to the Planning Inspectorate's: Advice Note: Nationally significant infrastructure projects: Advice on the consultation report:

*'The applicant must ensure that the consultation report complies with data protection legislation and that the personal data of individuals is treated appropriately. This may include redaction of data and obtaining informed consent from the individuals concerned as appropriate.*

*The consultation report should not include the following items (if necessary, relevant information should be redacted by the applicant):*

- *private home addresses of individuals or information that could lead to the identification of the location of a private individual*
- *private email addresses and telephone numbers of individuals*



- *sensitive or special category data within the meaning of the Data Protection Act 2018 and UK General Data Protection Regulation*
- *written signatures*
- *photographs of the faces of individuals who have not given consent to have their image published, including images taken at consultation events*
- *information that could lead to the identification of a specific location of a protected species.'*

2.4.2 Preparation and submission of application documents, National Grid is aware that this report will be published on the National Infrastructure Planning website. National Grid must ensure it complies with the Data Protection Act 2018, which came into force on 25 May 2018, following the introduction of the General Data Protection Regulation in 2016. As such, National Grid has avoided the inclusion of personal data relating to individuals, and information such as individuals' names and addresses in this report have been replaced by a number for each consultee.

2.4.3 In summary, personal details in this report have been handled responsibly and where necessary redacted to ensure that National Grid complies with the requirements of the Data Protection Act 2018 in production and publication of this report.

## 2.5 Structure of the Report

2.5.1 The remainder of this report is structured as follows:

- Chapter 1 provides an overview of National Grid, including its role and statutory duties, and introduces the Proposed Project, including an overview of the development to date;
- Chapter 2 introduces the Consultation Report and its structure;
- Chapter 3 provides a summary of National Grid's approach to pre-application consultation and provides an overview of Non-statutory and Statutory consultation and engagement for the Proposed Project, including how National Grid has complied with statutory requirements and other guidance;
- Chapter 4 provides an overview of the consultation held as part of the EIA process;
- Chapter 5 provides an account of the Non-statutory consultation held between 24 October and 18 December 2022 detailing consultation activities undertaken and representations received;
- Chapter 6 provides an overview of activities undertaken in advance of and to support the Statutory consultation, including the development of the SoCC;
- Chapter 7 provides an overview of the Statutory consultation held between 24 October and 18 December 2023, including compliance with the requirements of the Planning Act 2008;
- Chapter 8 summarises the responses received to the Statutory consultation and the changes made as a result;
- Chapter 9 provides an overview of the Targeted consultation undertaken in 2024;
- Chapter 10 provides an overview of the Pre-submission engagement undertaken between November 2024 and January 2025; and

- Chapter 11 sets out the conclusions of the Report.

2.5.2 Further to the Planning Inspectorate's: Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024):

*'There is no standard format for a consultation report. This advice provides some good practice guidelines about the structure of a consultation report.*

*The main aim of the consultation report is to provide clarity on what consultation has been done and how the applicant has taken feedback into account. The Planning Inspectorate should be able to understand how the consultation was undertaken and how the issues raised have been addressed or responded to. The report does not need to include an excessively detailed description of every element of the consultation programme.*

2.5.3 Introductory text should provide an overview including:

- a summary of the consultation activities undertaken
- a table or timeline summarising both statutory and non-statutory consultation in chronological order

2.5.4 It is helpful if each stage of non-statutory and statutory consultation is presented and explained chronologically in separate chapters or sections of the report. This can also include separate summary schedules of consultation responses for each round of consultation, which could be included as an appendix to the report.'

2.5.5 National Grid has prepared a Consultation Report (**Application Document 5.1 Consultation Report**) (this report) to accompany the DCO application. In preparing the Consultation Report, National Grid has had regard to the DCLG Guidance, Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects and Nationally Significant Infrastructure Projects: Advice on the Consultation Report (August 2024).

2.5.6 Chapter 3, (see **Application Document 5.1 Consultation Report** (of this report)) provides an overview of the overall approach to the pre-application consultation along with table 3.1 providing a summary of pre-applications consultation stages and plate 1.1 provides a timeline.

2.5.7 **Application Document 5.1 Consultation Report** (this report) is structured chronologically with dedicated chapters for each stage of non-statutory, statutory, targeted consultation and pre-submission engagement. A full list of appendices accompanying the Consultation Report is included in the contents page. The list describes the content of each appendix, which have been subdivided into the different strands of consultation undertaken.

2.5.8 Additional information and evidence relating to the consultation process is set out in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** and Appendices A-H (**Application Documents 5.1.2 to 5.1.9**).

## 3. Approach to Consultation and Engagement

### 3.1 Approach

3.1.1 National Grid is committed to engaging those communities considered to be affected by its activities. National Grid's Stakeholder, Community and Amenity Policy incorporates its Schedule 9 Statement relating to the preservation of amenity and makes the following commitments to consultation when undertaking electricity works:

- National Grid will promote genuine and meaningful stakeholder and community engagement;
- National Grid will meet and, where appropriate, exceed the statutory requirements for consultation or engagement, and will adopt the following principles to help meet this commitment:
  - seek to identify and understand the views and opinions of all the stakeholders and communities who may be affected by the Proposed Project;
  - provide opportunities for engagement from the early stages of the process where options and alternatives are being considered and there is the greatest scope to influence the design of the Proposed Project;
  - endeavour to enable constructive debate to take place, creating open and two-way communication processes;
  - ensure that benefits, constraints and adverse impacts of the Proposed Project are communicated openly for meaningful stakeholder and community comment and discussion. National Grid will be clear about any aspects of the Proposed Project that cannot be altered;
  - utilise appropriate methods and effort in engaging stakeholders and communities, proportionate to the scale and impact of the Proposed Project; and
  - provide feedback on how views expressed have been considered and the outcomes of any engagement process or activity.

3.1.2 These principles informed the approach to consultation/engagement at each stage of the Proposed Project, including the SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) and the way in which representations received have been dealt with by the Project team. During the development of new infrastructure in the UK, it has been necessary for National Grid to develop procedures and expertise in how to effectively communicate, engage and consult with stakeholders as part of the Proposed Project's development, in line with National Grid's commitments discussed above.

3.1.3 National Grid's consultation experience extends from its development of electricity transmission projects both prior to and since the introduction of the Planning Act 2008. From this experience, the Proposed Project has been able to draw upon effective, tried and tested methods of consultation and engagement and has been able to adapt these to the local area.

- 3.1.4 For the Proposed Project, National Grid has sought to engage thoroughly with affected stakeholders throughout its development, whether these stakeholders are individuals, organisations or prescribed consultees. National Grid has built upon its own knowledge and experience of consultation by agreeing strategies and methods of engagement with affected local planning authorities in advance of formal consultation.
- 3.1.5 Consideration of the feedback received through consultation and wider stakeholder engagement has been a major contributing factor in the development of the Proposed Project. Consultation has been completed at an early stage in the development of proposals to allow consultees to have a real opportunity to influence the Proposed Project.
- 3.1.6 Consultation with stakeholders and the local community has helped inform decisions at various stages throughout the development of the Proposed Project, including the preliminary routing and siting of works, to more detailed design stages including the location and appearance of converter stations, cable routing, and the location of construction and maintenance phase works.
- 3.1.7 Undertaking consultation at a series of project stages was aimed at managing the balance between consulting early, whilst also having the necessary detail for consultees to provide meaningful feedback. To support this, at each stage of the consultation process, clear parameters were set out to explain to consultees the information presented and how feedback can influence the Proposed Project during each specific stage of consultation.

## 3.2 Overview of the Consultation Process

- 3.2.1 This section provides an overview of the pre-application consultation activities undertaken by or on behalf of National Grid.
- 3.2.2 National Grid recognises that the planning regime established by the Planning Act 2008 places substantial importance on pre-application consultation and has invested considerable time and resources to encourage meaningful involvement in the pre-application process by the local community, those with an interest in the land, local authorities, other prescribed consultees and other non-prescribed stakeholders. Thus, the Proposed Project has been developed in a consultative and iterative manner, during successive stages of development.
- 3.2.3 The main stages of National Grid's pre-application consultation are summarised in Table 3.1. The terms summarised in Table 3.1 are used throughout this report to describe specific consultation stages.

Table 3.1 Summary of pre-application consultation stages

| Date            | Activity         | Details                                                                                                                                                                                                                                                                                  |
|-----------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2020/early 2021 | Early engagement | Initial engagement with local planning authorities in Suffolk and Kent, the Environment Agency, Natural England Closed and the Marine Management Organisation, identifying the Proposed Project study area, mapping constraints, identifying and appraising corridor and siting options. |

| Date                               | Activity                   | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Summer 2021                        | Marine survey engagement   | Project-specific marine surveys (geophysical/geotechnical/environmental) were undertaken in Summer 2021. Marine stakeholders were engaged at this stage to discuss the emerging landfall and routing preferences in the marine environment, ensuring any feedback that may influence route selection/optimisation could be taken into consideration prior to surveys starting. Stakeholders involved included the Marine Management Organisation, Historic England (marine), the Crown Estate, Inshore Fisheries and Conservation Authorities, Trinity House, developers (including Greater Gabbard, National Grid Ventures (NGV), Galloper, SPR, North Falls and Five Estuaries), aggregate operators and the Port Authorities of London, Harwich Haven, Felixstowe, Lowestoft and Ramsgate. |
| October 2021 ongoing               | Non-statutory engagement   | Engagement with statutory stakeholders (including the Environment Agency, Natural England, Historic England, relevant local authorities, locally elected representatives and local community groups) has been undertaken throughout the pre-application process, separately from the Non-statutory and Statutory consultation stages.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| October 2022 to December 2022      | EIA scoping                | Request from National Grid to the SoS to provide a Scoping Opinion. The SoS provided a Scoping Opinion following consultation with prescribed bodies. This stage is referred to as the 'EIA scoping' or 'EIA scoping consultation' throughout the report. Further details are provided in Chapter 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| October 2022 to December 2022      | Non-statutory consultation | Consultation with stakeholders (including the local community) was undertaken. National Grid held Non-statutory public events and briefing events for stakeholders. During this stage, National Grid sought responses on a non-statutory basis on the preliminary routing and siting options, provided information on the evolution of the design and those design options that were not preferred, and invited local knowledge and opinion. Chapter 5 of this report provides further details on the Non-statutory consultation undertaken by National Grid.                                                                                                                                                                                                                                 |
| April 2023 ongoing to January 2025 | EIA thematic meetings      | EIA thematic meetings with local authority officers and representatives from other stakeholder groups.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| June 2023 to October 2023          | Draft SoCC consultation    | Consultation with host local authorities in line with Section 47 of the Planning Act 2008 regarding the approach to the Statutory consultation and the content of the SoCC. This stage is referred to as the 'SoCC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Date                          | Activity                  | Details                                                                                                                                                                                                                                                           |
|-------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               |                           | consultation' throughout the report. Further details are contained in Chapter 6 of this report.                                                                                                                                                                   |
| October 2023 to December 2023 | Statutory consultation    | Consultation in line with Sections 42, 46, 47 and 48 of the Planning Act 2008. This stage is referred to as the 'Statutory consultation' throughout the report. Further details are contained in Chapters 7 and 8 of this report.                                 |
| July 2024 to August 2024      | Targeted consultation     | Targeted consultation was undertaken between 8 July 2024 and 11 August 2024 as a result of minor refinements to the Application Boundary that was consulted on during the Statutory consultation phase. Further details are provided in Chapter 9 of this report. |
| November 2024 to January 2025 | Pre-submission engagement | A further round of consultation as a result of amendments to the Proposed Project reflecting feedback received during both Statutory and Targeted Consultation. Further details are provided in Chapter 10 of this report.                                        |

- 3.2.4 National Grid has encouraged a range of people to express their views on the Proposed Project through Non-statutory engagement, Non-statutory consultation and Statutory consultation activities, and has had regard to those views, as evidenced in this report and **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**.
- 3.2.5 In light of the above, National Grid considers that its approach to pre-application consultation has been '*thorough, effective and proportionate*' taking account of relevant legislative requirements and guidance (Paragraph 25 of the DCLG pre-application guidance and pre-application stage for Nationally Significant Infrastructure Projects guidance, April 2024 (Targeted consultation only, see Chapter 2).

## 3.3 Consultation Periods

- 3.3.1 National Grid has been engaging with stakeholders in an ongoing and extensive manner since the Proposed Project commenced in 2020, and details of this engagement are provided in this section. National Grid has also held four defined periods of consultation and engagement with stakeholders and members of the local community, comprising the Non-statutory consultation, the formal Statutory consultation, a period of further engagement (Targeted consultation) and a period of further engagement (Pre-submission engagement).

### Non-Statutory Consultation

- 3.3.2 Non-statutory consultation was held over an eight-week period from 24 October to 18 December 2022. The purpose of this consultation period was to introduce the Proposed Project to the public, explain the need for the Proposed Project, set out the options that were under consideration for individual project elements, give stakeholders and members of the public an opportunity to provide feedback on the proposals and present the next steps.



## Statutory Consultation

- 3.3.3 Statutory consultation was held over an eight-week period from 24 October to 18 December 2023. The purpose of this phase of consultation was to seek the views of the communities, landowners, prescribed bodies and other local stakeholders on the Proposed Project proposals which had been developed following Non-statutory consultation. The Statutory consultation was open to anyone with an interest in the Proposed Project.

## Targeted Consultation

- 3.3.4 Targeted consultation was held over a five-week period from 08 July 2024 to 11 August 2024 as a result of minor refinements to the Application Boundary that was consulted on during the Statutory consultation phase. The purpose of this consultation was to seek the views of the communities, landowners, prescribed bodies and other local stakeholders on the changes that had been made to the Proposed Project. The Targeted consultation was open to anyone with an interest in the Proposed Project.

## Pre-Submission Engagement

- 3.3.5 Following changes to the Proposed Project after Targeted consultation, National Grid sought proportionate engagement with relevant stakeholders prior to submission of the Development Consent Order application. This was undertaken over a seven-week period between 22 November 2024 and 12 January 2025.

## Further Engagement

- 3.3.6 Following the four periods of consultation, National Grid continued to organise meetings with prescribed bodies, the Host Authorities, local landowners and local stakeholder groups. These meetings sought to discuss consultation responses, changes to the Proposed Project, share information and consider opportunities for further refinements. National Grid also provided updated information on the Proposed Project website and distributed newsletters to addresses in both Suffolk and Kent.

## 3.4 Non-Statutory Engagement

- 3.4.1 National Grid has sought to engage with stakeholders throughout the development of the Proposed Project including outside of the four consultation periods. This informal or Non-statutory engagement has been undertaken through various mechanisms and has sought to keep key stakeholders informed about the progress of the Proposed Project, inform the ongoing design and enable timely discussions on opportunities and concerns identified.
- 3.4.2 This section explains National Grid's approach to Non-statutory engagement undertaken before and after the four consultation periods.

## Non-Statutory Engagement Prior to Statutory Consultation

### Engagement with prescribed bodies and relevant local authorities

- 3.4.3 Outside of formal periods of consultation National Grid has maintained a programme of regular engagement with prescribed bodies comprising monthly meetings with the

Environment Agency, Natural England, and joint meetings with the host local authorities in Suffolk and Kent. Engagement with Suffolk County Council also includes the Suffolk & Essex Coast and Heaths National Landscape Manager, while periodic meetings are also held with Historic England. These meetings are used to gather feedback and discuss the potential environmental impacts of the Proposed Project and how best to mitigate them. These discussions helped to determine the information to be presented in the Preliminary Environmental Information Report presented at the Statutory consultation.

- 3.4.4 In the early stages, National Grid engaged with Category A, B and C local authorities, providing briefings on the background to the Proposed Project. Similarly, a number of statutory undertakers were engaged to discuss potential project interfaces.
- 3.4.5 Following Non-statutory consultation (24 October to 18 December 2022), National Grid identified a number of prescribed bodies who had not previously been consulted, including six Category D local authorities (Surrey County Council, Cambridgeshire County Council, Medway Council, Thurrock Council, London Borough of Bexley and London Borough of Bromley), along with the Greater London Authority (who were added on a precautionary basis) and a number of statutory undertakers. These were subsequently contacted and given the opportunity to engage with the Proposed Project prior to the Statutory consultation. National Grid met with, and provided a briefing for, consultees who responded to this invitation. National Grid has continued to review the list of consultees as the Proposed Project has developed, to ensure that it is maintained and up to date.
- 3.4.6 Since the Proposed Project has a significant proportion offshore, National Grid has engaged with marine-focused consultees including the Marine Management Organisation, the Maritime and Coastguard Agency, the Crown Estate, Trinity House and the Port Authorities of Felixstowe, Harwich Haven, London, Lowestoft, Ramsgate and Sandwich, together with Joint Port Authorities for Shipping and Navigation. National Grid also attended a Commercial Fisheries Working Group meeting, which represents the interests of numerous east coast Fishermen's Associations. Furthermore, engagement was held with the following aggregate companies: Britania Aggregates, Cemex, Hanson and Tarmac.
- 3.4.7 Table 3.2 provides details of the engagement undertaken with prescribed bodies and the relevant local authorities prior to the Statutory consultation. The table is not exhaustive and seeks to demonstrate key activities carried out rather than a complete record of all communication between National Grid and stakeholders.

**Table 3.2 Non-statutory engagement prior to Statutory consultation**

| <b>Date</b>             | <b>Description of activity undertaken</b>                                                                                                                                                                                                                                                                                                                                  |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| October 2021<br>ongoing | Joint stakeholder update meetings with host local authorities in Suffolk (East Suffolk Council and Suffolk County Council and Kent (Dover District Council, Thanet District Council and Kent County Council) covering all aspects of the Proposed Project throughout the development stages, including introductory meetings, project updates, pre-consultation briefings. |
| October 2021<br>ongoing | Regular meetings with statutory bodies, including Natural England, Environment Agency and Historic England, relevant local authorities,                                                                                                                                                                                                                                    |

| Date                         | Description of activity undertaken                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | locally elected representatives and local community groups. The aim of this engagement was to introduce and notify stakeholders about the proposals and DCO process, to gain an understanding of local and technical issues regarding the Project, and to take technical advice from prescribed bodies. Furthermore, discussions were held regarding permitting requirements for the programme of survey works. Chapter 5 of this report provides further details regarding the Non-statutory engagement undertaken by National Grid. |
| 06 October 2022              | Commercial Fisheries Working Group: pre-Non statutory consultation briefing for representatives of east coast Fishermen's Associations.                                                                                                                                                                                                                                                                                                                                                                                               |
| October 2022 to October 2023 | EIA thematic meetings with local authority officers and representatives from statutory environmental bodies, covering landscape, ecology, geology and hydrogeology, socio-economics and tourism, traffic and transport, water environments, health and wellbeing and environmental health. Meetings have been held separately with bodies such as the local Wildlife Trusts and the Royal Society for the Protection of Birds (RSPB).                                                                                                 |

### Engagement with (non-prescribed bodies/ or specific local groups)

- 3.4.8 National Grid has engaged periodically with local groups through the pre-application phases of the Proposed Project. Meetings have occurred with specific individual interest groups who, in some cases, are also identified as landowners, such as the (RSPB) North Warren Nature Reserve.
- 3.4.9 In some cases, there has been collaborative engagement with groups of stakeholders with shared interests affected by the Proposed Project and other projects. The Suffolk Coast Electricity Cable Ecology Group involves both National Grid and NGV (LionLink) engaging collaboratively with local authorities (including Suffolk and Essex Coast and Heaths National Landscape team), Natural England, Suffolk Wildlife Trust and the Royal Society for the Protection of Birds to discuss concerns around the cumulative effects of projects and approaches to avoidance and mitigation.

### Engagement with landowners

- 3.4.10 National Grid has liaised with affected landowners and their representatives throughout the development of the Proposed Project in person, by telephone, in writing and via the Proposed Project dedicated email address. This has included engagement both within and outside of the formal Statutory consultation periods. Formal engagement with affected landowners, in accordance with Section 42(1)(d) of the Planning Act 2008, is summarised in Section 7.2 of this report.
- 3.4.11 Engagement with landowners has included negotiating access agreements for both intrusive and non-intrusive site investigation work for the purpose of assessing the likely impacts of the Proposed Project. Licence agreements are being continually negotiated and agreed with impacted landowners and compensation is being paid relevant to the surveys. Throughout the early stages of the Proposed Project and during formal periods of consultation, there has been ongoing dialogue with landowners who may be affected by construction and the permanent rights associated with the Proposed Project.

Feedback from landowners has helped provide understanding of specific impacts and informed mitigation measures and design changes.

- 3.4.12 **Application Document 4.2 Statement of Reasons** submitted with the DCO application further sets out how National Grid has engaged with affected landowners in relation to compulsory acquisition and temporary possession of land.

## Project website updates

- 3.4.13 National Grid published information about the Proposed Project and notice of upcoming public consultations on its dedicated webpage leading up to the Statutory consultation (see **Application Document 5.1.2 Appendix A Non-Statutory Engagement**).

## Non-Statutory Engagement After Statutory Consultation

- 3.4.14 This section provides an overview of the continued Non-statutory engagement undertaken by National Grid following the Statutory consultation period.

## Meetings

- 3.4.15 National Grid continued to organise meetings with prescribed bodies, Kent County Council, Suffolk County Council, East Suffolk Council, Dover District Council and Thanet District Council and local landowners once the formal periods of consultation were completed. These meetings sought to discuss consultation responses, changes to the Proposed Project, share information and consider opportunities for further refinements.
- 3.4.16 Table 3.3 provides an overview of the meetings held with various stakeholders. The table is not exhaustive and seeks to demonstrate key activities carried out rather than a complete record of all communication between National Grid and stakeholders.

Table 3.3 Post consultation Non-statutory engagement activities

| Date                 | Description of activity undertaken                                                                                                                                                                                                                                                                                                                |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| January 2024 ongoing | Joint stakeholder update meetings with the Suffolk local authorities, and joint stakeholder meetings with the Kent local authorities, covering all aspects of the Proposed Project throughout the development stages, including introductory meetings, project updates, pre-consultation briefings.                                               |
| January 2024 ongoing | Regular meetings with statutory bodies, including Natural England, Environment Agency, Marine Management Organisation and Historic England covering Proposed Project updates, permitting requirements for the programme of survey works.                                                                                                          |
| January 2024 ongoing | EIA thematic meetings with local authority officers and representatives from other stakeholder groups, covering landscape, ecology, geology and hydrogeology, socio-economics and tourism, traffic and transport, water environments, health and wellbeing, environmental health, herring and sandeel, physical processes and marine archaeology. |

## Engagement with landowners

- 3.4.17 Since the Statutory consultation, National Grid has continued to engage with landowners. This has included written communication and phone calls, as well as meetings were requested or identified as necessary.
- 3.4.18 Landowner meetings have been undertaken with landowners and in most cases their respective land agents. In some cases, online meetings have been held, in addition to or instead of face-to-face meetings. Discussions have informed design decisions and where appropriate have involved relevant specialists from National Grid's Proposed Project team, to help share technical information or advice where relevant to the points of discussion.
- 3.4.19 **Application Document 4.2 Statement of Reasons** submitted with the DCO application further sets out how National Grid has engaged with affected landowners in relation to compulsory acquisition and temporary possession of land.

## Information documents

- 3.4.20 Table 3.4 provides an overview of written correspondence sent by National Grid to stakeholders.

Table 3.4 Information documents circulated by National Grid

| Date          | Details                                                                                                                                                                                                                                                                                                                                                             |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| April 2024    | Update newsletter distributed to circa 35,000 addresses in Suffolk and Kent. The distribution area was the same as the one used during the Statutory consultation for consistency. Content included a post-Statutory consultation update and signposting residents and businesses to the dedicated project website and electronic mailing list for further updates. |
| July 2024     | Update newsletter distributed to circa 35,000 addresses in Suffolk and Kent. The distribution area was essentially the same as for Statutory consultation but adapted where necessary to the new Order Limits.                                                                                                                                                      |
| February 2025 | Update newsletter distributed to circa 35,000 addresses in Suffolk and Kent. The distribution area was the same as the one used during the Targeted consultation for consistency. Content included a reminder of the key aspects of the proposals, responses to frequently asked questions about the Project and an overview of the project timeline.               |

## Website updates

- 3.4.21 The dedicated Proposed Project consultation website was updated at regular intervals, such as at the close of the Statutory consultation, reflecting key milestones in the Project timeline. Between major milestones, minor updates were made as and when required. Minor updates include publishing survey information on the survey page and promoting announcements on the home page. National Grid's community update newsletter (see section 7 of **Application Document 5.1.6 Appendix E Statutory consultation** and section 2 of **Application Document 5.1.7 Appendix F Targeted consultation**) was also published on the website to ensure online audiences could access the latest updates on the Proposed Project.

## Statements of common ground

- 3.4.22 Where possible, National Grid is endeavouring to make early progress in preparing Statements of Common Ground (SoCG) with stakeholders, such that agreed SoCG can be submitted in a timely manner to the examination process to assist the Examining Authority in understanding which matters have been agreed and which remain unresolved.
- 3.4.23 Each SoCG sets out a record of consultation undertaken to date with the stakeholder, the key agreements reached and outstanding matters unresolved.
- 3.4.24 National Grid is in the process of pursuing SoCG with the following consultees. Draft SoCG have been prepared for the following:
- Natural England (**Application Document 7.4.1**);
  - Historic England (**Application Document 7.4.3**);
  - Marine Management Organisation (**Application Document 7.4.4**);
  - Thanet District Council (**Application Document 7.4.5**);
  - Dover District Council (**Application Document 7.4.6**);
  - Kent County Council (**Application Document 7.4.7**);
  - East Suffolk Council/Suffolk County Council (**Application Document 7.4.8**);
  - Harwich Haven Authority (**Application Document 7.4.9**);
  - Maritime and Coastguard Agency (**Application Document 7.4.10**);
  - Port of London Authority (**Application Document 7.4.11**);
  - Trinity House (**Application Document 7.4.12**);
  - UK Chamber of Shipping (**Application Document 7.4.13**);
  - Sandwich Port and Haven Commissioners (**Application Document 7.4.14**); and
  - Port of Ramsgate (**Application Document 7.4.15**).

## 3.5 Legislation and Guidance

### Statutory Requirements

- 3.5.1 The pre-application consultation process and production of this report have been carried out in accordance with the following requirements of primary and secondary legislation:
- the Planning Act 2008;
  - the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'Infrastructure EIA Regulations 2017'); and
  - the Infrastructure Planning (Applications: Prescribed Forms and Procedure Regulations 2009 (the 'APFP Regulations').
- 3.5.2 The following statutory guidance has been followed in the design and delivery of the consultation process and preparation of this report:



- Guidance on procedural requirements for major infrastructure projects (published by the former Ministry of Housing, Communities and Local Government, December 2020);
- Guidance on the pre-application process (published by the former Department for Communities and Local Government, March 2015) ('the DCLG pre-application guidance'); and
- Guidance on the pre-application stage for Nationally Significant Infrastructure Projects (published by the Department for Levelling Up, Housing and Communities, April 2024). This guidance was issued after the Statutory consultation had finished and has been followed for Targeted consultation only.

3.5.3 Statutory consultation and Targeted consultation were undertaken prior to the issue of the Ministry of Housing, Community and Local Government Advice Note (August 2024): Nationally significant infrastructure projects: Advice on the consultation report. This guidance was followed in relation to the production of this Consultation Report; however, in so far as the 2024 guidance contained advice in relation to undertaking Statutory consultation, National Grid has not been able to have regard to the guidance because it was not published at that time therefore National Grid carried out the Statutory consultation in accordance with the Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government's (DCLG) ((DCLG) D. f., 2015) that was in place at the time. However, National Grid followed the new guidance within reason, see Section 9.4 of this report.

3.5.4 National Grid also considered the following non-statutory advice notes published by the Planning Inspectorate:

- Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation (September 2024);
- the Ministry of Housing, Community and Local Government (MHCLG) Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024)

3.5.5 Evidence of this compliance is supplied in the Consultation Report Appendices where relevant and appropriate. A detailed compliance statement setting out how National Grid has complied with the relevant provisions of the Planning Act 2008, the APFP Regulations, the EIA Regulations, statutory guidance documents and the PINs Advice Notes are included in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**.

## The Planning Act 2008

3.5.6 The following provisions of the Planning Act 2008 are relevant to the Statutory consultation undertaken on the Proposed Project:

- Section 42: Duty to consult;
- Section 43: Local authorities for purposes of Section 42(1)(b);
- Section 44: Categories for purposes of Section 42(1)(d);
- Section 45: Timetable for consultation under Section 42;
- Section 46: Duty to notify the SoS of proposed application;
- Section 47: Duty to consult local community;

- Section 48: Duty to publicise;
- Section 49: Duty to take account of responses to consultation and publicity; and
- Section 50: Regard to government's pre-application guidance.

## Sections 42, 43 and 44 of the Planning Act 2008

3.5.7 Section 42(1) of the Planning Act 2008 states:

*'42. Duty to consult*

*The Applicant must consult the following about the proposed application*

*(a) Such persons as may be prescribed*

*(aa) The Marine Management Organisation, in any case where the proposed development would affect, or would be likely to affect any of the areas specified in subsection (2)*

*(b) Each local authority that is within Section 43*

*(c) The Greater London Authority if the land is in Greater London, and*

*(d) each person who is within one or more of the categories set out in Section 44'*

3.5.8 Sub-section 42(c) is not relevant to this Proposed Project because it is not located within Greater London.

3.5.9 For the purposes of Section 42(1)(a) of the Planning Act 2008, the persons prescribed are those listed in column 1 of the table in Schedule 1 of the APFP Regulations, as applicable<sup>1</sup>.

3.5.10 Section 42(1)(b) local authorities are defined in Section 43 of the Planning Act 2008. There are 'A', 'B', 'C' and 'D' category local authorities, depending on the tier of the authority and its location in relation to the Proposed Project.

3.5.11 Section 42(1)(d) parties consist of persons with interests in land affected by the Proposed Project or who may be able to bring a relevant claim should the application for development consent be granted and fully implemented. Section 44 of the Planning Act 2008 sets out the categories of persons within Section 42(1)(d) as:

- a person is within Category 1 if the Applicant, after making diligent inquiry, knows that the person is an owner, lessee, tenant (whatever the tenancy period) or occupier of the land;
- a person is within Category 2 if the Applicant, after making diligent inquiry, knows that the person –
  - a. is interested in the land, or
  - b. has power –
    - i. to sell and convey the land, or
    - ii. to release the land;

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<sup>1</sup> National Grid acknowledges that the list of prescribed consultees was amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024; however, the regulations came into effect following the Project Statutory consultation.

- a person is within Category 3 if the Applicant thinks that, if the order sought by the proposed application were to be made and fully implemented, the person would or might be entitled to make a relevant claim. A 'relevant claim' is then defined in Section 44 by reference to a claim under Section 10 of the Compulsory Purchase Act 1965 (compensation where satisfaction not made for the taking, or injurious affection, of land subject to compulsory purchase), a claim under Part 1 of the Land Compensation Act 1973 (compensation for depreciation of land value by physical factors caused by use of public works) or a claim under Section 152(3) of the Planning Act 2008 (compensation in case where no right to claim in nuisance).

3.5.12 Chapter 7, Section 7.2 of this report provides a description of how National Grid identified Section 42(1)(a), (aa), (b) and (d) parties and evidences how National Grid complied with the statutory requirements for consultation under Section 42 of the Planning Act 2008 during the Statutory consultation and Chapter 9, Section 9.2 for Targeted consultation.

## **Section 45 of the Planning Act 2008**

3.5.13 Section 45 of the Planning Act 2008 requires the Applicant, when consulting a person under Section 42, to notify them of the deadline for the receipt of comments to the consultation. This must be a minimum of 28 days which begins on the day after the day on which the person receives the consultation documents. Consultation materials must be supplied to the person by the Applicant for the purpose of consulting them. Chapter 7 of this report provides a summary of the activities undertaken by National Grid for the Statutory consultation and Chapter 9 for the Targeted Consultation to ensure compliance with Section 45 of the Planning Act 2008.

## **Section 46 of the Planning Act 2008**

3.5.14 Under Section 46 of the Planning Act 2008, National Grid is required to notify the SoS for the Proposed Project by providing the Section 42 consultation information on or before commencement of that consultation. Chapter 7, Section 7.3 of this report provides details of the documents issued to the Planning Inspectorate, on behalf of the SoS in accordance with Section 46 of the Planning Act 2008 for the Statutory consultation and Chapter 9, Section 9.2 for the Targeted consultation.

## **Section 47 of the Planning Act 2008**

3.5.15 Under Section 47(1) of the Planning Act 2008, a SoCC must be developed for the Proposed Project and must set out how National Grid proposes to consult people living in the Proposed Project's vicinity.

3.5.16 In accordance with Section 47(2) of the Planning Act 2008, National Grid must consult each local authority that is within Section 43(1) (i.e. a local authority is in this Section if the land is in the authority's area) in respect of the content of the SoCC, because their knowledge of the local area may influence decisions on the geographical extent of the consultation and the methods that will be most effective in the local circumstances. Those local authorities must submit their comments on the SoCC within 28 days of receiving the consultation documents. National Grid also must have regard to any responses received before the deadline, as outlined in Section 47(5) of the Planning Act 2008.

3.5.17 Once the SoCC is finalised, National Grid must:

- under Section 47(6)(za), make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the Proposed Project;
  - under Section 47(6)(a), publish in a newspaper circulating in the vicinity of the Proposed Project, a notice stating where and when the statement can be inspected; and
  - under Section 47(6)(b), publish the statement in such manner as may be prescribed.
- 3.5.18 Due to the restrictions imposed by the 2020 Regulations (defined below), the Ministry of Housing, Communities and Local Government's (MHCLG's) guidance on procedural requirements for major infrastructure projects confirms that the requirement under Section 47(6)(za) of the Planning Act 2008 can now be met by making documents available for inspection online.
- 3.5.19 Chapter 6 of this report sets out how National Grid prepared its SoCC for the Statutory consultation and how National Grid carried out pre-application consultation in accordance with the final published SoCC, see section 6 of **Application Document 5.1.5 Appendix D SoCC**.

## Section 48 of the Planning Act 2008

- 3.5.20 Under Section 48 of the Planning Act 2008, the Proposed Project is required to be publicised in the "prescribed manner" in accordance with Regulation 4 of the APFP Regulations.
- 3.5.21 Regulation 4(2) of the APFP Regulations states that the Proposed Project is required to be publicised once in the London Gazette and a national newspaper and for at least two successive weeks in one or more local newspapers. This notice ('the Section 48 Notice') must include a number of details, including: explaining where and when the consultation documents can be viewed and setting out the deadline for the receipt of consultation responses (being not less than 28 days from the date when the notice was last published). As the Proposed Project is in-part an offshore development, National Grid was obliged under Regulation 4(2)(d) of the APFP Regulations to publish the Section 48 Notice in Lloyd's List and an appropriate fishing trade journal. Section 7.5 of this report provides a detailed overview of how National Grid publicised the Proposed Project pursuant to Section 48 of the Planning Act 2008 for the Statutory consultation.
- 3.5.22 In light of the above, Regulation 13 of the EIA Regulations states that where a project is an 'EIA development' National Grid must, at the same time as publishing the Section 48 Notice, send a copy of that notice to the consultation bodies and to any person notified to the application in accordance with Regulation 11(1)(c). Section 7.2 of this report provides details of how National Grid complied with Regulation 13 of the Regulations for the Statutory consultation and Section 9.2 for the Targeted consultation.

## Section 49 of the Planning Act 2008

- 3.5.23 Section 49 of the Planning Act 2008 requires National Grid to have regard to relevant responses received in response to consultation and publicity undertaken pursuant to Sections 42, 47 and 48 of the Planning Act 2008. A relevant response for the purposes of Sections 42, 47 and 48 is defined in Section 49(3) of the Planning Act 2008 as a response from a person consulted in accordance with the corresponding Section that is received by National Grid before the deadline is imposed.

- 3.5.24 Chapter 8 of this report provides an overview of the general themes derived from the relevant responses received during Statutory consultation under Sections 42, 47 and 48 of the Planning Act 2008 and commentary on how they were considered. Table 8.5 of this report provides a summary of the key design changes made following the Statutory consultation and the principal matters raised that did not result in a design change, respectively. Section 24 and 25 **Application Document 5.1.6 Appendix E Statutory consultation** provide extracts of the relevant responses received and National Grid's responses in accordance with Section 49 of the Planning Act 2008 for the Statutory consultation and the Planning Inspectorate's: Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024).
- 3.5.25 Chapter 9 of this report provides an overview of the general themes derived from the relevant responses received during Targeted consultation under Sections 42, 47 and 48 of the Planning Act 2008 and commentary on how they were considered. Table 9.11 of this report provides a summary of the key design changes made following the Targeted consultation and the principal matters raised that did not result in a design change, respectively. Section 17 and 18 of **Application Document 5.1.7 Appendix F Targeted consultation** provide extracts of the relevant responses received and National Grid's responses in accordance with Section 49 of the Planning Act 2008 for the Targeted consultation.

## Section 50 of the Planning Act 2008

- 3.5.26 Section 50 of Planning Act 2008 requires National Grid to have regard to government's pre-application guidance. Chapter 8 Sections 8.8, 8.9 and Table 8.7 provides an overview how National Grid had already completed non-statutory and statutory consultation before the new advice was published, therefore could not have full regard to the government's new guidance on the pre-application stage.

## The Infrastructure EIA Regulations 2017

- 3.5.27 The following provisions of the EIA Regulations are relevant to the Proposed Project:
- Regulation 8: Procedure for establishing whether EIA is required;
  - Regulation 10: Application for a scoping opinion;
  - Regulation 11: Procedure to facilitate preparation of environmental statements;
  - Regulation 12: Consultation statement requirements;
  - Regulation 13: Pre-application publicity under Section 48 (duty to publicise); and
  - Regulation 14: Submission of an environmental statement.
- 3.5.28 The Proposed Project falls under Paragraph 10(f) of Schedule 2 of the EIA Regulations and therefore constitutes an 'EIA development'. Although the consultation required under the EIA Regulations is separate to that required under the Planning Act 2008, which is the main focus of this report, Chapter 4 and Table 4.1 of this report summarises how National Grid has satisfied the relevant requirements of the EIA Regulations. **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation** explains in further detail the EIA scoping history of the Proposed Project and how regard has been had to comments received from the EIA scoping consultation.



## The APFP Regulations

- 3.5.29 The following provisions of the APFP Regulations are relevant to the Statutory consultation undertaken on the Proposed Project:
- Regulation 3: Prescribed consultees;
  - Regulation 4: Publicising a proposed application; and
  - Schedule 1: Circumstances when consultees must be consulted and notified about an application.
- 3.5.30 Chapter 7 and **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** summarise how National Grid has satisfied the relevant requirements of the APFP Regulations. Evidence of this compliance is also supplied in the appendices where relevant and appropriate.

## The 2020 Regulations

- 3.5.31 In light of the COVID-19 restrictions changes to certain publicity requirements were introduced through the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020. These changes came into force on 31 December 2020.
- 3.5.32 The 2020 Regulations amended certain requirements relating to the publication of notices and about how relevant documents are available for inspection. The 2020 Regulations remove the obligations on National Grid to include in relevant notices the addresses (including at least one address in the vicinity of the relevant project) where certain documentation is available for inspection. Instead, notices published must specify that the documents are available free of charge on a website, the address of the website and details of how the documents may be obtained from that website. National Grid is also required to provide a telephone number for general enquiries on where to find relevant information and on the documentation itself.
- 3.5.33 Furthermore, Sections 47 and 48 of the Planning Act 2008 require National Grid to place notices in local newspapers. The 2020 Regulations confirm that in circumstances where local newspapers are currently not available in print format, this requirement can be met by placing adverts in appropriate online local newspaper publications.

## Guidance and Advice Notes

- 3.5.34 **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** outlines where recommendations on the content of this report and the consultation process in the Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation (September 2024); and the Ministry of Housing, Community and Local Government (MHCLG) Advice Note: Nationally significant infrastructure projects: Advice on the consultation report (August 2024) have been complied with through the consultation process and addressed in this report.



## 4. Consultation Under the EIA Regulations

### 4.1 Introduction

- 4.1.1 Projects within the DCO regime are covered by the EIA Infrastructure Regulations 2017. An EIA is required for certain development under the EIA Regulations. As the Proposed Project is considered to fall within Schedule 1 of the EIA Regulations, an EIA is mandatory.
- 4.1.2 Regulation 14 of the EIA Regulations states that an application for an order granting development consent for EIA development (such as the DCO application National Grid is seeking) must be accompanied by an ES.
- 4.1.3 The consultation required under the EIA Regulations is separate from that required under the Planning Act 2008 which is the primary focus of this report. This chapter outlines the consultation undertaken by and on behalf of National Grid to satisfy the requirements of the EIA Regulations. **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology and Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation** explain in further detail how regard has been had to the comments received from the EIA scoping consultation.

### 4.2 2022 EIA Scoping Exercise

- 4.2.1 Early in the Proposed Project development process, a series of option appraisals and initial environmental and engineering studies were undertaken to inform the emerging design of the Proposed Project and the technical and environmental issues in need of consideration. These studies informed the EIA Scoping Report.

#### Regulation 8

- 4.2.2 Under Regulation 8(1)(b) of the EIA Regulations, an applicant is required to, inter alia, notify the SoS of its intention to submit an ES. In accordance with this, at the time of submitting the EIA Scoping Report to the Planning Inspectorate, the accompanying cover letter included formal notification to the SoS that National Grid proposed to provide an ES as part of its DCO application for the Proposed Project.
- 4.2.3 A copy of the cover letter accompanying the Scoping Opinion request and formal notification under Regulation 8(1)(b) is enclosed in section 1 of **Application Document 5.1.3 Appendix B EIA Scoping**.

#### EIA Scoping Opinion

- 4.2.4 In accordance with Regulation 10 of the EIA Regulations, an EIA Scoping Report (see section 1 and 2 of **Application Document 5.1.3 Appendix B EIA Scoping**) was submitted to the SoS via the Planning Inspectorate on 24 October 2022, along with a request for an EIA Scoping Opinion.
- 4.2.5 A Scoping Opinion was duly received on 01 December 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**). The Scoping Opinion sets

out the SoS's comments on the EIA approach and topic areas, as well as a list of all organisations consulted.

- 4.2.6 The Scoping Opinion 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**) included a list of all prescribed consultation bodies consulted by the Planning Inspectorate on behalf of the SoS as required by Regulation 11(1)(b) of the Infrastructure EIA Regulations 2017 and the SoS's comments on the EIA approach and topic areas, including confirmation of topics unlikely to have significant environmental effects.
- 4.2.7 Appendix 1 of the Scoping Opinion 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**) included a list of prescribed consultation bodies formally consulted by the Planning Inspectorate, as required by Regulation 11 of the Infrastructure EIA Regulations 2017 (the 'Regulation 11 list'), included: bodies prescribed under Section 42(1)(a) of the Planning Act 2008 and listed in column 1 of the table set out in Schedule 1 to the APFP Regulations and local authorities within Section 43 of the Planning Act 2008.
- 4.2.8 One non-prescribed consultation body pursuant to Regulation 11(1)(c) was identified to National Grid in the Regulation 11 list.
- 4.2.9 The Preliminary Environmental Information Report was based on the Scoping Opinion (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**). **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** and **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**, demonstrate how due consideration has been given to the Scoping Opinion.

## Summary of EIA Scoping Opinion Responses

- 4.2.10 The Scoping Opinion 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**) included a list of all stakeholders consulted, as required by Regulation 11 of the Infrastructure EIA Regulations 2017. In total, the Planning Inspectorate received 34 responses from the EIA Scoping Opinion consultation from the following bodies:
- Aldeburgh Town Council;
  - Aldringham-cum-Thorpe Parish Council;
  - Anglian Water;
  - Broads Authority;
  - Canterbury City Council;
  - Coal Authority;
  - Dover District Council;
  - East of England Ambulance Services NHS Trust;
  - East Suffolk Council;
  - Environment Agency;
  - Folkestone and Hythe District Council;
  - Forestry Commission;

- Friston Parish Council;
- Great Yarmouth Borough Council;
- Historic England;
- Joint Nature Conservation Committee;
- Kelsale-cum-Carlton Parish Council;
- Kent County Council;
- Leiston-cum-Sizewell Town Council;
- Marine Management Organisation;
- Maritime and coastguard Agency;
- Ministry of Defence;
- Natural England;
- Network Rail;
- Northern Gas Works;
- Office for Nuclear Regulation;
- Royal Mail;
- South Norfolk Council;
- Suffolk and North East Essex Integrated Care Board;
- Suffolk County Council;
- Surrey County Council;
- Thanet District Council;
- Theberton and Eastbridge Parish Council; and
- UK Health Security Agency.

4.2.11 The coordination of projects within Suffolk was a key theme which was adopted within the Planning Inspectorate's Scoping Opinion. Additionally, the Scoping Opinion 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**) identified key topics for the assessment of the Proposed Project as landscape and visual, water environment and geology and hydrogeology; for Kent key topics were ecology and biodiversity, water environment and geology and hydrogeology; and for the offshore scheme fish and shellfish ecology, benthic ecology and marine mammals were key topics.

4.2.12 **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** and **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**, demonstrate how due consideration has been given to the Scoping Opinion. The Scoping Opinion 2022 (see section 3 of **Application Document 5.1.3 Appendix B EIA Scoping**) has been considered in preparation of topic chapters in the Preliminary Environmental Information Report and the ES (see **Application Document Volume 6** of the DCO submission).

## Summary

- 4.2.13 This section provides an overview of the consultation undertaken by and on behalf of National Grid to satisfy the requirements of the EIA Regulations.
- 4.2.14 Table 4.1 provides a summary of how National Grid has complied with the relevant regulations of the Infrastructure EIA Regulations 2017 in its approach to consultation during the EIA process.

Table 4.1 Summary of compliance with the Infrastructure EIA Regulations 2017

| Regulation within the Infrastructure EIA Regulations 2017 | Requirement or provision of regulation                                                                                                                                          | How National Grid has complied                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regulation 8                                              | Notify the SoS that an ES will be submitted with the DCO Application.                                                                                                           | A request was made to the Planning Inspectorate (acting on behalf of the SoS) for a Scoping Opinion on 24 October 2022, which also notified the SoS that the application would be accompanied by an ES (see section 1 of <b>Application Document 5.1.3 Appendix B EIA Scoping</b> ).                                                                                                            |
| Regulation 10                                             | Applicant may request a Scoping Opinion from the SoS on the information that should be included within the ES.                                                                  | A scoping opinion was requested from the Planning Inspectorate (acting on behalf of the SoS) on 24 October 2022 (see section 1 of <b>Application Document 5.1.3 Appendix B EIA Scoping</b> ).                                                                                                                                                                                                   |
| Regulation 11                                             | Planning Inspectorate to notify the consultation bodies that National Grid intends to provide an ES for the Proposed Project.                                                   | The list of prescribed consultation bodies included in Appendix 1 of the Planning Inspectorate's Scoping Opinion (see section 3 of <b>Application Document 5.1.3 Appendix B EIA Scoping</b> ) was used to inform the prescribed bodies consulted under Section 42(a) during the Statutory consultation (see section 1 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b> ). |
| Regulation 12                                             | If a development is EIA development, the SoCC must state that fact and set out how National Grid intends to publicise and consult on the preliminary environmental information. | Section 1.1 of the SoCC (see section 6 of <b>Application Document 5.1.5 Appendix D SoCC</b> ) confirmed that the Proposed Project is an EIA development and explained how National Grid intended to publicise and consult on the Preliminary Environmental Information Report.                                                                                                                  |

| Regulation within the Infrastructure EIA Regulations 2017 | Requirement or provision of regulation                                                                      | How National Grid has complied                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regulation 13                                             | A copy of the Section 48 notice of the Planning Act 2008 must be sent to Regulation 11 consultation bodies. | <p>The Section 48 notice was sent to all Regulation 11 consultation bodies, including all Section 42(1)(a), (aa), (b) and (d) consultees on 20 October 2023 (for those who received Section 42 consultation documents by post via Royal Mail Special Delivery) and on 24 October 2023 (for those who received Section 42 consultation documents by email). Section 1 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b> outlines which consultees received Section 42 consultation documents by email and/or post.</p> <p>The Section 48 notice for Targeted consultation was sent to all Regulation 11 consultation bodies, including all Section 42(1)(a), (aa), (b) and (d) consultees on 05 July 2024 via Royal Mail and on 08 July 2024 (for those who received Section 42 consultation documents by email). Section 1 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b> outlines which consultees received Section 42 consultation documents and Table 9.1 provides a list of additional consultees identified for Targeted consultation.</p> |
| Regulation 14                                             | An application for an order granting development consent for EIA development must be accompanied by an ES.  | An ES has been prepared and submitted as part of the DCO application (see <b>Application Document Volume 6</b> of the DCO submission).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |



## 5. 2022 Non-Statutory Consultation

### 5.1 Introduction

- 5.1.1 This Chapter outlines the Non-statutory consultation undertaken by National Grid in 2022. The Non-Statutory Consultation Report (section 1 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) was published in October 2023 as part of the documentation for the Statutory consultation. Copies were available on the website, at deposit points and during the exhibitions held for the Statutory consultation. The Non-Statutory Consultation Report sets out a detailed account of the Non-statutory consultation including how it was carried out, the feedback received and how National Grid had regard to the feedback. A summary of that information is provided in the sections below.

### 5.2 Approach to Non-Statutory Consultation

#### Consultation Strategy

- 5.2.1 National Grid developed a consultation strategy (section 2 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) that set out how it intended to carry out pre-application Non-statutory consultation for the Proposed Project. The strategy was discussed and presented to local authorities. Representatives of Suffolk County Council, Kent County Council, Dover District Council, East Suffolk Council and Thanet District Council were consulted about the proposed approach to consultation. National Grid prepared two key documents designed to assist stakeholders in responding to the Non-statutory consultation. These were the Project Background Document (section 3 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) and the Corridor Preliminary Routeing and Siting Study (section 4 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**).

#### Consultation Zones

- 5.2.2 Prior to the Non-statutory consultation, National Grid developed a Primary Consultation Zone (PCZ) and a Secondary Consultation Zone (SCZ). These zones were geographical areas that sat within a certain distance from the Proposed Project footprint. The PCZ included properties that lay within a 1 km radius of the proposed underground cables and overhead line and 2 km around the proposed converter station sites. Where appropriate, the PCZ was extended to whole streets rather than dissecting hamlets or neighbourhoods.
- 5.2.3 The SCZ included properties that lay within a 4 km radius of the swathes that were proposed to be constructed on and, as with the PCZ, where appropriate, the SCZ was extended to whole streets rather than dissecting hamlets or neighbourhoods.
- 5.2.4 Chapter 3 of the Non-Statutory Consultation Report (section 1 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) provides information on how these two groups were consulted.

## Preparing for the Non-Statutory Consultation

- 5.2.5 The consultation was held over an eight-week period from 24 October to 18 December 2022. Whilst the consultation was open to all, the following groups were identified and contacted with an invitation to encourage participation:
- local residents and businesses within the vicinity of the Proposed Project;
  - local MPs, elected local authority and Parish Council representatives with wards in the vicinity of the Proposed Project;
  - statutory environmental bodies, including the Environment Agency, Natural England and Historic England;
  - relevant local authorities within the vicinity of the Proposed Project, including Kent County Council, Suffolk County Council, Dover District Council, East Suffolk Council and Thanet District Council;
  - landowners; and
  - other relevant organisations such as local interest groups, local emergency services, strategic traffic generators and hard to reach groups.
- 5.2.6 The consultation allowed National Grid to introduce the Proposed Project to the public, share initial plans and gather feedback on the options presented. It aimed to meet the following objectives:
- introduce the Proposed Project to the public and provide an overview;
  - explain why NGET need to build the reinforcement;
  - set out the options that have been considered and how NGET made the decision on the corridor and graduated swathe being proposed;
  - present NGET's proposed corridors with graduated swathe;
  - present NGET's proposed converter station sites;
  - present NGET's proposed marine route and cable landfall locations;
  - give stakeholders and members of the public the opportunity to provide feedback and have a greater influence on National Grid's work to date; and
  - outline next steps.
- 5.2.7 National Grid provided a number of ways for members of the public and those interested in the consultation to give their feedback. These were:
- completing an online feedback form (see section 6 **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) on the Proposed Project's website ([nationalgrid.com/sealink](https://nationalgrid.com/sealink)), see section 7 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**;
  - completing a paper feedback form (see section 6 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) or sending written comments by post;
  - emailing feedback to the Project's email address ([contact@sealink.nationalgrid.com](mailto:contact@sealink.nationalgrid.com)); and
  - calling the Proposed Project's information line.

- 5.2.8 During the Non-statutory consultation phase, National Grid made information available on the Proposed Project website and at deposit locations. Table 5.4 provides a list of deposit locations. The Non-statutory consultation information comprised:
- Project Background Document (see section 3 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**);
  - Newsletter (see section 5 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**); and
  - Feedback Forms for Suffolk and Kent (see section 6 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**).
- 5.2.9 National Grid also made the following technical background report available on the Proposed Project website during the Non-statutory consultation period:
- Corridor Preliminary Routeing and Siting Study Report (Oct 2022) (see section 4 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**).

## Consultation Activities

- 5.2.10 Table 5.1 summarises the range of methods used to advertise the public information events to the local community.

Table 5.1 Correspondence with local community and local representatives regarding the Non-statutory consultation

| Method            | Date          | Details                                                                                                                                                                                                                                                                                            |
|-------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Newsletter        | October 2022  | The Newsletter (see section 5 of <b>Application Document 5.1.4 Appendix C Non-Statutory Consultation</b> ) was distributed via post to all properties within the PCZ.                                                                                                                              |
| Project website   | October 2022  | Details of the Proposed Project and the Non-statutory consultation were provided on the Proposed Project website (see section 7 of <b>Application Document 5.1.4 Appendix C Non-Statutory Consultation</b> ). The webpage address was included in all information released into the public domain. |
| Social media      | November 2022 | A social media campaign was undertaken on Facebook and Instagram to promote the Non-statutory consultation and encourage people to attend an event or webinar (see section 8 of <b>Application Document 5.1.4 Appendix C Non-Statutory Consultation</b> ).                                         |
| Newspaper adverts | November 2022 | In Suffolk an advert was published in the Eastern Daily Press, the Anglian Daily Times and the Ipswich Star on 03 November 2022.                                                                                                                                                                   |

| Method | Date | Details                                                                                                                                                                                                                                                                                                                                                                  |
|--------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |      | <p>In Kent an advert was published in the Kentish Gazette on the 10 November 2022 and the Kent and Sussex Courier on 11 November 2022.</p> <p>The Kent advert was also published in the Fishing News on the 09 November 2022.</p> <p>Section 9 of <b>Application Document 5.1.4 Appendix C Non-Statutory Consultation</b> contains a copy of all the advertisements.</p> |

- 5.2.11 National Grid held six public information events at local venues in November 2022. The Non-statutory public information events provided the opportunity for National Grid to present and explain the project and to speak to experts within National Grid's team.
- 5.2.12 National Grid selected venues for the public information events at convenient locations in proximity to the Proposed Project and with good transport access to give the local community the greatest possible opportunity to attend. Choosing accessible consultation venues helped to promote equality of opportunity for all who wished to partake, thus supporting one of the aims of the Equality Act 2010 (see **Application Document 7.9 Equalities Impact Assessment** for further details). Table 5.2 provides details of the public information events.

Table 5.2 Non-statutory consultation public information events

| Date       | Time         | Venue                                                                                       | Attendance |
|------------|--------------|---------------------------------------------------------------------------------------------|------------|
| 10.11.2022 | 1 pm – 8 pm  | Old Generator Station, King's Field, Aldeburgh, Suffolk, IP15 5HY                           | 500+       |
| 11.11.2022 | 1 pm – 8 pm  | Friston Village Hall, Church Road, Friston, Suffolk, IP17 1PU                               | 164        |
| 12.11.2022 | 10 am – 5 pm | Fromus Centre, The Saxmundham Hub, Block E, Street Farm Road, Saxmundham, Suffolk, IP17 1AL | 104        |
| 17.11.2022 | 9 am – 4 pm  | Guildhall, Cattle Market, Sandwich, Kent, CT13 9AE                                          | 25         |
| 18.11.2022 | 1 pm – 8 pm  | Newington Community Centre, Princess Margaret Avenue, Ramsgate, Kent, CT12 6HX              | 7          |
| 19.11.2022 | 10 am – 5 pm | Cliffsend Village Hall, 55 Foads Lane, Cliffsend, Ramsgate, Kent, CT12 5JH                  | 26         |

- 5.2.13 National Grid hosted a series of stakeholder briefings during the Non-statutory consultation period. Table 5.3 provides details of the stakeholder briefings.

Table 5.3 Non-statutory consultation stakeholder briefings

| Date       | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 18.10.2022 | A stakeholder briefing was held with Kent County Council at 9:30am on Microsoft Teams. Questions were raised regarding the size, scale and visual impact of the proposed converter station as well as environmental impacts.                                                                                                                                                                                                                                                                                                                     |
| 19.10.2022 | A stakeholder briefing was held with Suffolk County Council at 9am via Microsoft Teams. Discussions concerned levels of engagement with Town and Parish Councils, support for coordination with other offshore projects and opposition to Site 1 emerging preference due to visual impact.                                                                                                                                                                                                                                                       |
| 24.10.2022 | A stakeholder briefing was held with Thanet District Council at 6pm via Google Meet. Questions raised concerned the size of the converter station, environmental impact, disruption due to construction and a preference to host infrastructure offshore.                                                                                                                                                                                                                                                                                        |
| 25.10.2022 | A stakeholder briefing was held with East Suffolk Council at 5pm via Microsoft Teams. Discussion concerned a greater need for coordination with EuroLink, (now known as LionLink) a Holistic Network Design review and a preference to host infrastructure offshore or at brownfield sites. Consideration for local wildlife and issues with transparency over the inclusion of the proposed Friston substation were also discussed.                                                                                                             |
| 31.10.2022 | A political briefing was held with Suffolk Parish Councils at 6pm via Microsoft Teams. The size and scale of infrastructure, cumulative impacts of proposed energy projects, local environmental impact, and a lack of trust over the planning were discussed. A preference for siting infrastructure at brownfield sites and/or offshore was also raised.                                                                                                                                                                                       |
| 03.11.2022 | A stakeholder briefing was held with Suffolk Energy Action Solutions (SEAS) at 3pm via Microsoft Teams. Discussions concerned the impact of the Proposed Project on the tourism economy, coastline, local environment and rural road network. There was reference to the use of offshore and/or brownfield sites for the Proposed Project and the implications of the Friston substation judicial review.                                                                                                                                        |
| 03.11.2022 | A members briefing was held with Suffolk Parish Councils at 6pm via Microsoft Teams. Discussions were held on the size and scale of infrastructure, and the implications of the Friston substation judicial review. A preference for siting infrastructure at brownfield sites and/or offshore was expressed. There was also a request for further information about the consultation methods and survey methods used so far, linked to concerns that the team does not know the area and so has produced inappropriate plans for the landscape. |
| 07.11.2022 | A members briefing was held with Suffolk Parish Councils at 1pm via Microsoft Teams. Discussions concerned were the cumulative impact of energy projects on the local community and environment, with support given for coordination and colocation to reduce the infrastructure footprint and impact during construction. Questions were also raised as-to why there was a concentration of projects proposed in East Anglia, rather than across the UK.                                                                                        |

| Date       | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 29.11.2022 | A stakeholder briefing was held with Substations Action Save East Suffolk (SASES) at 1pm via Microsoft Teams. SASES are a group which campaigns against energy projects being developed in Suffolk. Questions were raised over the need for the Proposed Project and the judicial review of the consent for Friston substation. Concerns were also raised over the size of the cable swathes and trenches when considering potential coordination with EuroLink and Nautilus. It was stated that care needs to be taken when conducting consultations and evaluations of the area.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 08.12.2022 | A stakeholder briefing was held with Suffolk County Council and East Suffolk Council via Microsoft Teams. The briefing formed part of the monthly project catch-up meeting. During the discussion, National Grid reiterated that the close of consultation would be on Sunday 18 December 2022. It was explained that there had been 3,616 website visitors during Non-statutory consultation (up to 6 December) and that PCZs and SCZs were identified for the purpose of Non-statutory consultation, with 11,061 addresses written to in Suffolk. A summary of engagement with other interested parties was given including member briefings, Parish and Town Councils, MPs, campaign groups (SEAS and SASES), and landowners. Furthermore, a summary was provided for in-person consultation events held on consecutive weekends in Suffolk (10-12 November) with 750+ visitors in Suffolk (including Therese Coffey MP), LPA site visits held with Suffolk (10 November) and six public webinars. |
| 14.12.2022 | A stakeholder briefing was held with the three host authorities in the Kent area via Microsoft Teams. The briefing formed part of the monthly project catch-up meeting. During the discussion, National Grid reiterated that the close of consultation would be on Sunday 18 December 2022, whilst advising that some extensions to the response period had been agreed. It was noted that 6,000 individual addresses had been contacted in Kent, that MP Roger Gale from the neighbouring area was seeking to engage, that in-person consultation events had been hosted between 17-19 November with 58 attendees, and that key concerns highlighted in consultation responses received to date include noise, road impacts during construction, impacts on tourism and golf course impacts, and LPA site visits also held with Kent (17 November).                                                                                                                                                  |

- 5.2.14 National Grid presented information relating to the Proposed Project in a variety of formats at the public information events and stakeholder briefings. The information presented at the public information events comprised: Project Background Document (see section 3 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**), Newsletter (see section 5 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**), Feedback Forms (Suffolk and Kent) (see section 6 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) and exhibition banners (see section 10 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**).
- 5.2.15 Many members of the Proposed Project team, including technical experts, attended the public information events to gather feedback on the Proposed Project and were available to answer questions from members of the public. The Feedback Forms were



available for attendees to complete at the public information events or to return via Freepost to National Grid by 18 December 2023. Responses on the following aspects were sought:

- views on landfall locations;
- views on proposed cable corridors;
- views on proposed converter site locations;
- views on co-location of (up to three) converter stations;
- views on overhead lines or underground cables;
- views on marine corridors; and
- any other areas of concern/comments.

- 5.2.16 National Grid invited feedback to be submitted via the online feedback forms, by email or by Freepost.
- 5.2.17 National Grid placed copies of the key consultation materials including the Project Background Document, Newsletter and Feedback Forms in local deposit venues. The consultation material was available during the consultation period (24 October 2022 to 18 December 2022). Hearing loops and large print versions of the brochure were also made available to enhance accessibility for individuals with hearing or sight difficulties. Table 5.4 provides details of the local deposit venues; there were seven in Suffolk and twelve in Kent.

**Table 5.4 Non-statutory consultation deposit point locations**

| <b>Location</b>                  | <b>Address</b>                                              |
|----------------------------------|-------------------------------------------------------------|
| <b>Suffolk</b>                   |                                                             |
| Aldeburgh Library                | Victoria Rd, Aldeburgh, Suffolk, IP15 5EG                   |
| Aldeburgh Town Council           | Moot Hall, Market Cross Place, Aldeburgh, Suffolk, IP15 5DS |
| Aldeburgh Co-op                  | 117 High St, Aldeburgh, Suffolk, IP15 5AR                   |
| Leiston Co-op                    | Sizewell Rd, Leiston, Suffolk, IP16 4AE                     |
| Leiston Library and Town Council | Main St, Leiston, Suffolk, IP16 4ER                         |
| Saxmundham Library               | Block B, Street Farm Rd, Saxmundham, Suffolk, IP17 1AL      |
| Saxmundham Town Council          | Station Approach, Saxmundham, Suffolk, IP17 1BW             |
| <b>Kent</b>                      |                                                             |
| Ash Library                      | 11 Queen's Rd, Ash, Canterbury, Kent, CT3 2BG               |
| Broadstairs Library              | The Broadway, Broadstairs, Kent, CT10 2BS                   |
| Birchington Library              | 17 Alpha Rd, Birchington, Kent, CT7 9EG                     |

| Location                  | Address                                                   |
|---------------------------|-----------------------------------------------------------|
| Cliftonville Library      | Queen Elizabeth Ave, Cliftonville, Margate, Kent, CT9 3JX |
| Deal Town Council         | High St, Deal, Kent CT14 6TR                              |
| Margate Library           | Thanet's Gateway Plus, Cecil St, Margate, Kent, CT9 1RE   |
| Minster-in-Thamet Library | 4a Monkton Rd, Minster, Ramsgate, Kent, CT12 4EA          |
| Newington Library         | Marlowe Academy, Marlowe Way, Ramsgate, Kent, CT12 6NB    |
| Ramsgate Library          | Guildford Lawn, Ramsgate, Kent, CT11 9AY                  |
| Sandwich Library          | 13 Market St, Sandwich, Kent, CT13 9DA                    |
| Walmer Town Council       | 62 The Strand, Walmer, Deal, Kent, CT14 7DP               |
| Westgate Library          | Minster Rd, Westgate-on-Sea, Kent, CT8 8BP                |

5.2.18 National Grid held six one-hour webinar events during the Non-statutory consultation. During the webinars, presentations were given providing a general overview of the Proposed Project followed by an open question and answer session. Table 5.5 provides details of the webinars.

Table 5.5 Non-statutory webinars

| Date       | Time      | Webinar title          | Attendees |
|------------|-----------|------------------------|-----------|
| 22.11.2022 | 6pm – 7pm | Proposals in Suffolk   | 28        |
| 23.11.2022 | 6pm – 7pm | Proposals in Kent      | 12        |
| 24.11.2022 | 6pm – 7pm | Marine Route Proposals | 11        |
| 29.11.2022 | 6pm – 7pm | Proposals in Suffolk   | 25        |
| 30.11.2022 | 6pm – 7pm | Proposals in Kent      | 6         |
| 01.12.2022 | 6pm – 7pm | Marine Route Proposals | 4         |

## Engagement with Landowners

5.2.19 A desktop referencing exercise was undertaken for all route options; however, contact referencing to confirm the records was not undertaken at this stage. Once the options were refined, contact referencing commenced.

5.2.20 During Non-statutory consultation, in addition to the main stakeholder engagement events described above, there were two landowner-focused events. For these events, written invitations were sent to all contacts identified via the desktop referencing exercise. These events were as follows:

- Suffolk – 02 November 2022; and

- Kent – 16 November 2022.

## 5.3 Non-Statutory Consultation Feedback

- 5.3.1 This section summarises the key findings of the Non-statutory consultation. A total of 340 feedback forms were received for Suffolk and 120 for Kent. Furthermore 262 emails and 19 calls to the freephone number were received. A full table of the findings and a more detailed summary of the responses together with National Grid's response can be found in Chapters 4, 5 and 6 of the Non-Statutory Consultation Report (see section 1 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**).
- 5.3.2 The feedback from Aldeburgh Town council, although received, was not processed along the same timescale as the other feedback and accordingly was not reflected in the Non-Statutory Consultation Report. However, the themes raised in the Aldeburgh Town Council response were reflected by other respondents whose feedback was reported in the Non-Statutory Consultation Report, and regard was had to these themes in the evolution of the Proposed Project. Furthermore, the Aldeburgh Town Council Non-statutory feedback was re-considered as part of ongoing back checking as the Proposed Project progressed. The Aldeburgh Town Council Non-statutory consultation feedback, alongside further feedback received at the later Statutory consultation stage (discussed in Chapter 7) had been thoroughly reviewed and taken into account.
- 5.3.3 A number of issues and concerns were raised during the Non-statutory consultation. Table 5.6 outlines how National Grid sought to address these issues in developing the preferred design option to be taken forward for the Statutory consultation.

Table 5.6 Issues and concerns raised during the Non-statutory consultation and National Grid's response

| Issue/Concern                                                                                                                                                                                                                  | Regard had by National Grid                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Needs case:</b><br>Whilst some respondents supported principles of the Proposed Project, namely de-carbonisation of energy supply, others felt the needs case of such a major project in the proposed location was unclear. | National Grid acknowledged this comment and confirmed the needs case for the Proposed Project will be concisely summarised in the Project Overview Document.                                                                                                                                                                                                                                                                                                                                |
| <b>Converter station location:</b><br>Satisfactory consideration of the use of brownfield sites for the converter station in Suffolk.                                                                                          | National Grid was unable to find any brownfield sites within the converter station option area that are suitable for the infrastructure proposed. All existing National Grid substations in the area are already at capacity or do not have the space around them to allow the connection required by this Proposed Project.<br><br>Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for |

| Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Regard had by National Grid                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Develop the entire Project offshore:</b></p> <p>Many respondents felt that the development of an “offshore modular grid” through the North Sea corridor, would avoid damage to rural areas, the Area of Outstanding Natural Beauty<sup>2</sup> (AONB) and numerous SSSIs and nature reserves.</p>                                                                                                                                                        | <p>natural screening and to minimise visual impacts on settlements.</p> <p>The Proposed Project proposal includes approximately 130 km of subsea cables between Sizewell area in East Suffolk and Richborough in Kent. At landfall, the cables would go underground to a converter station (one at each end).</p> <p>National Grid stated that it is continuing to work with other developers to explore opportunities for offshore co-ordination. However, National Grid was not in a position to share any further details at this time.</p> <p>National Grid pointed out that it should be noted that any offshore co-ordination does not remove the need for the Proposed Project to reinforce the EC5 and EC6 network boundaries, ensuring it is able to safely cope with the planned increase in generation in this area. This means the requirement for onshore infrastructure in this area will still remain.</p>                                                                                                                                                |
| <p><b>Coordination of all projects in East Suffolk:</b></p> <p>Many respondents expressed the view that all major energy projects underway in the Suffolk area should be coordinated in order to minimise cumulative impacts. Concerns about coordination were regarding the potential need for a significant amount of land to host coordinated infrastructure, and the national security risk posed from the concentration of energy supply in one area.</p> | <p>National Grid stated it was working closely with other developers in the area to consider opportunities for coordination between projects and was not at a position to share information. A joint-working group was established with an agreed set of coordination principles to guide project decision making to:</p> <ul style="list-style-type: none"> <li>• explore possible opportunities for co-location of onshore infrastructure;</li> <li>• minimise impacts on local infrastructure and the environment; and</li> <li>• share information and data where appropriate to support mutual refinement.</li> </ul> <p>It was stated that coordinating projects could allow National Grid to reduce impacts of construction on areas that host new infrastructure, while connecting low carbon, renewable energy and meeting Government’s target to decarbonise their energy system. National Grid’s Project teams explored opportunities to collaborate wherever possible, despite the challenges this presented from regulatory and programme perspectives.</p> |

<sup>2</sup> It is acknowledged that an Area of Outstanding Natural Beauty is now known as a National Landscape. Where a respondent has specifically mentioned an AONB, the designation has not been altered to National Landscape.

| Issue/Concern                                                                                                                                                                                                                                                                                                                                                                  | Regard had by National Grid                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                | <p>National Grid pointed out that it should be noted that any offshore co-ordination does not remove the need for the Proposed Project to reinforce the EC5 and EC6 network boundaries, ensuring it is able to safely cope with the planned increase in generation in this area. This means the requirement for onshore infrastructure in this area will still remain.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>Development within AONBs:</b></p> <p>Many respondents expressed their interest in maintaining East Suffolk's Heritage Coastline, AONB, and protected landscapes including heathland, forest, and acid grassland. Some respondents were concerned about whether the appearance and height of the proposed infrastructure would visually impact the natural landscape.</p> | <p>National Grid confirmed that the likely impacts of the Proposed Project on Areas of Outstanding Natural Beauty (now known as Historic Landscapes) would be assessed. Further details are provided in <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> submitted with the DCO application.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Development within designated wildlife sites such as Sites of Special Scientific Interest (SSSI):</b></p> <p>Wetlands, woodland and the general Aldeburgh area were deemed particularly ecologically sensitive by respondents, home to a range of birdlife, amphibians and other wildlife that they stated must be protected.</p>                                        | <p>National Grid confirmed that the likely impacts of the Proposed Project on biodiversity would be assessed. Further details are provided in <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b> submitted with the DCO application.</p> <p>National Grid stated that it aims to achieve a 10% Biodiversity Net Gain (BNG) in all of its major projects. Initially, the implementation of the mitigation hierarchy will be demonstrated through the avoidance of certain habitats, the use of environmental constraints, and integrated mitigation measures to minimize habitat loss and other impacts during construction. The final assessment will determine the extent to which BNG can be delivered on site or off site and the mechanisms for delivery.</p> <p>A BNG assessment will be conducted by comparing the biodiversity value of habitats at the site before and after the development. The assessment will consider the "baseline" biodiversity value of habitats prior to the development and the "post-development" biodiversity value of habitats after the completion of the development. To attain BNG, the post-development biodiversity unit score must be higher than the baseline score. Further details are provided in <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report</b> submitted with the DCO application.</p> |

| Issue/Concern                                                                                                                                                                                                                                                                                                                                                                      | Regard had by National Grid                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Impact on tourism in Suffolk:</b></p> <p>Concerns regarding the impacts of construction and development on tourism in East Suffolk were raised, citing the area's natural landscape and coastline as a significant attraction for visitors, as well as The Aldeburgh Festival.</p>                                                                                           | <p>National Grid confirmed that the likely impacts of the Proposed Project on tourism would be assessed. Further details are provided in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b> submitted with the DCO application.</p>                                                                                          |
| <p><b>Impact of construction traffic:</b></p> <p>Concerns were raised about the accumulation of construction traffic from coinciding energy projects proposed in the Suffolk area. Existing road structure including hazardous junctions, narrow roads, and aged structures were raised by respondents as reasons why it is unsuitable for construction traffic and transport.</p> | <p>National Grid confirmed that the likely impacts of the Proposed Project on local traffic flows would be assessed. Further details are provided in <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> submitted with the DCO application.</p>                                                                                                  |
| <p><b>Impact on buildings and sites of cultural and archaeological interest:</b></p> <p>Some respondents raised concerns about the impacts of Proposed Project development on areas of cultural heritage and archaeology, particularly the Heritage Coast, World War Two related historical sites, listed buildings and farms, and Roman and medieval sites.</p>                   | <p>National Grid confirmed that the likely impacts of the Proposed Project on local sites of cultural heritage and archaeological importance would be assessed as part of the ES <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage and Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage</b> submitted with the DCO application.</p> |
| <p><b>Cumulative impacts:</b></p> <p>Several respondents stated that the full cumulative impacts of the Proposed Project should be assessed in combination with other consented and planned developments in the area, together with a comprehensive package of mitigation measures where avoidance of impacts is not possible.</p>                                                 | <p>National Grid confirmed that the likely cumulative impacts of the Proposed Project would be assessed. Further details are provided in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects</b> submitted with the DCO application.</p>       |

## 5.4 Changes Made Following Feedback Received During the Non-Statutory Consultation

- 5.4.1 National Grid analysed the responses to the Non-statutory consultation to inform its design and preferred options for the Proposed Project to take forward for preliminary design. The proposals developed following the Non-statutory consultation are set out in the following paragraphs.



## Suffolk

- 5.4.2 In Suffolk, the landfall location at Aldeburgh/Thorpeness together with a converter station at Site 3 were selected as the preferred option. These are depicted in Plate 5.1, together with the discounted options.



Plate 5.1 Suffolk proposals following Non-statutory consultation

- 5.4.3 There are fewer technical challenges associated with constructing a converter station and associated underground cables at Site 3 than Site 1. Converter station site 3 is also further away from the Suffolk Coasts and Heaths AONB (now known as Suffolk & Essex Coast & Heaths National Landscape). There is direct access to Site 1 from the existing road network whereas Site 3 would require an off-highway network access to be created to avoid routing construction traffic through the settlement of Saxmundham. Site 1 is more spatially constrained due to the location of existing woodland within the site; therefore, Site 3 would provide more potential to microsite the converter station of co-location with other projects. Site 1 would also likely require more earthworks due to the slightly steeper gradient on the site.
- 5.4.4 Overall, Site 3 would require a longer cable route and temporary land take. There would be more potential for temporary effects on more receptors for Site 3 than Site 1 and more potential for physical impacts on unknown or unrecorded archaeology due to the additional length. Site 1, however, would require a longer length of HVAC cable than Site 3 which has a wider construction swathe.

- 5.4.5 Although both sites could accommodate co-location with up to two converter stations associated with potential future NGVs projects, Site 3 was considered to offer the greatest flexibility for co-location.
- 5.4.6 On balance, overall Site 3 was identified as the preferred option for the Suffolk Onshore Scheme.
- 5.4.7 The landfall location between Aldeburgh and Thorpeness, rather than a landfall at Sizewell, was selected. The potential landfall at Sizewell is more constrained by existing telecommunications cables, export cables for offshore windfarms and infrastructure associated with the existing Sizewell B nuclear power station and the planned Sizewell C nuclear power station and Scottish Power Renewables offshore windfarms. The potential landfall at Sizewell is also more constrained by the sensitive bedrock reef of the Coralline Crag. The Coralline Crag is a rocky seabed formed of shelly sands in an area of shallow water off the coast of Thorpeness, which helps provide stability to areas of the coast and to offshore sediment banks. Additionally, the landfall between Aldeburgh and Thorpeness allows for the potential co-location of up to two other cable corridors associated with potential future NGVs projects.
- 5.4.8 The proposed Friston substation was included in the proposals, to give a comprehensive consenting position. However, it is expected that the proposed Friston substation will be built under the existing Scottish Power Renewables consents. A gas insulated switchgear substation is proposed, which has a smaller footprint than the alternative air insulated version. This aligns with what is expected from Scottish Power Renewables to deliver. The 50 m additional substation footprint is no longer proposed.

## Offshore

- 5.4.9 A single marine corridor from Suffolk to Kent was proposed, which connects to the proposed landfall between Aldeburgh and Thorpeness in Suffolk, removing the alternative northern option which connected to the discounted landfall at Sizewell (see Plate 5.2).

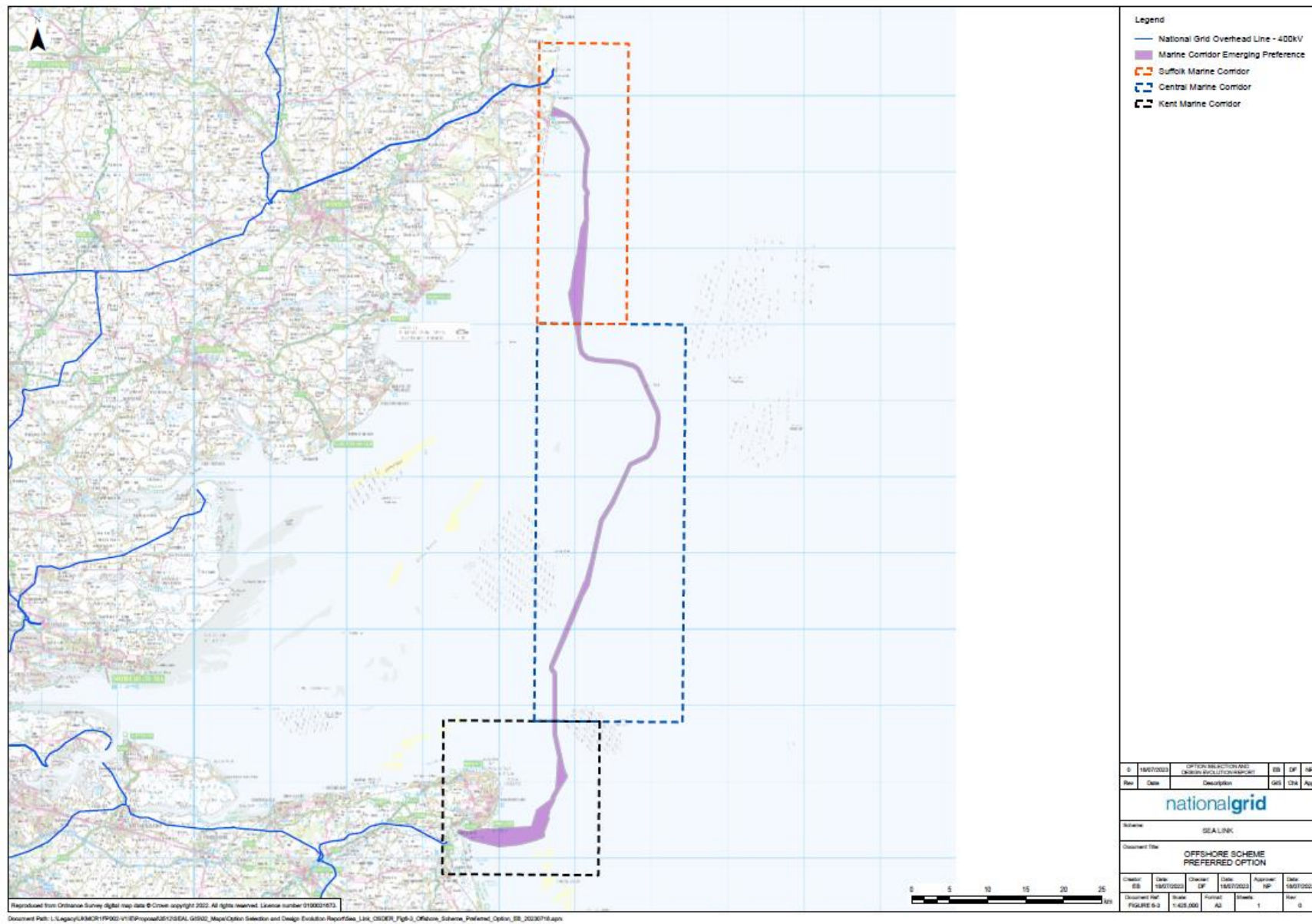


Plate 5.2 Offshore scheme preferred option

## Kent

- 5.4.10 Plate 5.3 shows the proposals for Kent. There are environmental and technical constraints and opportunities associated with both overhead lines and underground cables. Due to the ground conditions and requirement for trenchless crossings, it is likely that the underground cable option would have greater temporary impacts during construction than the overhead line option.
- 5.4.11 Both options would require permanent above ground infrastructure; the overhead line option has a greater potential for permanent impacts on landscape character, setting of historical assets and bird collision risk. The underground option would require a permanent compound within Flood Zones 2 and 3 and more potential for physical impacts on non-designated heritage assets and a greater amount of permanent habitat loss.
- 5.4.12 On balance, the overhead line option has been identified as the preferred option for the Kent Onshore Scheme as it avoids the need to site a permanent compound within Flood Zones 2 and 3, technical constraints associated with construction and reducing impacts in relation to the potential for physical impacts on non-designated heritage assets, and a greater amount of permanent habitat loss. The potential for greater landscape and visual setting and bird collision risk from the overhead line option are recognised and have been, and will continue to be, considered and reduced as much as possible through the development of the design of the Proposed Project and the inclusion of mitigation such as bird diverters where required.

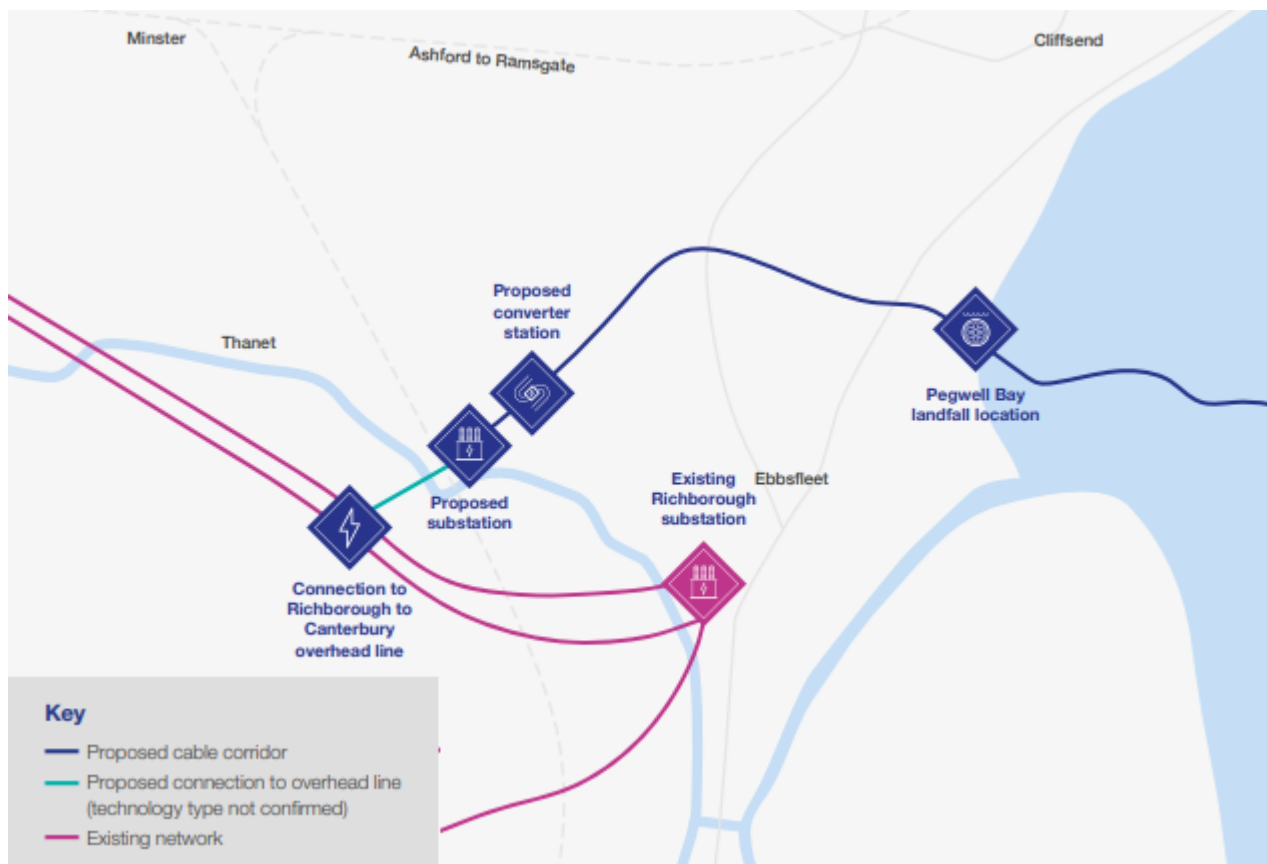


Plate 5.3 Kent proposals following Non-statutory consultation

## 5.5 Summary of Ongoing Engagement

- 5.5.1 National Grid has sought to engage with stakeholders throughout the development of the Proposed Project including outside of the Non-statutory consultation period. This informal or Non-statutory engagement has been undertaken through various mechanisms and has sought to keep key stakeholders informed about the progress of the Proposed Project, inform the ongoing design of the Proposed Project and enable timely discussions on opportunities and concerns identified.
- 5.5.2 Chapter 3 of this report explains National Grid's approach to Non-statutory engagement undertaken before, during and after the Non-statutory consultation period.

## 6. Statement of Community Consultation

### 6.1 Introduction

- 6.1.1 This Chapter provides details of how the SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) was prepared, consulted on and published in line with Section 47 of the Planning Act 2008 prior to commencing the Statutory consultation for the Proposed Project.

### 6.2 SoCC Rationale

- 6.2.1 The purpose of the SoCC was to set out how National Grid would consult with the local communities likely to be affected by the Proposed Project and then carry out the Statutory consultation in accordance with the final published SoCC, see section 6 of **Application Document 5.1.5 Appendix D SoCC**. It set out a consultation methodology that was effective and appropriate to the local context, and which fully complied with the statutory requirements and government guidance on pre-application consultations for DCOs.

### 6.3 Consultation on the Draft SoCC

- 6.3.1 Section 47(2) of the Planning Act 2008 states that National Grid must consult each local authority that is within Section 43(1) about the content and format of a SoCC. Kent County Council, Suffolk County Council, Dover District Council, East Suffolk Council and Thanet District Council are the relevant Section 43(1) host local authorities in relation to the Proposed Project (hereafter referred to as 'the host authorities' in this chapter). National Grid also consulted the Marine Management Organisation on a non-prescribed basis due to the offshore element of the Proposed Project. National Grid has had regard to the consultation feedback received from the host authorities.
- 6.3.2 As described in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**, National Grid has had regard to Paragraphs 35 to 42 of the DCLG pre-application guidance in undertaking the consultation on the content of the SoCC. It is acknowledged that this guidance has been superseded by guidance on the pre-application stage for Nationally Significant Infrastructure Projects (published by the Department for Levelling Up, Housing and Communities, April 2024). The 2024 Guidance was followed for Targeted consultation.
- 6.3.3 National Grid discussed the approach to Statutory consultation with the following host authorities as part of their regular monthly meetings:
- Suffolk County Council and East Suffolk Council – 08 June 2023;
  - the Marine Management Organisation – 12 June 2023; and
  - Kent County Council, Dover District Council and Thanet District Council – 13 June 2023.



## Statutory Consultation on the SoCC

- 6.3.4 The draft SoCC was sent to the host authorities by email for Statutory consultation on 22 June 2023. A copy of the draft SoCC can be found at section 1 of **Application Document 5.1.5 Appendix D SoCC**.
- 6.3.5 It was requested that the host authorities respond by 20 July 2023, giving a 28-day response period from the day after receipt of the draft SoCC, allowing the minimum period as required by Section 47(3) of the Planning Act 2008. A copy of the covering email sent to the host authorities is provided in section 2 of **Application Document 5.1.5 Appendix D SoCC**.
- 6.3.6 National Grid received individual relevant responses on the draft SoCC (see section 1 of **Application Document 5.1.5 Appendix D SoCC**) from the following bodies:
- Thanet District Council – 04 July 2023;
  - the Marine Management Organisation – 06 July 2023;
  - Kent County Council – 19 July 2023;
  - Suffolk County Council – 19 July 2023;
  - Dover District Council – 20 July 2023; and
  - East Suffolk Council – 20 July 2023.
- 6.3.7 Section 3 of **Application Document 5.1.5 Appendix D SoCC** provides a copy of the responses received and Section 4 provides National Grid's regard had.

## 6.4 Adhering to the Commitments in the SoCC

- 6.4.1 Section 5 of **Application Document 5.1.5 Appendix D SoCC** provides details of how the Statutory consultation was undertaken in line with the commitments outlined in the final SoCC, see section 6 **Application Document 5.1.5 Appendix D SoCC**.

## Publication of the SoCC

### SoCC content

- 6.4.2 The published SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) set out:
- details about the Proposed Project;
  - key consultation activities and dates;
  - that the Proposed Project is EIA development, and how National Grid was publishing preliminary environmental information relating to the Proposed Project;
  - how National Grid was going to consult local people and communities about the Proposed Project and what activities would be undertaken to give them access to information about the proposals; and
  - how people could provide feedback to National Grid from the consultation activities and ensure that they are informed about the Proposed Project.

## Statutory consultation target area

- 6.4.3 The SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) explains that National Grid developed two consultation zones as follows:
- PCZ which extends 3 km from the proposed draft Order Limits for the Proposed Project onshore; and
  - SCZ which extends to at least 5 km from the draft Order Limits for the Proposed Project (including the PCZ) onshore.
- 6.4.4 National Grid focused its primary consultation activities, for example Consultation Pack (to include a newsletter, feedback form and freepost envelope), within the PCZ consultation target area and carried out less intensive consultation activities, for example media coverage, within the SCZ and wider area outside of the consultation zones.
- 6.4.5 A map of the PCZ and SCZ target areas is provided in Appendix A of the final SoCC, section 6 of **Application Document 5.1.5 Appendix D SoCC**.

## Publicity under Section 47 of the Planning Act 2008

- 6.4.6 The final SoCC, which took account of the comments received from relevant host authorities, was published online on 24 October 2023. A copy of the final SoCC, as published, can be found in section 6 of **Application Document 5.1.5 Appendix D SoCC**.
- 6.4.7 The SoCC was made available for viewing online for the duration of the Statutory consultation via National Grid's dedicated Proposed Project webpage and the deposit locations (see Section 7.4 of Chapter 7 of this report).
- 6.4.8 The SoCC Section 47 Notice (see section 7 of **Application Document 5.1.5 Appendix D SoCC**) confirmed that the SoCC was available to view online, free of charge, and provided National Grid's contact details for enquiries. National Grid's dedicated Proposed Project webpage also clearly sets out National Grid's contact details for enquiries. This approach is consistent with the MHCLG's guidance on procedural requirements for major infrastructure projects (December 2020) and the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 which confirm that the requirement under Section 47(6)(za) of the Planning Act 2008 can be met by making documents available for inspection online.
- 6.4.9 Paper copies of the SoCC were made available, upon request, free of charge throughout the Statutory consultation period (24 October 2023 to 18 December 2023).
- 6.4.10 Pursuant to Section 47(6) of the Planning Act 2008, a notice relating to where and when the published SoCC was available to be viewed was published in local newspapers, as described in Table 6.1, see section 7 of **Application Document 5.1.5 Appendix D SoCC**. This notice also included an outline explanation of the Proposed Project proposals and how to get in touch with any questions.

Table 6.1 Newspapers where the SoCC Section 47 notice was published

| Publication              | Date of notice  |
|--------------------------|-----------------|
| East Anglian Daily Times | 17 October 2023 |

| Publication     | Date of notice  |
|-----------------|-----------------|
| Kentish Gazette | 19 October 2023 |

## 6.5 Summary

6.5.1 The overarching timetable for the preparation of the SoCC is summarised in Table 6.2.

Table 6.2 Timetable for the preparation of the SoCC

| Date                               | Milestone                                                                                                                                                                                                                                                                                                          |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22 June 2023                       | Draft SoCC issued to host authorities for SoCC Statutory consultation. A copy of the draft SoCC can be found in section 1 of <b>Application Document 5.1.5 Appendix D SoCC</b> and the covering emails issued to host authorities can be found in section 2 of <b>Application Document 5.1.5 Appendix D SoCC</b> . |
| 22 June 2023                       | Start of Statutory consultation on draft SoCC with the host authorities.                                                                                                                                                                                                                                           |
| 20 July 2023                       | Deadline for submission of statutory comments from host authorities to National Grid on the draft SoCC.                                                                                                                                                                                                            |
| 20 July 2023 to 02 October 2023    | Draft SoCC updated in light of comments received and finalised for publication (see section 4 of <b>Application Document 5.1.5 Appendix D SoCC</b> of this report for a summary of the responses on the draft SoCC and National Grid's regard had).                                                                |
| 17 October 2023 to 19 October 2023 | SoCC Section 47 Notice published in two local newspapers – East Anglian Daily Times and Kentish Gazette (see section 7 of <b>Application Document 5.1.5 Appendix D SoCC</b> ). Table 6.1 of this report provides details.                                                                                          |
| 24 October 2023                    | SoCC (see section 6 of <b>Application Document 5.1.5 Appendix D SoCC</b> ) published on the Proposed Project webpage for public inspection (see section 8 of <b>Application Document 5.1.5 Appendix D SoCC</b> ).                                                                                                  |

6.5.2 Chapter 7 of this report provides details of how the Statutory consultation was undertaken in compliance with the final SoCC, as per the requirements of Section 47(7) of the Planning Act 2008.

6.5.3 A checklist for SoCC compliance is provided in section 5 of **Application Document 5.1.5 Appendix D SoCC**. The checklist confirms that National Grid undertook the Statutory consultation in accordance with the SoCC.

# 7. Approach to 2023 Statutory Consultation

## 7.1 Introduction

- 7.1.1 This Chapter explains how National Grid undertook consultation, which was in line with Sections 42, 45, 46, 47 and 48 of the Planning Act 2008. The Statutory consultation took place between 24 October 2023 and 18 December 2023. All responses had to be received before 11:59pm on the closing date with postal responses accepted until 02 January 2024 (note: there were some exceptions to this as late responses were agreed with several parties, see Section 7.2). The purpose of this phase of consultation was to seek the views of the communities, landowners, prescribed bodies and other local stakeholders on the Proposed Project proposals which had been developed following Non-statutory consultation.
- 7.1.2 National Grid sought views and feedback on all aspects of the Proposed Project, including:
- proposed Friston substation;
  - proposed offshore route of the HVDC cable, from landfall to landfall;
  - proposed onshore route of the HVDC cable, from landfall to converter station (both in Suffolk and Kent);
  - proposed route of the HVAC link between the Suffolk converter station and the proposed Friston substation;
  - potential for coordination and co-location of infrastructure with other forthcoming infrastructure projects;
  - proposed HVAC overhead line between the Kent converter station and substation, and the Canterbury to Richborough 400 kV overhead line;
  - construction methodology;
  - likely environmental effects arising from the Proposed Project; and
  - approach to biodiversity net gain and mitigation of potential environmental impacts.
- 7.1.3 Full details of the Proposed Project put forward for Statutory consultation can be found in the Project Overview Document in section 4 of **Application Document 5.1.6 Appendix E Statutory Consultation**.
- 7.1.4 The Statutory consultation was open to anyone with an interest in the Proposed Project. National Grid consulted with the local community, including the people living in the vicinity of the Proposed Project, local businesses, community representatives and community groups. Two consultation zones were developed to assist engagement with the local community. The PCZ extended 3 km from the proposed draft Order Limits onshore, whilst the SCZ extended to at least 5 km from the draft Order Limits (including the PCZ) onshore.
- 7.1.5 National Grid consulted with the following groups and individuals:
- all residential and business addresses within the PCZ;

- Parish Council's representing parishes within the PCZ;
- Members of Parliament representing constituencies within and bordering the PCZ and SCZ;
- elected representatives in local authorities within the PCZ;
- 'seldom heard groups' within both consultation zones representing people who are unlikely to respond to traditional consultation techniques, and may need additional support to access materials;
- relevant local interest groups, such as residents' associations, community groups and groups with particular specialisms, such as environmental groups; and
- relevant marine users such as fisheries, developers and existing infrastructure owners.

7.1.6 In addition to the local community, National Grid also consulted with prescribed consultees, including relevant local authorities and statutory undertakers, those listed in Schedule 1 of the APFP Regulations (in accordance with APFP Regulation 3)<sup>1</sup> and those who own, occupy or have a legal interest in, and that would be affected by, the Proposed Project (under Section 44 of the Planning Act 2008).

7.1.7 Further details are provided in the following sections.

## 7.2 Section 42 Consultation

7.2.1 This section provides an overview of the consultation undertaken by National Grid in compliance with Section 42 of the Planning Act 2008 carried out between 24 October 2023 and 18 December 2023 ('the Statutory consultation'). It does not consider the Section 42(1)(d) consultation undertaken by National Grid in connection with the Targeted consultation, which is detailed in Chapter 9 of this report.

### Section 42(1)(a): Identification of Prescribed Bodies

7.2.2 To accord with Section 42(1)(a) of the Planning Act 2008, National Grid compiled a list of prescribed bodies, which was principally derived from prescribed bodies listed in column 1 of the table in Schedule 1 of the APFP Regulations, see section 1 of **Application Document 5.1.6 Appendix E Statutory consultation**. National Grid determined whether a consultee was relevant to the Proposed Project in line with column 2 and column 3 of the table in Schedule 1 of the APFP Regulations. A precautionary approach was taken, whereby a consultee was not discounted unless there was a clear and evidenced reasoning for doing so.

7.2.3 In preparing for the Statutory consultation, National Grid reviewed the Section 42(1)(a) list that had been used for the Non-statutory consultation and updated the list where relevant and necessary to ensure compliance with the Planning Act 2008. In particular, National Grid carried out the following activities to review and update the Section 42(1)(a) list:

- had regard to advice contained in PINS Advice Note 3 when determining categories of persons as prescribed, in particular:
  - A2: Applying the 'relevance test' of the APFP Regulations;
  - A3: Applying the 'circumstance test' of the APFP Regulations;

- checked for any relevant updates to the APFP Regulations and PINS Advice Note 3;
- reviewed the list of consultees notified of the Proposed Project by the Planning Inspectorate (under Regulation 11(1)(a) of the Infrastructure EIA Regulations 2017), as part of the scoping exercise;
- reviewed and checked the contact details of the consultees, updating where necessary. In some instances, the contact address or person used in the consultation differs from the Regulation 11 list provided by the Planning Inspectorate. This is the result of further inquiries that led to a change in address or person, or notification by the consultee that a differing address or person should be used; and
- as a result of this exercise, new Section 42(1)(a) consultees were identified and no existing Section 42(1)(a) consultees who had previously been consulted were removed from the list.

7.2.4 The prescribed bodies consulted on the Proposed Project under Section 42(1)(a) of the Planning Act 2008, as part of the Statutory consultation, are contained in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

### Consulting with prescribed consultees under Section 42(1)(aa)

- 7.2.5 Section 42(1)(aa) requires consultation with the Marine Management Organisation in the event that the Proposed Project affects any of the specified areas, which are:
- (a) waters in or adjacent to England up to the seaward limits of the territorial sea;
  - (b) an exclusive economic zone, except any part of an exclusive economic zone in relation to which the Scottish Ministers have functions;
  - (c) a Renewable Energy Zone, except any part of a Renewable Energy Zone in relation to which Scottish Ministers have functions; and
- 7.2.6 (d) an area designated under section 1(7) of the Continental Shelf Act 1964, except any part of that area which is within a part of an exclusive economic zone or Renewable Energy Zone in relation to which the Scottish Ministers have functions.
- 7.2.7 The Proposed Project is, in part, located offshore in English waters and therefore, National Grid consulted with the Marine Management Organisation. The prescribed bodies consulted on the Proposed Project under Section 42(1)(a) of the Planning Act 2008, as part of the Statutory consultation, are contained in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

### Identification of Parish Councils

- 7.2.8 At the time of the Statutory consultation, the Proposed Project was identified as being within the boundaries of the following Parish Councils:
- Aldeburgh Parish Council;
  - Ash Parish Council;
  - Cliffsend Parish Council;
  - Friston Parish Council;
  - Kelsale-cum-Carlton Parish Council;



- Knodishall Parish Council;
- Minster Parish Council;
- Saxmundham Parish Council;
- Sternfield Parish Council; and
- Worth Parish Council.

7.2.9 In accordance with Schedule 1 to the APFP Regulations, which lists ‘the relevant parish council’ as a prescribed consultee, these Parish Councils were included in the list of prescribed consultees that is found in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

7.2.10 In preparation for the Statutory consultation, National Grid reviewed whether design changes to the Proposed Project, or administrative changes to Parish Council boundaries since the Non-statutory consultation had resulted in the Proposed Project being located within additional or different Parish Council boundaries. It was determined that there were four Parish Councils who were no longer within the Proposed Project Order Limits and therefore consulted as a non-prescribed consultee, these were:

- Aldringham-cum-Thorpe Parish Council;
- Leiston Parish Council;
- Ramsgate Parish Council; and
- Theberton and Eastbridge Parish Council.

## Section 42(1)(b): Identification of the Relevant Local Authorities

7.2.11 Pursuant to Section 42(1)(b) of the Planning Act 2008, National Grid has a duty to consult local authorities identified within Section 43 of the Planning Act 2008. There are ‘A’, ‘B’, ‘C’ and ‘D’ category local authorities. Section 42(1) requires that each local authority within Section 43 must be consulted. Section 43 states:

- a local authority is within this section if the land is in the authority’s area;
- a local authority (“A”) is within this section if: (a) the land is in the area of another local authority (“B”), (aa) B is a unitary council or a lower-tier district council, and (b) any part of the boundary of A’s area is also a part of the boundary of B’s area; and
- (2A) If the land is in the area of an upper-tier county council (“C”), a local authority (“D”) is within this section if: (a) D is not a lower-tier district council, and (b) any part of the boundary of D’s area is also part of the boundary of C’s area.

7.2.12 In preparation for the Statutory consultation, National Grid reviewed the list of Section 42(1)(b) consultees to ensure that no administrative changes had occurred which would result in a local authority no longer being relevant to the Proposed Project or would result in the identification of a new local authority that would require consultation under the Planning Act 2008. The local authorities identified and consulted on the Proposed Project under Section 42(1)(b) are presented in Table 7.1 and found in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

**Table 7.1 Local authorities categorised in accordance with Section 43 of the Planning Act 2008 – Statutory consultation**

| <b>Local authority</b>                | <b>Provision</b> | <b>Category</b> | <b>Description</b>                                                                                              |
|---------------------------------------|------------------|-----------------|-----------------------------------------------------------------------------------------------------------------|
| Dover District Council                | s.43(1)          | B               | The Proposed Project lies within the local authority boundary                                                   |
| Thanet District Council               | s.43(1)          | B               | The Proposed Project lies within the local authority boundary                                                   |
| East Suffolk Council                  | s.43(1)          | B               | The Proposed Project lies within the local authority boundary                                                   |
| Kent County Council                   | s.43(1)          | C               | The Proposed Project lies within the local authority boundary and the authority is an upper-tier county council |
| Suffolk County Council                | s.43(1)          | C               | The Proposed Project lies within the local authority boundary and the authority is an upper-tier county council |
| Babergh District Council              | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| Canterbury City Council               | s.43(2)          | A               | Shares a boundary with Dover District Council and Thanet District Council and is a lower tier local authority   |
| Folkestone and Hythe District Council | s.43(2)          | A               | Shares a boundary with Dover District Council and is a lower tier local authority                               |
| Great Yarmouth Borough Council        | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| Ipswich Borough Council               | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| Mid Suffolk District Council          | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| South Norfolk District                | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| The Broads National Park Authority    | s.43(2)          | A               | Shares a boundary with East Suffolk Council and is a lower tier local authority                                 |
| Cambridgeshire County Council         | s.43(2)          | D               | Shares a boundary with Suffolk County Council, which is a category 'C' authority                                |
| East Sussex County Council            | s.43(2)          | D               | Shares a boundary with Kent County Council, which is a category 'C' authority                                   |
| Essex County Council                  | s.43(2)          | D               | Shares a boundary with Suffolk County Council, which is a category 'C' authority                                |

| Local authority           | Provision | Category | Description                                                                      |
|---------------------------|-----------|----------|----------------------------------------------------------------------------------|
| London Borough of Bexley  | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |
| London Borough of Bromley | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |
| Medway Council            | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |
| Norfolk County Council    | s.43(2)   | D        | Shares a boundary with Suffolk County Council, which is a category 'C' authority |
| Surrey County Council     | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |
| Thurrock Council          | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |
| Greater London Authority  | s.43(2)   | D        | Shares a boundary with Kent County Council, which is a category 'C' authority    |

7.2.13 The administrative boundaries of the local authorities who were consulted under Section 42(1)(b) of the Planning Act 2008 are shown in the plan enclosed in section 3 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

7.2.14 Section 42(1)(c) requires consultation with the Greater London Authority if the land is in Greater London. National Grid was not required to consult with the Greater London Authority, as no part of this is located within Greater London. However, they were consulted on a precautionary basis as a neighbouring authority under the 'D' category.

## Section 42(1)(d): Identification of the Relevant Section 44 Persons with an Interest in the Land

7.2.15 This sub-section considers how National Grid has identified Section 42(1)(d) consultees for the Statutory consultation. It considers relevant legislation, National Grid's approach to land referencing and how National Grid has managed its ongoing diligent inquiries following on from the close of the Statutory consultation.

### Land referencing

7.2.16 The interests which have been consulted under Section 42(1)(d) have been identified through a process of ongoing diligent inquiry, see section 2 of **Application Document 5.1.6 Appendix E Statutory Consultation**. This comprised initial desktop referencing using information obtained from the Land Registry and other online resources (such as Experian, Royal Mail address verification and Companies House checks). The land referencing methodology is provided in **Application Document 5.1.8 Appendix G Land Referencing Methodology** and **Application Document 4.2 Statement of Reasons**. Following this initial desktop exercise, National Grid issued letters and forms by post (First Class) requesting further information (see section 5 of **Application Document 5.1.6 Appendix E Statutory Consultation**) from the parties identified to confirm the interests in the land held by those parties and requesting information on any

other persons with interests in the land. Further inquiries were made by way of further written correspondence, site visits, telephone calls, emails and landowner engagement meetings.

- 7.2.17 National Grid also investigated unregistered land during an initial desktop exercise and through site visits. Desktop steps included a review of unregistered addressable properties to whom questionnaires could be sent addressed to 'The Owner'. On-site investigations included inspection of the land, where accessible, to ascertain the presence of an interest and the erection of site notices on, or in the vicinity of, the unregistered land inviting persons to contact National Grid and its Land Agents.
- 7.2.18 Category 3 parties identified on a precautionary basis by applying a 150 m buffer around the DF2 scheme red line and pulling out any titles and/or addressable properties within that area and including them in the Section 44 list. Similarly to Category 1 and 2 parties, these parties received written correspondence (initially questionnaires and reminder letters), and subsequently where they have made contact, emails and telephone calls. This 150 m buffer was then refined down once appropriate modelling of impacts that may potentially lead to a Section 10 or Part 1 claim was carried out.
- 7.2.19 A detailed description of the methodology as well as a description of communications and negotiations with landowners is set out in **Application Document 4.2 Statement of Reasons** and **Application Document 5.1.8 Appendix G Land Referencing Methodology**.
- 7.2.20 Section 2 of **Application Document 5.1.6 Appendix E Statutory Consultation** contains a list of all persons that National Grid identified as being Section 42(1)(d) consultees who were consulted under that Section during the Statutory consultation which commenced on 24 October 2023 and closed on 18 December 2023.

## Ongoing diligent inquiries and newly arising interests

- 7.2.21 The land referencing process was ongoing throughout the pre-application period and in some instances diligent inquiries led to new interests being identified after the initial issue of Section 42(1)(d) consultation materials in October 2023. New interests arose for a number of reasons such as changes in ownership or occupancy, delays from Land Registry and the late receipt of responses to requests for information. Further details about Targeted consultation and pre-submission engagement under Section 42 (1)(d) of the Planning Act 2008 are provided in Chapter 9 and 10 of this report.

## Conformity with the Book of Reference

- 7.2.22 In accordance with PINS Advice Note: Nationally Significant Infrastructure Projects: Advice on the Consultation Report (2024), the lists of Section 42(1)(d) consultees has been cross checked against **Application Document 4.3 Book of Reference**. Section 2 of **Application Document 5.1.6 Appendix E Statutory Consultation** identifies Section 42(1)(d) consultees and notes against that interest in the 'comments' column:
- persons consulted in accordance with Section 42(1)(d) who are included in the Book of Reference; and
  - persons consulted in accordance with Section 42(1)(d) who are not included in the Book of Reference.

## Carrying out the Statutory Consultation Under Section 42

7.2.23 Having identified the persons under Section 42 of the Planning Act 2008, this sub-section explains how National Grid carried out consultation with them.

### Consultation documents

7.2.24 National Grid prepared the following documents which comprised the 'Section 42 consultation documents' for the purposes of the Statutory consultation under Section 42 carried out between 24 October 2023 and 18 December 2023:

- a covering letter providing an overview of the Proposed Project and details of the consultation process (see sections 5 and 6 of **Application Document 5.1.6 Appendix E Statutory Consultation**);
- Newsletter (see section 7 of **Application Document 5.1.6 Appendix E Statutory Consultation**);
- Feedback Form (see section 8 of **Application Document 5.1.6 Appendix E Statutory Consultation**);
- freepost envelope; and
- Section 48 notice (see section 9 of **Application Document 5.1.6 Appendix E Statutory Consultation**).

7.2.25 As noted in Chapter 3 of this report, National Grid is required by Regulation 13 of the Infrastructure EIA Regulations 2017, to send a copy of the Section 48 notice to the consultation bodies (as defined in Regulation 3). National Grid elected to include that notice in the Statutory consultation documents which were issued to all consultees identified under Section 42, going beyond the statutory minimum by also sending it to Section 42(1)(d) consultees.

7.2.26 The Section 48 notice was sent to all Section 42(1)(a), (b) and (d) consultees on 20 October 2023 (for those who received Section 42 consultation documents by post) and on 23 October 2023 (for those who received Section 42 consultation documents by email). Section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation** outlines which consultees received Section 42 consultation documents by email and/or post.

### Issue of consultation documents

7.2.27 National Grid commenced issuing the Section 42 consultation documents on 19 October 2023 to the following Section 42 consultees:

- Section 42(1)(a) prescribed bodies;
- Section 42(1)(b) the relevant local authorities; and
- Section 42(1)(d) land interests.

### Method of delivery – post

7.2.28 The consultation documents were delivered in a range of formats depending on the type of consultee.

- 7.2.29 Generally, all Section 42(1)(a), (b) and (d) consultees listed in sections 1 and 2 of **Application Document 5.1.6 Appendix E Statutory Consultation** were initially issued the consultation documents by way of Royal Mail Tracked24 Delivery which allowed for tracking of packages and proof of delivery. The only exceptions relate to a small number of bodies listed in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**, shown in blue highlight, which were issued the consultation documents by email only. In those cases, the consultee was issued information electronically because they had previously requested to receive information electronically only. The initial postal issue of consultation documents was dispatched on 20 October 2023, ahead of the start of the Statutory consultation.

#### Method of delivery – email

- 7.2.30 In addition to postal copies, National Grid also issued the consultation documents in electronic format to the majority of consultees.
- 7.2.31 In a small number of cases, National Grid issued the consultation materials to consultees listed in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation** by email only. Where this has occurred, those consultees are highlighted in blue in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**.
- 7.2.32 As standard, Section 42(1)(d) consultees were not emailed the consultation documents, as email addresses are not provided through Land Registry records and it is considered preferable to avoid sending sensitive information such as land ownership records via email.

#### Method of delivery – backcheck

- 7.2.33 Backchecks were undertaken between the 02 November and 20 November 2023 to ensure that at least one of the contact methods detailed above had been delivered successfully. From these backchecks, it was identified that the following letters had not been confirmed delivered by Royal Mail:
- Greater Gabbard OFTO;
  - Cadent Gas;
  - OceanIQ Q&E North Cable;
  - Natural England;
  - The Equality and Human Rights Commission;
  - The Joint Nature Conservation Committee;
  - The Canal and River Trust;
  - Murphy Gas Networks;
  - EDF Energy;
  - Dock and Harbour Authority;
  - Energy Assets Pipelines;
  - Royal Mail; and



- South Norfolk Council.

7.2.34 Of the above, it was initially confirmed that all consultees (except Royal Mail) had been successfully contacted by email, meaning that the consultees had been formally consulted. An alternative Royal Mail email contact was obtained and notified via email on 20 November 2023, who then subsequently responded to provide an additional Royal Mail email contact who would respond to the consultation.

7.2.35 On 28 November, it was identified that a number of prescribed consultees had not initially been contacted by email, as follows:

- Kent and Medway NHS and Social Care Partnership Trust;
- Natural England;
- NHS Mid and South Essex Integrated Care Board;
- NHS Kent and Medway Integrated Care Board;
- Cronos Energy;
- Tarchon Energy;
- Health and Safety Executive;
- Historic England;
- Kent Fire and Rescue;
- Suffolk Fire and Rescue;
- Kent and Medway Fire and Rescue Authority;
- Office of the Police and Crime Commissioner for Suffolk;
- Office of the Police and Crime Commissioner for Kent;
- Minister Parish Council;
- Cliffsend Parish Council;
- Ash Parish Council;
- Worth Parish Council;
- Friston Parish Council;
- Aldeburgh Parish Council;
- Saxmundham Town Council;
- Benhall and Sternfield Parish Council;
- Kelsale cum Carlton Parish Council;
- Knodishall Parish Council;
- Environment Agency; and
- The Equality and Human Rights Commission.

7.2.36 All of the above consultees, with the exception of the Equality and Human Rights Commission, had already been successfully consulted via Royal Mail Tracked24 Delivery. Additionally, all prescribed consultees were contacted again by email on 30

November 2023 to provide a reminder of the ongoing consultation (see section 10 of **Application Document 5.1.6 Appendix E Statutory Consultation**).

- 7.2.37 Regarding the Equality and Human Rights Commission, an email was sent to an alternative contact on 29 November 2023, followed up by a postal consultation pack on 30 November, notifying them of the consultation and extending the consultation deadline to 05 January 2024, allowing at least 28 days for the consultee to provide a response. It was also identified that Natural England's postal consultee pack had not been successfully delivered, but a member of Natural England staff subsequently confirmed that they had received notice of the consultation.
- 7.2.38 Additional extensions were agreed, upon request, for:
- Historic England – 22 December 2023;
  - Landowner of SK311155 (title number) – 25 January 2024;
  - East Suffolk Council – 5 January 2024;
  - Wildfowl and Wetlands Trust – 5 January 2024;
  - Church Commissioners for England – 9 January 2024; and
  - Nautilus Interconnector – 12 January 2024.
- 7.2.39 A further backcheck to ensure that the letter and/or email had been successfully delivered to all Section 42(1)(a), (aa) and (b) consultees was undertaken.
- 7.2.40 The above explains and evidences that National Grid complied with the statutory requirements of the Planning Act 2008 in relation to the distribution of consultation documents.

### Deadline for response – Section 45 of the Planning Act 2008

- 7.2.41 In accordance with Section 45 of the Planning Act 2008, the covering letters (see section 5 and 6 of **Application Document 5.1.6 Appendix E Statutory Consultation**) stated that the consultation commenced on 24 October 2023 and that responses needed to be returned by 11:59pm on 18 December 2023, allowing more than the statutory minimum of 28 days. As described above, a few consultees were granted extensions.
- 7.2.42 The tables in sections 1 and 2 of **Application Document 5.1.6 Appendix E Statutory Consultation** also list, for each statutory consultee, the date by which National Grid obtained proof of receipt of the consultation documents and the corresponding deadline specified. The vast majority of Section 42 consultees received the consultation documents on 20 October 2023.
- 7.2.43 As would be expected in a consultation of the scale carried out by National Grid, there were a small number of instances where mail was not accepted by the recipient, was returned to the sender or otherwise undeliverable. Section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation** notes each consultee where this was the case and detail the actions taken by National Grid to ensure the consultation documents were delivered in a timely manner.
- 7.2.44 National Grid confirms that all persons initially consulted under Section 42 received the consultation documents with sufficient time to observe the minimum 28-day period, running from the day after receipt of the documents, prescribed by Section 45 of the Planning Act 2008.

## Responses to the 2023 Section 42 consultation

- 7.2.45 Section 8.2 **Application Document 5.1 Consultation Report** (this report) provides details of how the analysis of consultation responses has been undertaken by National Grid. As noted within Section 8.2 of this report, National Grid has had regard to Nationally Significant Infrastructure Projects: Advice on the Consultation Report and followed an ‘issues led approach’ by grouping responses under the key themes arising from the consultation where levels of responses are significant.
- 7.2.46 National Grid has therefore structured section 24 and 25 **Application Document 5.1.6 Appendix E Statutory consultation**, section 17 **Application Document 5.1.7 Appendix F Targeted consultation** and Table 10.4 to follow an issues led approach in order to capture and summarise each relevant issue from online or written feedback forms, letters and emails. These appendices clearly identify under which strand of consultation the responses were received and whether or not National Grid changed the Proposed Project as a result of the comments.

## Conclusion

- 7.2.47 The above explains and evidences that National Grid complied with the statutory requirements for consultation under Section 42 of the Planning Act 2008 during the Statutory consultation. Further details of compliance are set out in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**.

## 7.3 Section 46 Notification

- 7.3.1 National Grid wrote to the Planning Inspectorate (acting on behalf of the SoS) on 20 October 2023 by letter and email setting out its intention under Section 46 of the Planning Act 2008 to submit an application for development consent. In accordance with Section 46(1) of the Planning Act 2008, the letter enclosed the same information issued to Section 42 consultees:
- the Section 42 cover letter, see section 5 of **Application Document 5.1.6 Appendix E Statutory Consultation**;
  - copy of the Newsletter, see section 7 of **Application Document 5.1.6 Appendix E Statutory Consultation**;
  - consultation Feedback Form (including Freepost envelope for prescribed consultees), see section 8 of **Application Document 5.1.6 Appendix E Statutory Consultation**; and
  - a paper copy of a notice pursuant to Section 48 of the Planning Act 2008 and Regulation 4 of the APFP Regulations, see section 9 of **Application Document 5.1.6 Appendix E Statutory Consultation**.
- 7.3.2 A copy of the Section 46 notification letter is provided in section 11 of **Application Document 5.1.6 Appendix E Statutory Consultation**.
- 7.3.3 In accordance with Section 46(2) of the Planning Act 2008, this letter was sent at the same time as issuing the consultation documents to Section 42 consultees, and prior to the commencement of the statutory Section 42 consultation on 24 October 2023.

- 7.3.4 A formal acknowledgement of the Section 46 notification was issued by the Planning Inspectorate on 24 October 2023 (see section 12 of **Application Document 5.1.6 Appendix E Statutory Consultation** confirming receipt of the consultation documents.

## Conclusion

- 7.3.5 The above explains and evidences that National Grid complied with the statutory requirements to notify the SoS under Section 46 of the Planning Act 2008 during the Statutory consultation. Further details of compliance are set out in **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**.

## 7.4 Section 47 Consultation

- 7.4.1 National Grid undertook Section 47 consultation with the local community and key stakeholders in accordance with the published SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**). The SoCC Compliance Checklist (see section 5 of **Application Document 5.1.5 Appendix D SoCC**) demonstrates how National Grid undertook the Section 47 consultation in accordance with the published SoCC.
- 7.4.2 Table 7.2 outlines the key Section 47 consultation dates.

Table 7.2 Key Section 47 consultation dates for the Statutory consultation

| Date       | Consultation activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 24.10.2023 | SoCC available to view online on the Proposed Project website                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 20.10.2023 | A consultation pack including the Newsletter, Feedback Form and a return envelope was sent to addresses within the PCZ via Royal Mail                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 26.09.2023 | <p>Stakeholder briefing 1 (Friston Parish Council, Leiston-cum-Sizewell Town Council, Snape Parish Council, Theberton and Eastbridge Parish Council, Sudbourne Parish Council, Middleton Parish Council and Minster Parish Council members)</p> <p>This pre-consultation briefing was run as a webinar and covered the following:</p> <ul style="list-style-type: none"> <li>• approach to Statutory consultation</li> <li>• how to get involved with the consultation</li> <li>• dates/times of public exhibitions, webinars and 'As the Expert's sessions</li> <li>• how to give feedback</li> </ul> |
| 28.09.2023 | <p>Stakeholder briefing 2 (Saxmundham Town Council and Thanet District Council officers and members)</p> <p>The pre-consultation briefing was run as a webinar and covered the following:</p> <ul style="list-style-type: none"> <li>• approach to Statutory consultation</li> <li>• how to get involved with the consultation</li> <li>• dates/times of public exhibitions, webinars and 'As the Expert's sessions</li> </ul>                                                                                                                                                                         |

| Date              | Consultation activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | <ul style="list-style-type: none"> <li>• how to give feedback</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                             |
| 04.10.2023        | <p data-bbox="347 293 1011 331">Stakeholder briefing 3 (Save Minster Marshes)</p> <p data-bbox="347 349 1453 387">The pre-consultation briefing was run as a webinar and covered the following:</p> <ul style="list-style-type: none"> <li>• approach to Statutory consultation</li> <li>• how to get involved with the consultation</li> <li>• dates/times of public exhibitions, webinars and 'As the Expert's sessions</li> <li>• how to give feedback</li> </ul>                 |
| 09.10.2023        | <p data-bbox="347 658 1177 696">Stakeholder briefing 4 (Marine Management Organisation)</p> <p data-bbox="347 714 836 752">The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• marine route development</li> <li>• additional survey requirements</li> <li>• additional licencing requirements <ul style="list-style-type: none"> <li>○ UXO consenting</li> <li>○ intertidal boreholes</li> </ul> </li> </ul>                                           |
| 17.10.2023        | <p data-bbox="347 1077 1139 1115">Stakeholder briefing 5 (Suffolk Energy Action Solutions)</p> <p data-bbox="347 1133 1453 1171">The pre-consultation briefing was run as a webinar and covered the following:</p> <ul style="list-style-type: none"> <li>• approach to Statutory consultation</li> <li>• how to get involved with the consultation</li> <li>• dates/times of public exhibitions, webinars and 'Ask the Expert's sessions</li> <li>• how to give feedback</li> </ul> |
| <b>24.10.2023</b> | <b>Statutory consultation period starts</b>                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 24.10.2023        | <p data-bbox="347 1503 1161 1541">Stakeholder briefing 6 (Suffolk County Council members)</p> <p data-bbox="347 1559 836 1597">The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• onshore opposed to offshore</li> <li>• cable corridor widths</li> <li>• feedback procedures</li> <li>• assistive technology for persons with sight impairments</li> <li>• coordination with other projects</li> <li>• proposed Friston substation</li> </ul>         |

| Date       | Consultation activity                                                                                                                                                                                                                                                                                                                                         |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 24.10.2023 | Consultation documents available to view online on the proposed Project website. Paper copies of the consultation documents also available to order from National Grid                                                                                                                                                                                        |
| 24.10.2023 | Proposed Project email, freephone telephone number available                                                                                                                                                                                                                                                                                                  |
| 24.10.2023 | Pre-recorded webinar available online on the Proposed Project website (Onshore proposals in Suffolk and Kent and marine proposals)                                                                                                                                                                                                                            |
| 25.10.2023 | Webinar 1 (Onshore proposals in Suffolk and marine proposals)                                                                                                                                                                                                                                                                                                 |
| 26.10.2023 | Webinar 2 (Onshore proposals in Kent and marine proposals)                                                                                                                                                                                                                                                                                                    |
| 26.10.2023 | Stakeholder briefing 7 (Engaged Communities Forum in Suffolk)<br><br>The briefing was a high level introduction to the Proposed Project where the Statutory consultation was presented. The purpose of the session was to encourage participation amongst seldom heard communities, of whom the Engaged Communities Forum represents                          |
| 26.10.2023 | Ask the experts' session 1 (telephone or video call)                                                                                                                                                                                                                                                                                                          |
| 01.11.2023 | Webinar 3 (Onshore proposals in Kent and marine proposals)                                                                                                                                                                                                                                                                                                    |
| 06.11.2023 | Stakeholder briefing 8 (East Suffolk District Council members)<br><br>The briefing covered the following: <ul style="list-style-type: none"> <li>• general principles of development</li> <li>• needs case</li> <li>• landfall between Aldeburgh and Thorpeness</li> <li>• cable corridor widths</li> <li>• height of converter stations</li> </ul>           |
| 07.11.2023 | Stakeholder briefing 9 (Kent County Council, Dover District Council, Thanet District Council officers)<br><br>The briefing covered the following: <ul style="list-style-type: none"> <li>• needs case and location</li> <li>• alternatives explored</li> <li>• traffic and transport</li> <li>• community benefits</li> <li>• continued engagement</li> </ul> |
| 07.11.2023 | Stakeholder briefing 10 (Kent County Council members)<br><br>The briefing covered the following: <ul style="list-style-type: none"> <li>• convertor station and substation environmental impacts</li> </ul>                                                                                                                                                   |



| Date       | Consultation activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <ul style="list-style-type: none"> <li>change since the last consultation</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 07.11.2023 | <p data-bbox="347 293 1410 365">Stakeholder briefing 11 (Thanet District Council members, Cliffsend Parish Council, Ramsgate Town Council, Minster Parish Council)</p> <p data-bbox="347 387 839 425">The briefing covered the following:</p> <ul style="list-style-type: none"> <li>cumulative impacts across the Isle of Thanet</li> <li>long-term impacts on designated sites including Hacklinge Marshes</li> <li>construction and the water environment</li> <li>overhead line connections</li> </ul>                                                                                |
| 07.11.2023 | Ask the experts' session 2 (telephone or video call)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 07.11.2023 | <p data-bbox="347 768 1007 806">Stakeholder briefing 12 (Environment Agency)</p> <p data-bbox="347 828 1452 974">This meeting used one of the established regular meeting slots with the EA to present consultation proposals in a format specifically tailored to their remit and address any initial queries from the EA to help inform their consultation response.</p>                                                                                                                                                                                                                |
| 08.11.2023 | Public information exhibition 1 (Aldeburgh, Suffolk)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 09.11.2023 | Public information exhibition 2 (Aldeburgh, Suffolk)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10.11.2023 | <p data-bbox="347 1153 1437 1234">Stakeholder briefing 13 (Suffolk County Council, East Suffolk District Council officers)</p> <p data-bbox="347 1256 839 1294">The briefing covered the following:</p> <ul style="list-style-type: none"> <li>needs case</li> <li>Friston substation</li> <li>water environment</li> <li>Area of Outstanding Natural Beauty</li> <li>sharing of data</li> <li>design and construction</li> <li>ongoing engagement</li> <li>walking, cycling and horse-riding</li> <li>noise and vibration</li> <li></li> <li>coordination with other projects</li> </ul> |
| 15.11.2023 | Public information exhibition 3 (Cliffsend, Kent)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Date       | Consultation activity                                                                                                                                                                                                                                                                                                                                         |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16.11.2023 | Public information exhibition 4 (Minster, Kent)                                                                                                                                                                                                                                                                                                               |
| 16.11.2023 | <p>Stakeholder briefing 14 (Minster Parish Council members)</p> <p>The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• community grant opportunities</li> <li>• environmental mitigation</li> <li>• construction</li> <li>• traffic and transport</li> <li>• walking, cycling and horse-riding</li> <li>• archaeology</li> </ul> |
| 17.11.2023 | Public information exhibition 4 (Sandwich, Kent)                                                                                                                                                                                                                                                                                                              |
| 22.11.2023 | Webinar 4 (Onshore proposals in Suffolk and marine proposals)                                                                                                                                                                                                                                                                                                 |
| 23.11.2023 | Ask the experts' session 3 (Friston, Suffolk)                                                                                                                                                                                                                                                                                                                 |
| 24.11.2023 | <p>Stakeholder briefing 15 (Friston Parish Council members)</p> <p>The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• intra project cumulative effects</li> <li>• water environment</li> </ul>                                                                                                                                  |
| 24.11.2023 | Public information exhibition 5 (Saxmundham, Suffolk)                                                                                                                                                                                                                                                                                                         |
| 25.11.2023 | Public information exhibition 6 (Saxmundham, Suffolk)                                                                                                                                                                                                                                                                                                         |
| 26.11.2023 | <p>Stakeholder briefing 16 (Natural England)</p> <p>This meeting used one of the established regular meeting slots with the Natural England to present consultation proposals in a format specifically tailored to their remit and address any initial queries, helping to inform their consultation response.</p>                                            |
| 29.11.2023 | Public information exhibition 7 (Cliffsend, Kent)                                                                                                                                                                                                                                                                                                             |
| 01.12.2023 | Ask the experts' session 4 (Ramsgate, Kent)                                                                                                                                                                                                                                                                                                                   |
| 02.12.2023 | Public information exhibition 8 (Ramsgate, Kent)                                                                                                                                                                                                                                                                                                              |
| 06.12.2023 | Ask the experts' session 5 (telephone or video call)                                                                                                                                                                                                                                                                                                          |
| 08.12.2023 | Webinar 5 (Onshore proposals in Suffolk and marine proposals)                                                                                                                                                                                                                                                                                                 |
| 08.12.2023 | Stakeholder briefing 17 (Canterbury City Council officers and members)                                                                                                                                                                                                                                                                                        |

| Date              | Consultation activity                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | <p>The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• Statutory consultation</li> <li>• overhead line refurbishment</li> </ul>                                                                                                                                                                                                                                                                           |
| 13.12.2023        | <p>Stakeholder briefing 18 (Kelsale-cum-Carlton Parish Council and Leiston Town Council members)</p> <p>The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• onshore and offshore route location</li> <li>• design</li> <li>• alternatives</li> <li>• traffic and transport</li> <li>• construction</li> <li>• coordination with other Projects</li> <li>• water environment</li> <li>• tourism</li> </ul> |
| 15.12.2023        | <p>Stakeholder briefing 19 (Aldeburgh Town Council members)</p> <p>The briefing covered the following:</p> <ul style="list-style-type: none"> <li>• consultation</li> <li>• design change requests</li> <li>• construction</li> <li>• ongoing engagement</li> </ul>                                                                                                                                                                    |
| <b>18.12.2023</b> | <b>Statutory consultation closes</b>                                                                                                                                                                                                                                                                                                                                                                                                   |

7.4.3 The 2023 Section 47 consultation phase commenced on 24 October 2023 and closed on 18 December 2023, allowing more than the statutory minimum of 28 days. This consultation phase ran concurrently with the 2023 Section 42 consultation phase.

## Statutory Consultation Documents

7.4.4 To support the delivery of Statutory consultation, National Grid produced a variety of consultation documents to explain the proposals and what was being consulted on, and to publicise the consultation, the methods via which people could respond and the date by which responses needed to be provided. National Grid ensured information was available by:

- uploading all consultation documents to the dedicated Proposed Project website;
- depositing key consultation documents at easily accessible public information points;

- organising consultation events to give local people an opportunity to view project documents and give them the opportunity to ask questions; and
- making documents available in paper copy on request.

7.4.5

The consultation documents that were available to be viewed are as follows:

- a summary newsletter (section 7 of **Application Document 5.1.6 Appendix E Statutory Consultation**) outlining how members of the public could get involved in the consultation, including dates and times of public exhibitions, webinars and ‘Ask the Expert’ sessions, locations of where more detailed information about the proposals can be found (including both physical and virtual locations), how to submit feedback and the contact details for the Proposed Project team;
- a Project Overview Document (section 4 of **Application Document 5.1.6 Appendix E Statutory Consultation**) which gave a comprehensive overview of the Proposed Project, its various components and where to find more detailed information and contact the Proposed Project team. The document was written in non-technical language;
- a condensed version of the Project Overview Document (section 13 of **Application Document 5.1.6 Appendix E Statutory Consultation**), intended to concisely summarise and explain the background to the Proposed Project and proposals. This document was intended to have a read-time of less than 10 minutes;
- an Options Selection and Design Evolution Report (section 14 of **Application Document 5.1.6 Appendix E Statutory Consultation**) which was a report outlining the development of the Proposed Project and the rationale behind each component;
- Non-Statutory Consultation Report (see section 1 **Application Document 5.1.4 Appendix C Non-Statutory Consultation**) which is a report presenting the results of the Non-statutory consultation that took place between 24 October and 18 December 2022. The report presents the feedback received and how National Grid had regard to the feedback;
- a Feedback Form (section 8 of **Application Document 5.1.6 Appendix E Statutory Consultation**) which had both open and closed questions designed to gain the thoughts and feedback on the Proposed Project. The Form was split into sections for Suffolk, Offshore, Kent and General;
- consultation banners (section 15 of **Application Document 5.1.6 Appendix E Statutory Consultation**) which were used during public information events. These were designed to provide an overview of key components of the Proposed Project and assist the understanding of the Proposed Project during consultation events. An audio version of the banners was made available;
- plans and drawings were produced and made available on the Proposed Project website. Paper copies could be requested at no cost; and
- a non-technical summary of the Preliminary Environmental Information Report which summarises the environmental information and the results of the preliminary assessments of any likely significant effects of the Proposed Project, along with proposed mitigation measures. The full Preliminary Environmental Information Report was available to view on the Proposed Project website and paper copies could also be requested. The full Report can be found on the Proposed Project website and the non-technical summary is provided in (section 16 of **Application Document 5.1.6 Appendix E Statutory Consultation**).

## Proposed Project Website

7.4.6 The dedicated Proposed Project website contained all the consultation documents to explain the proposals and what was being consulted on along with additional features described in [Table 7.3](#).

Table 7.3 Features of Proposed Project website

| Function                                                                                          | Rationale                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Interactive map with layers that can be added and removed                                         | To enable members of the public to see how different components of the Proposed Project fit together and how they interact with the existing area                  |
| Interactive map directing members of the public and stakeholders to general arrangement plan maps | To enable members of the public and other stakeholders to access detailed maps of the Proposed Project                                                             |
| HTML/digitally accessible version of Project Overview Document                                    | To present the content of the Project Overview Document in a format more compatible with accessibility tools and different device formats                          |
| Videos, infographics and animations                                                               | To aid with understanding of the Proposed Project                                                                                                                  |
| Frequently asked questions                                                                        | To provide answers to frequently asked questions without the need to contact the Proposed Project team or attend an in-person event                                |
| Online feedback form                                                                              | To enable members of the public to submit their feedback online and reduce the carbon footprint of consultation activity                                           |
| Webinar sign-up form                                                                              | To enable members of the public to sign-up to webinars                                                                                                             |
| 'Ask the Experts' sign-up form                                                                    | To enable members of the public to book a video, telephone or in-person 'Ask the Experts' appointment                                                              |
| Contact details                                                                                   | To provide details of how to contact the Proposed Project team for any further questions                                                                           |
| Accessibility                                                                                     | The Proposed Project website was compatible with assistive technology such as screen readers, to ensure accessibility for all those engaging with the consultation |

## Deposit Locations

- 7.4.7 Paper copies of the Project Overview Document, Options Selection and Design Evolution Report, Non-Statutory Consultation Report, SoCC, non-technical summary of the Preliminary Environmental Information Report, Newsletter, Feedback Form and freepost envelope were made available at the deposit points in Table 7.4. Information on how to access a digital copy of the full Preliminary Environmental Information Report was also provided. The deposit point locations were selected following a review of the success of the deposit points utilised at the Non-statutory consultation.

Table 7.4 Deposit locations for Statutory consultation

| Location                | Address                                                 |
|-------------------------|---------------------------------------------------------|
| Saxmundham Library      | Block B, Street Farm Road, Saxmundham, IP17 1AL         |
| Leiston Library         | Main Street, Leiston, IP16 4ER                          |
| Aldeburgh Library       | Victoria Road, Aldeburgh, IP15 5EG                      |
| Snape Village Hall      | 5 Garrett Close, Snape, Saxmundham, IP17 1RN            |
| Friston Village Hall    | Church Road, Friston, Saxmundham, IP17 1PU              |
| Ash Library             | 11 Queen's Road, Ash, Canterbury, CT3 2BG               |
| Minster Library         | 4a Monkton Road, Minster, Ramsgate, CT12 4EA            |
| Sandwich Library        | 13 Market Street, Sandwich, CT13 9DA                    |
| Ramsgate Library        | Guildford Lawn, Ramsgate, CT11 9AY                      |
| Newington Library       | Royal Harbour Academy, Stirling Way, Ramsgate, CT12 6FA |
| Thanet District Council | Cecil Street, Margate, CT9 1AY                          |
| Margate Library         | Cecil Street, Margate, CT9 1RE                          |

## Public Information Exhibitions

- 7.4.8 Nine public exhibitions were held for communities to find out information about the Proposed Project and the Statutory consultation events and to talk to representatives from the Proposed Project team. The exhibitions were held at suitable, publicly accessible venues that were within or near to the PCZ. National Grid conducted events on both weekdays and weekends to ensure as broad a range of people as possible were able to attend.
- 7.4.9 Copies of consultation materials were made available in print format at each exhibition. These were as follows:
- Project Overview Document;
  - Project Overview Document, 10-minute read;
  - Community newsletter;



- Feedback Form;
- Preliminary Environmental Information Report Non-Technical Summary;
- Converter station design, background to potential architectural approaches;
- Option Selection and Design Evolution Report;
- Strategic options report;
- Non-Statutory Consultation Report;
- SoCC;
- Guide to interacting with the consultation plans and drawings;
- General arrangement plans;
- Design drawings;
- Our approach to consenting;
- Our approach to options appraisal;
- Construction best practice for overhead line installation;
- Construction best practice for underground cable installation; and
- Electric and magnetic fields (EMFs).

7.4.10 There was a series of banners (section 15 of **Application Document 5.1.6 Appendix E Statutory Consultation**) to present the proposals for the Proposed Project, including maps. Details of the events, together with attendance statistics, are provided in Table 7.5.

7.4.11 The public exhibition events provided an option for consultees to ask for further information about the Proposed Project, the consultation or the consultation materials. Attendees were able to submit feedback in writing and were invited to do so.

Table 7.5 Public exhibition events

| Date             | Time              | Location                                                             | Attendees |
|------------------|-------------------|----------------------------------------------------------------------|-----------|
| 08 November 2023 | 12:30pm to 5:30pm | Old Generator Station, King's Field, Aldeburgh, IP15 5HY             | ~ 250     |
| 09 November 2023 | 11am to 4:30pm    | Old Generator Station, King's Field, Aldeburgh, IP15 5HY             | ~ 250     |
| 15 November 2023 | 2:30pm to 7:30pm  | Cliffsend Village Hall, 55 Foads Lane, Cliffsend, Ramsgate, CT12 5JH | 58        |
| 16 November 2023 | 12pm to 5:30pm    | Minster Village Hall, 1 high Street, Minster, CT13 9AH               | 55        |
| 17 November 2023 | 10am to 3pm       | Guildhall, Cattle Market, Sandwich, CT13 9AH                         | 56        |

| Date             | Time        | Location                                                             | Attendees |
|------------------|-------------|----------------------------------------------------------------------|-----------|
| 24 November 2023 | 1pm to 6pm  | Market Hall, High Street, Saxmundham, IP17 1AF                       | 244       |
| 25 November 2023 | 11am to 4pm | Market Hall, High Street, Saxmundham, IP17 1AF                       | 231       |
| 29 November 2023 | 2pm to 7pm  | Cliffsend Village Hall, 55 Foads Lane, Cliffsend, Ramsgate, CT12 5JH | 54        |
| 02 December 2023 | 11am to 3pm | Royal Harbour Academy, Marlowe Way, Newington, Ramsgate, CT12 6FA    | 32        |

## Webinars

- 7.4.12 Online webinars were held on the dates and times identified in Table 7.6, which also provides attendance statistics. A total of five webinars were held during the Statutory consultation period; a further webinar was planned specifically for youth on 12 December 2023, but those registered did not end up attending. Of the five webinars, three focused on the Proposed Project in Suffolk and two in Kent. The entire scheme was the subject of the youth webinar and all webinars included the Proposed Project in the marine environment. Each webinar included a ‘question and answer’ session enabling members of the public to submit questions to the team for a response.
- 7.4.13 A pre-recorded webinar was shared on the Proposed Project website at the start of the Statutory consultation period, providing an overview of the onshore proposals in Suffolk and Kent, together with the marine proposals.
- 7.4.14 The webinar planned for 31 October 2023 had to be cancelled due to technical difficulties associated with launching the online software on the day. In consultation with the Host Authorities, it was agreed that two further webinars would be arranged; one took place on 22 November 2023. However, due to an error in notifying the registered attendees of the original webinar, a further webinar was arranged on 8 December 2023, ensuring all original registered attendees were notified of a rearranged webinar.
- 7.4.15 The webinar on the 01 November 2023 (Kent) and the 08 December 2023 (Suffolk) included live captions and a British Sign Language interpreter. Registration for the webinars was possible through the Proposed Project website or by email. A recording of each type of webinar was posted on the Proposed Project website to allow members of the public to view it in their own time.
- 7.4.16 While it was not possible to submit a relevant response to the Statutory consultation during the webinars, they provided an option for consultees to ask for information about the Proposed Project, the consultation or the consultation materials.

Table 7.6 Webinars held during the Statutory consultation

| Date             | Time              | Webinar description                                                                     | Number of attendees                     |
|------------------|-------------------|-----------------------------------------------------------------------------------------|-----------------------------------------|
| 24 October 2023  | Pre-recorded      | General: Onshore proposals in Suffolk and Kent and marine proposals                     | N/A                                     |
| 25 October 2023  | 6pm to 7pm        | General: Onshore proposals in Suffolk and marine proposals                              | 23                                      |
| 26 October 2023  | 6pm to 7pm        | General: Onshore proposals in Kent and marine proposals                                 | 5                                       |
| 31 October 2023  | 2pm to 3pm        | General: Onshore proposals in Suffolk and marine proposals                              | Postponed due to technical difficulties |
| 01 November 2023 | 2pm to 3pm        | General: Onshore proposals in Kent and marine proposals                                 | 8                                       |
| 22 November 2023 | 12:30pm to 1:30pm | General: Onshore proposals in Suffolk and marine proposals (rearranged from 31 October) | 3                                       |
| 08 December 2023 | 10am to 11am      | General: Our proposals in Suffolk and marine proposals (additional date added)          | 11                                      |
| 12 December 2023 | 4:30pm to 5:30pm  | Youth: Our proposals in Suffolk and Kent and marine proposal                            | 4 registered but did not attend         |

## ‘Ask the Experts’ Sessions

- 7.4.17 ‘Ask the Experts’ sessions were held on the dates and times identified in Table 7.7, which also provides attendance statistics. National Grid held six ‘Ask the Experts’ sessions over the Statutory consultation period. The aim was for them to provide an opportunity for those with more detailed questions about the Proposed Project and/or those unable to attend a public exhibition or webinar to speak directly with members of the Proposed Project team. These sessions were delivered on an appointment-only basis and were conducted through a mixture of in-person or via telephone or video call.
- 7.4.18 Telephone and video call appointment slots were available to book throughout the consultation period, whilst in-person appointments were offered during weeks that a public information exhibition was taking place. National Grid sought to hold in-person appointments at venues closer to National Grid’s proposals and that were not suitable for a full public information exhibition.
- 7.4.19 While it was not possible to submit a relevant response to the Statutory consultation via the ‘Ask the Experts’ sessions, they provided an option for consultees to ask further information about the Proposed Project, the consultation or the consultation materials.
- 7.4.20 National Grid also responded to individual queries and information requests from consultees via email, letter and phone calls.

Table 7.7 Summary of ask the experts sessions held during the Statutory consultation

| Date             | Time              | Location                | Attendees              |
|------------------|-------------------|-------------------------|------------------------|
| 26 October 2023  | Morning/afternoon | Telephone or video call | No appointments booked |
| 2 November 2023  | Afternoon/evening | Telephone or video call | 1                      |
| 7 November 2023  | Morning/afternoon | Telephone or video call | 2                      |
| 23 November 2023 | 3pm to 7:30pm     | Friston Village Hall    | 11                     |
| 1 November 2023  | 2pm to 6pm        | Radford House, Ramsgate | 6                      |
| 6 December 2023  | Afternoon/evening | Telephone or video call | 6                      |

## Stakeholder Briefings

7.4.21 National Grid held stakeholder briefing sessions between 24 October 2023 and 15 December 2023. The briefings were conducted using video conferencing and covered details about the Proposed Project and provided details of the Statutory consultation, including how stakeholders could engage with the process. At the briefings, members of the Proposed Project team gave a presentation and then took questions from attendees. Table 7.8 provides further details about the stakeholder briefing sessions.

Table 7.8 Stakeholder briefing sessions

| Stakeholder briefing session                                      | Date             |
|-------------------------------------------------------------------|------------------|
| Suffolk County Council members                                    | 24 October 2023  |
| Engaged Communities (Suffolk)                                     | 26 October 2023  |
| East Suffolk District Council members                             | 06 November 2023 |
| Kent County, Dover District and Thanet District Council officers  | 07 November 2023 |
| Kent County Council members                                       | 07 November 2023 |
| Thanet District Council members                                   | 07 November 2023 |
| Environment Agency                                                | 07 November 2023 |
| Suffolk County Council and East Suffolk District Council officers | 10 November 2023 |
| Private Individual Landowners                                     | 14 November 2023 |
| Minster Parish Council                                            | 16 November 2023 |
| Friston Parish Council                                            | 24 November 2023 |
| Natural England                                                   | 26 November 2023 |

| Stakeholder briefing session          | Date             |
|---------------------------------------|------------------|
| Benhall and Sternfield Parish Council | 04 December 2023 |
| Canterbury Parish Council             | 08 December 2023 |
| Kelsale-cum-Carlton Parish Council    | 13 December 2023 |
| Leiston Town Council                  | 13 December 2023 |
| Aldeburgh Town Council                | 15 December 2023 |

## Engaging Seldom Heard Groups

- 7.4.22 Seldom heard groups are defined as being inaccessible to most traditional and conventional methods of consultation for any reason. These reasons could include young people, people with a physical disability, people with learning difficulties and people whose first language is not English. These people are less likely to participate in or respond to traditional consultation techniques in comparison to other consultees.
- 7.4.23 Whilst completing stakeholder mapping, National Grid sought to identify organisations who represent seldom heard and local interest groups. Seldom heard groups were directly consulted as non-prescribed consultees via letter and email on 20 October 2023 and a follow-up was sent via email on 07 November 2023. Two further emails were issued to 87 seldom-heard consultees specifically representing younger people, including youth networks, local youth councils, education providers and youth service providers. The letter and email contained information about the consultation, encouraged feedback and included an invitation to a youth webinar on 12 December 2023. Four people registered for this webinar, but none of them attended.

## Advertising and Publicity

- 7.4.24 Table 7.9 summarises the range of methods used to advertise the Proposed Project and the Section 47 consultation to the public.

Table 7.9 Methods of publication for Statutory consultation events

| Publication       | Date            | Details                                                                                                                                                                                                                                                      |
|-------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation pack | 20 October 2023 | A consultation pack (Newsletter, Feedback Form and freepost envelope) was posted to all residential and business addresses within the PCZ, see section 7 and 8 of <b>Application Document 5.1.6 Appendix E Statutory consultation</b> .                      |
| Letter            | 20 October 2023 | A letter containing information about the Section 47 consultation, an outline of the Proposed Project and how to respond with feedback during the consultation period was posted and/or emailed to local stakeholders, within the SCZ and beyond, including: |

| Publication                                                                          | Date                     | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                      |                          | <ul style="list-style-type: none"> <li>• elected representatives</li> <li>• ‘seldom heard groups’</li> <li>• marine users such as fisheries, developers and existing infrastructure owners</li> </ul> <p>A copy of the letter is enclosed in section 17 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p>                                                                                                                                                                                                                                                                                                                           |
| Media adverts and press releases adverts                                             | October to December 2023 | <p>Media adverts and press releases were published providing details of the Proposed Project and the consultation. Copies of the adverts and press releases are enclosed in section 18 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>. Printed and online newspapers included:</p> <ul style="list-style-type: none"> <li>• Eastern Daily Press;</li> <li>• East Anglian Daily Times;</li> <li>• Ipswich Star;</li> <li>• Kentish Gazette;</li> <li>• Kent and Sussex Courier;</li> <li>• KM Thanet Extra;</li> <li>• East Kent Mercury;</li> <li>• Isle of Thanet News;</li> <li>• Kent Live; and</li> <li>• Kent Online.</li> </ul> |
| Newspaper notices (published in accordance with Section 48 of the Planning Act 2008) | October 2023             | <p>National Grid placed the Section 48 notice (see section 9 of <b>Application Document 5.1.6 Appendix E Statutory consultation</b>) in the local and national press to publicise the Statutory consultation. Publishing details for the Section 48 notices are set out in Section 7.5 of this report and section 22 of <b>Application Document 5.1.6 Appendix E Statutory consultation</b>.</p>                                                                                                                                                                                                                                                              |
| Posters                                                                              | 4 November 2023          | <p>Posters advertising the Statutory consultation (see section 19 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>) were sent out by National Grid to display to the following Parish Councils:</p> <ul style="list-style-type: none"> <li>• Aldeburgh Town Council;</li> <li>• Ash Parish Council;</li> </ul>                                                                                                                                                                                                                                                                                                                          |



| Publication  | Date                     | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |                          | <ul style="list-style-type: none"> <li>• Benhall and Sternfield Parish Council;</li> <li>• Cliffsend Parish Council;</li> <li>• Friston Parish Council;</li> <li>• Kelsale cum Carlton Parish Council;</li> <li>• Knodishall Parish Council;</li> <li>• Minster Parish Council;</li> <li>• Saxmundham Town Council; and</li> <li>• Worth Parish Council.</li> </ul>                                                                                                                                                                                                                                                                                                                                           |
| Social media | October to December 2023 | <p>National Grid publicised details of the Statutory consultation, including reminders when and where events were taking place via National Grid's Facebook account and Instagram account. Copies of the Facebook and Instagram posts are enclosed in section 20 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p> <p>A summary of the Facebook and Instagram posts were as follows:</p> <ul style="list-style-type: none"> <li>• dates and times of public exhibitions webinars and 'Ask the Experts' sessions;</li> <li>• locations of where more detailed information about the proposals can be found; and</li> <li>• contact details for the Proposed Project team.</li> </ul> |
| Site notices |                          | <p>Site notices were placed in 17 locations in Suffolk and ten locations in Kent. A copy of the notice is provided in section 21 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## Responses to Section 47 Consultation

- 7.4.25 Following the consultation deadlines, National Grid recorded and considered all relevant responses in finalising the DCO application.
- 7.4.26 Chapter 8 summarises details of the relevant responses received from Section 47 consultees during the Statutory consultation period. As respondents online did not identify if they were responding to Section 47 consultation or Section 48 publicity, Chapter 8 discusses the relevant responses from non-Section 42 consultees which includes both Section 47 and Section 48 respondents.
- 7.4.27 Furthermore, a summary of the relevant responses received, together with details of how National Grid has considered those responses in finalising its DCO application in accordance with its duty under Section 49 of the Planning Act 2008, is provided in section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

## Conclusion

- 7.4.28 The above, Chapter 7 and **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** explain and evidence that National Grid complied with the statutory requirements for consultation under Section 47 of the Planning Act 2008 during the Statutory consultation.

## 7.5 Section 48 Publicity

- 7.5.1 This section provides an overview of how National Grid publicised the Proposed Project pursuant to Section 48 of the Planning Act 2008 and complied with Regulation 13 of the Infrastructure EIA Regulations 2017.

### Publications and Timings

- 7.5.2 As required by Section 48 of the Planning Act 2008 and Regulation 4 of the APFP Regulations, a notice (see section 9 of **Application Document 5.1.6 Appendix E Statutory Consultation**) publicising the proposed application for development consent for the Proposed Project was published between 17 October 2023 and 26 October 2023 in the London Gazette, once in a national newspaper (The Guardian), once in Lloyd's List Daily Briefing, once in a fishing trade journal (Fishing News) and for two successive weeks in a local newspaper (East Anglian Times, Kentish Gazette). Copies of the notices, as published, are enclosed in section 22 of **Application Document 5.1.6 Appendix E Statutory Consultation**.
- 7.5.3 Table 7.10 sets out details of the publications and date for the Section 48 notice.

Table 7.10 Newspapers where the Section 48 notice was published

| Publication title           | Dates of first notice | Date of second notice | Deadline provided | Copy reference                                                                        |
|-----------------------------|-----------------------|-----------------------|-------------------|---------------------------------------------------------------------------------------|
| East Anglian Times          | 17.10.2023            | 24.10.2023            | 18.12.2023        | See section 22 of <b>Application Document 5.1.6 Appendix E Statutory Consultation</b> |
| Kentish Gazette             | 19.10.2023            | 26.10.2023            | 18.12.2023        |                                                                                       |
| The Guardian                | 24.10.2023            | N/A                   | 18.12.2023        |                                                                                       |
| Lloyd's List Daily Briefing | 24.10.2023            | N/A                   | 18.12.2023        |                                                                                       |
| Fishing News                | 24.10.2023            | N/A                   | 18.12.2023        |                                                                                       |
| The London Gazette          | 26.10.2023            | N/A                   | 18.12.2023        |                                                                                       |

- 7.5.4 The Section 48 notice was sent to all Section 42(1)(a), (b) and (d) consultees on 20 October 2023 (for those who received Section 42 consultation documents by post) and on 23 October 2023 (for those who received Section 42 consultation document by email).

- 7.5.5 The Section 48 notice was also provided on the Proposed Project webpage and at 17 locations in Suffolk and ten locations in Kent. Maps of the locations can be found in section 23 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

## Content of the Section 48 Notice

- 7.5.6 As required by Regulation 4(3) of the APFP Regulations and the 2020 Regulations, the content of the notice included:
- the name and address of National Grid Electricity Transmission plc (NGET) (as National Grid);
  - a statement that National Grid intends to make a DCO application of development consent to the SoS;
  - a statement that the application is EIA development;
  - a summary of the main proposals, specifying the location or route of the proposed development;
  - a statement that the documents, plans and maps may be inspected free of charge, naming the deposit locations and opening times;
  - the address of the website where the documents, plans and maps may be inspected;
  - a telephone number (0808 134 9569) which can be used to contact National Grid for enquiries in relation to the documents, plans and maps;
  - whether a charge would be made for copies of any of the documents, plans or maps and the amount of any charge;
  - details of how to respond to the publicity; and
  - the deadline of 18 December 2023 for receipt of those responses by National Grid, being not less than 28 days following the date when the notice was last published (i.e. 26 October 2023).
- 7.5.7 A copy of the Section 48 notice is included in section 9 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

## Responses to Section 48 Publicity

- 7.5.8 As respondents did not identify if they were responding to Section 47 consultation or Section 48 publicity, Chapter 8 discusses the relevant responses from non-Section 42 consultees which includes both Section 47 and Section 48 respondents.
- 7.5.9 For detailed summaries of all relevant responses from both Section 47 and Section 48 respondents, see section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

## Section 50 of the Planning Act 2008

- 7.5.10 Section 50 of Planning Act 2008 requires National Grid to have regard to government's pre-application guidance. Chapter 8 Section 8.8, 8.9 and Table 8.7 provides an overview how National Grid had already completed non-statutory and statutory consultation before the new advice was published, therefore could not have full regard to the government's new guidance on the pre-application stage.

## Conclusion

- 7.5.11 The above explains and evidences that National Grid complied with the statutory requirements for consultation under Section 48 of the Act during the Statutory consultation.

# 8. Summary of Responses Received to the 2023 Statutory Consultation

## 8.1 Introduction

- 8.1.1 As set out in Chapter 3 of this report, Section 49 of the Planning Act 2008 sets out the duty upon National Grid to take account of responses to consultation and publicity. Under Section 49(2) of the Planning Act 2008, National Grid must have regard to any relevant responses, whilst Section 49(3) clarifies the meaning of ‘relevant responses’.
- 8.1.2 This chapter provides an overview of the relevant responses received to the Statutory consultation and provides a summary of how National Grid has had regard to those responses. Full regard is given to the feedback in sections 24 and 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** for Statutory consultation (see paragraph 8.1.3 below). Together, this Chapter and sections 24 and 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** set out how National Grid has complied with its duty under Section 49 of the Planning Act 2008 and PINS advice Nationally Significant Infrastructure Projects: Advice on the Consultation Report (2024), with regard to the Statutory consultation. This chapter is structured as follows:
- Section 8.2 summarises the consultation analysis methodology and coding undertaken by National Grid;
  - Section 8.3 analyses the feedback received during the Statutory consultation under Section 42(1)(a), Section 42(1)(b), and Section 41(1)(d) of the Planning Act 2008;
  - Section 8.4 analyses the feedback received during the Statutory consultation under Section 47 and Section 48 of the Planning Act 2008;
  - Section 8.5 provides a summary of how National Grid has had regard to relevant responses in accordance with Section 49 of the Planning Act 2008; and
  - Section 8.6 describes the evolution of the Proposed Project in response to consultation feedback and any design changes as a result of the feedback.
- 8.1.3 Section 24 of **Application Document 5.1.6 Appendix E Statutory Consultation** provides the relevant responses received from Section 42(1)(a) and (b) bodies for Statutory consultation, while section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** provides relevant extracts from the Section 47 and 48 respondents. In each Appendix, how National Grid has had regard to the relevant responses is included.
- 8.1.4 The statutory consultation followed the Planning Act 2008: Guidance on the pre-application process (March 2015), Department for Communities and Local Government’s (DCLG) ((DCLG) D. f., 2015). This Guidance has been superseded by new Guidance issued in April 2024. However, as the Statutory consultation was undertaken prior to the issue date, the March 2015 guidance was followed, see **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist** for compliance with Section 50. The April 2024 Guidance was followed for the Targeted consultation and pre-submission engagement, see Sections 9 and 10 of this report.

## 8.2 Consultation Analysis Methodology

### Number and Format of Responses

- 8.2.1 A total of 2,841 relevant responses were submitted to National Grid in response to the Statutory consultation held between 24 October 2023 and 18 December 2023. That number includes responses received after the deadline, which were accepted by National Grid on a discretionary basis.
- 8.2.2 Consultees who participated in the Q&A at the end of the online webinars, attended the public information exhibitions or spoke to members of the project team via ‘ask the experts’ sessions were informed that they should submit their relevant response to the Statutory consultation, if they wished to do so, via the feedback mechanisms set out in the publicity materials and consultation documents for them to be considered a relevant response and taken into account accordingly.
- 8.2.3 As such, any verbal comments or feedback provided via telephone, in person, via a virtual meeting or via other channels such as social media, were not considered as a relevant response and have therefore not been taken into account in the analysis. If comments on the Project were provided by email and it was not clear if the comments were intended to be a formal submission of feedback, National Grid sought to contact that person and seek clarity. National Grid took a precautionary approach in which such comments were treated as formal feedback if confirmation was not forthcoming.
- 8.2.4 Furthermore, in some instances agents acting on behalf of landowners submitted minutes of meetings held as feedback. These were accepted and the feedback included in the analysis of responses. The landowners were also invited to submit their responses via the Proposed Project email and/or by submitting a feedback form.
- 8.2.5 Responses were therefore received through the submission of feedback forms either online or via Freepost, by email, or by letter.
- 8.2.6 Table 8.1 provides a breakdown of the number of relevant responses per consultee category. As respondents online did not identify if they were responding to Section 47 consultation or Section 48 publicity, this Chapter discusses the relevant responses from non-Section 42 consultees as both Section 47 and Section 48 respondents.
- 8.2.7 It should also be noted that some consultees were notified of the Statutory consultation under two different sections of the Planning Act 2008 (e.g. they are both a Section 42(1)(a) or (b) and Section 42(1)(d) party, such as Suffolk County Council). Section 42(1)(d) parties were only able to be identified if they declared themselves as such. For the purposes of this analysis, where such consultees submitted only one relevant response, they have been counted under one category only in Table 8.1, to avoid double counting. In such circumstances, the relevant response has been assigned to the relevant category under Section 42 in the first instance.



Table 8.1 Number of responses per consultee category

| Consultee category                                                      | Number of responses |
|-------------------------------------------------------------------------|---------------------|
| Section 42(1)(a) statutory consultees (including statutory undertakers) | 50                  |
| Section 42(1)(b) relevant local authorities                             | 5                   |
| Section 42(1)(d) people with an interest in the land                    | 57                  |
| Section 47 and Section 48 consultees                                    | 2727                |

## Consultation Analysis Method

- 8.2.8 The consultation responses have been analysed in line with guidance contained within Nationally Significant Infrastructure Projects: Advice on the Consultation Report which states that “*The responses should be categorised in an appropriate way. It may be appropriate for the applicant to group responses under headline issues*”. The Section 42 feedback was analysed separately from the Section 47 and 48 responses.
- 8.2.9 For all feedback received a coding tree was developed to categorise the feedback into themes. The codes used were based on the scope of the Proposed Project and the topics considered in the Preliminary Environmental Information Report. The number of codes totalled 56 and, for ease of reference, these topics are grouped under the headings of Terrestrial, Marine, Project-Wide and Additional in Table 8.2.
- 8.2.10 A consultation response could be allocated up to three codes to highlight the different themes or elements of the Proposed Project covered. To assist the Proposed Project team in identifying which scheme was being commented on, the feedback was also categorised into either Suffolk, Kent or General. The sentiment of the comment was then added (either positive, negative or neutral) and whether the comment could be considered a suggestion.
- 8.2.11 All feedback, regardless of origin, was reviewed and assigned a code or codes. Following the coding exercise, all coding was reviewed to ensure that codes had been applied in a consistent manner.

Table 8.2 Consultation coding topics

| Topic group name | Codes                                                                                                                                                                                                                                                                                                      |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Terrestrial      | landscape and visual; terrestrial ecology; agriculture and soils; traffic and transport; air quality; noise and vibration; cultural heritage; onshore EMF; onshore mitigation; walking; cycling and horse riding; health and wellbeing; Habitat Regulations Screening Report; onshore environmental impact |

| Topic group name | Codes                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Marine           | offshore physical environment; benthic ecology; fish and shellfish ecology; marine mammals; marine archaeology; shipping and navigation; commercial fisheries; other sea users; offshore ordnance/UXO; offshore EMF; offshore mitigation; marine conservation zone assessment; offshore environmental impact; Water Framework Directive Screening Assessment                                                 |
| Project-Wide     | water environment; geology and hydrogeology; socio-economic; recreation and tourism; ornithology; climate change; design; intra-project cumulative effects; inter-project cumulative effects; combined effect of proposed project; construction – general; construction – deposition areas; construction – compound areas                                                                                    |
| Additional       | onshore route location; offshore route locations; converter station location; landfall location; consultation; alternative solutions; community benefits/enhancements; timescales/programme; DCO process; legislation and policy incl. permits; land rights and CPO; project finance/cost of scheme; needs case; coordination with other projects; safety; major accidents and disasters; Norwich to Tilbury |

## 8.3 Section 42 Consultation Feedback

- 8.3.1 National Grid issued Statutory consultation documents to a total of 182 consultees and received 108 relevant responses, equivalent to a response rate of approximately 59%. The relevant responses were received predominantly from Section 42(1)(a) parties. Table 8.3 provides a list of the codes that were applied to the relevant responses in respect of Section 42(1)(a), Section 42(1)(b) and Section 42(1)(d) parties. . The codes that occurred the most were: design; inter-project cumulative effects; alternative solutions; needs case; terrestrial ecology; cultural heritage; construction – general; legislation and policy; landscape and visual; walking, cycling and horse-riders and socio-economics, recreation and tourism. As noted above, Section 42(1)(d) parties were noted if they identified themselves as such in their response.
- 8.3.2 National Grid has reviewed each of the Section 42 relevant responses and coded them into topics in accordance with the above methodology and Table 8.3 sets out the topics that were raised in feedback from the Section 42 parties.
- 8.3.3 It should be noted that each relevant response is considered on its own merit and thus the number of relevant responses in respect of one individual topic may not correlate directly to the importance of that individual topic.
- 8.3.4 The most common topics for comment related to:
- landscape and visual;
  - needs case;
  - converter station location; and
  - onshore mitigation.

- 8.3.5 All the relevant responses, set out verbatim, received from Section 42 consultees during Statutory consultation, together with details of National Grid's regard had and how it has considered those responses in finalising its application for development consent in accordance with its duty under Section 49 of the Planning Act 2008, are provided in section 24 of **Application Document 5.1.6 Appendix E Statutory Consultation**. A summary of the feedback received is provided in Table 8.4 towards the end of this Chapter. The August 2024 guidance states that it may be appropriate for the applicant, in this case National Grid, to group responses under headline issues, therefore, the feedback in this table is grouped into themes and it is indicated whether a s42(1) respondent provided feedback on a particular theme.

Table 8.3 Section 42 respondents, Statutory consultation

| Name of s42 respondent                | Codes applied to consultation response                                                                                                                                                                                                                                                                                                            |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section 42(1)(a)</b>               |                                                                                                                                                                                                                                                                                                                                                   |
| Anglian Water                         | Consultation; design; construction – general; onshore mitigation; coordination with other projects; converter station location; DCO process; landfall location; construction – compound areas; water environment; intra-project cumulative effects                                                                                                |
| Cadent Gas                            | Consultation; onshore mitigation; traffic and transport; legislation and policy; land rights and CPO; construction – general; safety; design                                                                                                                                                                                                      |
| East Anglia ONE North                 | DCO process; consultation; onshore route location; design; intra-project cumulative effects; landfall location; offshore ordnance / UXO; timescales/programme; marine mammals; design; landscape and visual; water environment; inter-project cumulative effects; cultural heritage; onshore mitigation                                           |
| East Anglia TWO                       | DCO process; consultation; onshore route location; design; intra-project cumulative effects; landfall location; offshore ordnance / UXO; timescales/programme; marine mammals; design; landscape and visual; water environment; inter-project cumulative effects; cultural heritage; onshore mitigation                                           |
| East of England Ambulance Service     | Consultation; DCO process; safety; health and wellbeing; onshore mitigation; intra-project cumulative effects; design; converter station location; onshore route location; landfall location; construction – general; timescales/programme; offshore route location; traffic and transport; legislation and policy; major accidents and disasters |
| EDF Energy Nuclear Generation Limited | Consultation                                                                                                                                                                                                                                                                                                                                      |
| Environment Agency                    | Consultation; DCO process; onshore environmental impact; water environment; onshore mitigation; terrestrial                                                                                                                                                                                                                                       |

| Name of s42 respondent                                      | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                             | ecology; water framework directive screening assessment; coordination with other projects; geology and hydrogeology; legislation and policy; inter-project cumulative effects; construction – general; other sea users; offshore mitigation; landscape and visual; fish and shellfish ecology; design; offshore physical environment; intra-project cumulative effects; alternative solutions; climate change; converter station location; noise and vibration; traffic and transport; benthic ecology; land rights and CPO; agriculture and soils                     |
| Forestry Commission                                         | Landscape and visual; legislation and policy; agriculture and soils; air quality; terrestrial ecology; traffic and transport                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Galloper Windfarm                                           | Consultation; DCO process                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Gridlink Interconnector Ltd                                 | Needs case; design; onshore route location; converter station location; landfall location; coordination with other projects; consultation                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Harwich Haven Harbour Authority                             | Shipping and navigation; legislation and policy; timescales/programme; coordination with other projects; safety; offshore route location; design; alternative solutions; major accidents and disasters                                                                                                                                                                                                                                                                                                                                                                 |
| Health and Safety Executive                                 | Major accidents and disasters; DCO process; consultation; needs case; safety; legislation and policy; offshore ordnance / UXO                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Historic England                                            | Consultation; marine archaeology; terrestrial ecology; cultural heritage; onshore mitigation; offshore mitigation; legislation and policy; DCO process; design; coordination with other projects; construction – general; traffic and transport; agriculture and soils; water environment; onshore route location; shipping and navigation; geology and hydrogeology; offshore ordnance / UXO; offshore physical environment; landscape and visual; construction – compound areas; inter-project cumulative effects; intra-project cumulative effects; benthic ecology |
| Joint Nature Conservation Committee                         | Consultation; onshore route location; legislation and policy; offshore ordnance / UXO; offshore mitigation; marine conservation zone assessment; benthic ecology; ornithology; coordination with other projects; inter-project cumulative effects; shipping and navigation; timescale and programme; construction - general                                                                                                                                                                                                                                            |
| Kent and Essex Inshore Fisheries and Conservation Authority | Consultation; legislation and policy; benthic ecology; fish and shellfish ecology; commercial fisheries; alternative solutions; offshore environmental impact; offshore route location; marine archaeology; socio-economic, recreation                                                                                                                                                                                                                                                                                                                                 |

| Name of s42 respondent           | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                  | and tourism; construction – general; landscape and visual; ornithology; marine mammals; landfall location                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Kent Downs AONB                  | Legislation and policy; landscape and visual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Kent Fire and Rescue Service     | Consultation; construction – general; safety; design; landfall location; traffic and transport                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Marine Management Organisation   | Legislation and policy; design; consultation; offshore route location; offshore mitigation; benthic ecology; offshore environmental impact; intra-project cumulative effects; inter-project cumulative effects; benthic ecology; fish and shellfish ecology; timescales/programme; geology and hydrogeology; offshore EMF; marine mammals; noise and vibration; offshore ordnance / UXO; DCO process; ornithology; marine archaeology; shipping and navigation; commercial fisheries; marine conservation zone assessment; construction – general; habitat regulations screening                                                                                                                                                                                                                                                                                                                     |
| Maritime and Coastguard Agency   | Shipping and navigation; safety; offshore route location; design; offshore mitigation; consultation; offshore EMF                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| National Highways                | Legislation and policy; traffic and transport; safety; onshore environmental impact; walking, cycling and horse-riders                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| NATS En-route Safeguarding       | Needs case; consultation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Natural England                  | Consultation; legislation and policy; onshore environmental impact; offshore environmental impact; geology and hydrogeology; cultural heritage; landscape and visual; ornithology; intra-project cumulative effects; benthic ecology; coordination with other projects; project finance/ cost of scheme; onshore mitigation; construction – general; landfall location; design; terrestrial ecology; marine conservation zone assessment; marine archaeology; fish and shellfish ecology; marine mammals; offshore ordnance / UXO; inter-project cumulative effects; DCO process; timescales/programme; climate change; air quality; land rights and CPO; agriculture and soils; noise and vibration; habitat regulations screening; onshore route location; walking, cycling and horse-riders; offshore physical environment; offshore route location; shipping and navigation; offshore mitigation |
| Network Rail Property (Anglia)   | Legislation and policy; land rights and CPO; design                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Network Rail Property (Southern) | Legislation and policy; land rights and CPO                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Port of London Authority         | Legislation and policy; construction – general; socio-economic, recreation and tourism; offshore route location; design; consultation; inter-project cumulative effects;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Name of s42 respondent              | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | coordination with other projects; benthic ecology; shipping and navigation                                                                                                                                                                                                                                                                                                                                                                              |
| Port of Ramsgate                    | Needs case; design; shipping and navigation; offshore route location; consultation                                                                                                                                                                                                                                                                                                                                                                      |
| River Stour Internal Drainage Board | Design; onshore route location; converter station location; landfall location; coordination with other projects; onshore mitigation; water environment; terrestrial ecology; design; construction – general; consultation                                                                                                                                                                                                                               |
| Royal Mail Group                    | Consultation; legislation and policy; traffic and transport; onshore route location; design; coordination with other projects; construction – general; intra-project cumulative effects; onshore mitigation; inter-project cumulative effects; converter station location; offshore route location; design; land rights and CPO                                                                                                                         |
| Southern Gas Networks               | Onshore mitigation; DCO process                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Southern Water                      | Consultation; land rights and CPO; onshore mitigation; design; water environment; legislation and policy                                                                                                                                                                                                                                                                                                                                                |
| Suffolk & Essex Coast & Heaths AONB | Consultation; legislation and policy; coordination with other projects; DCO process; inter-project cumulative effects; landscape and visual; design; landfall location; onshore route location; offshore route location; alternative solutions; onshore mitigation; construction – general; water environment; intra-project cumulative effects; agriculture and soils; cultural heritage; socio-economic, recreation and tourism; health and wellbeing |
| Suffolk Constabulary                | Consultation; legislation and policy; onshore mitigation; safety; traffic and transport; construction – general; major accidents and disasters; project finance/cost of scheme                                                                                                                                                                                                                                                                          |
| Suffolk Local Access Forum          | Onshore route location; landscape and visual; construction – general; walking, cycling and horse-riders; converter station location; coordination with other projects; consultation; socio-economic, recreation and tourism                                                                                                                                                                                                                             |
| Suffolk Resilience Forum            | Consultation; water environment, climate change; offshore physical environment; traffic and transport; safety; coordination with other projects                                                                                                                                                                                                                                                                                                         |
| Thanet OFTO                         | Legislation and policy; offshore route location; onshore route location; consultation; design                                                                                                                                                                                                                                                                                                                                                           |
| The Coal Authority                  | Needs case; consultation                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Section 42(1)(b)</b>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Aldeburgh Town Council              | Needs case; alternative solutions; coordination with other projects; inter-project cumulative effects; socio-economic,                                                                                                                                                                                                                                                                                                                                  |



| Name of s42 respondent              | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | recreation and tourism; traffic and transport; offshore route location; landfall location; onshore environmental impact; design; terrestrial ecology; landscape and visual; combined effect of the proposed project; onshore route location; health and wellbeing; walking, cycling and horse-riders; consultation; DCO process; community benefits/enhancements                                    |
| Benhall & Sternfield Parish Council | Consultation; alternative solutions; traffic and transport; safety; walking, cycling and horse-riders; air quality; landscape and visual; converter station location; water environment; onshore mitigation; community benefits/enhancements                                                                                                                                                        |
| Dover District Council              | Consultation; onshore route location; legislation and policy; needs case; alternative solutions; converter station design; design; landscape and visual; onshore mitigation; terrestrial ecology; ornithology; onshore environmental impact; marine mammals; noise and vibration; coordination with other projects; cultural heritage; health and wellbeing; traffic and transport; benthic ecology |
| East Suffolk Council                | Consultation; legislation and policy; coordination with other projects; alternative solutions; needs case; design; onshore mitigation; community benefits/enhancements; inter-project cumulative effects; construction – general; socio-economic, recreation and tourism; landfall location; onshore mitigation; walking, cycling and horse-riders; cultural heritage and built heritage            |
| East Sussex County Council          | Walking, cycling and horse-riders; cultural heritage; health and wellbeing; socio-economic, recreation and tourism; onshore route location; design; construction – general; onshore mitigation; DCO process; legislation and policy; design                                                                                                                                                         |
| Essex County Council                | Consultation, socio-economic; recreation and tourism; traffic and transport; inter-project cumulative effects; offshore route location; coordination with other projects; Norwich to Tilbury; needs case; health and wellbeing; construction – general; landscape and visual; terrestrial ecology; air quality; onshore mitigation; community benefits/enhancements                                 |
| Friston Parish Council              | Needs case; coordination with other projects; alternative solutions; inter-project cumulative effects; health and wellbeing; consultation; water environment                                                                                                                                                                                                                                        |
| Ipswich Borough Council             | Alternative solutions                                                                                                                                                                                                                                                                                                                                                                               |
| Kelsale-cum-Carlton Parish Council  | Needs case; inter-project cumulative effects; traffic and transport; health and wellbeing; intra-project cumulative effects; coordination with other projects; consultation;                                                                                                                                                                                                                        |

| Name of s42 respondent   | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          | converter station location; socio-economics, recreation and tourism; walking, cycling and horse-riders; construction – general; safety; major accidents and disasters; air quality; terrestrial ecology; ornithology; landscape and visual; noise and vibration; water environment; climate change; cultural heritage                                                                                                                                                                                                                                                                                                                        |
| Kent County Council      | Consultation; traffic and transport; construction – general; onshore mitigation; design; land rights and CPO; walking, cycling and horse-riders; intra-project cumulative effects; socio-economic; recreation and tourism; DCO process; landscape and visual; legislation and policy; combined effect of the proposed project; health and wellbeing; community benefits/enhancements; agriculture and soils; water environment; climate change; cultural heritage; alternative solutions; onshore environmental impact; geology and hydrogeology; inter-project cumulative effects                                                           |
| London Borough of Bexley | Needs case; consultation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Medway Council           | Needs case; consultation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Minster Parish Council   | Onshore mitigation; socio-economic, recreation and tourism; onshore environmental impact; terrestrial ecology; landfall location; alternative solutions; needs case; water environment; land rights and CPO; construction – general; walking, cycling and horse-riders; consultation                                                                                                                                                                                                                                                                                                                                                         |
| Saxmundham Town Council  | Needs case; landscape and visual; community benefits/enhancements; socio-economic, recreation and tourism; alternative solutions; onshore mitigation; inter-project cumulative effects; traffic and transport; intra-project cumulative effects; landscape and visual; noise and vibration; cultural heritage; converter station location; coordination with other projects; design; terrestrial ecology; legislation and policy; design; DCO process; onshore mitigation; consultation; construction – general; walking, cycling and horse-riders; health and wellbeing; geology and hydrogeology; agriculture and soils; water environment |
| South Norfolk Council    | Consultation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Suffolk County Council   | Consultation; traffic and transport; construction – general; onshore mitigation; design; land rights and CPO; walking, cycling and horse-riders; intra-project cumulative effects; socio-economic; recreation and tourism; DCO process; landscape and visual; legislation and policy; combined effect of the proposed project; health and wellbeing; community benefits/enhancements; agriculture and soils; water environment; climate change; cultural heritage; alternative solutions; onshore environmental impact; geology and hydrogeology; inter-project cumulative                                                                   |

| Name of s42 respondent          | Codes applied to consultation response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                 | effects; coordination with other projects; needs case; converter station location; landfall location; terrestrial ecology; air quality; timescales/programme; construction – compound areas; habitat regulations screening; safety; noise and vibration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Surrey County Council           | Consultation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Thanet District Council         | Consultation; needs case; design; legislation and policy; landscape and visual; converter station location; inter-project cumulative effects; walking, cycling and horse-riders; construction – general; agriculture and soils; intra-project cumulative effects; traffic and transport; terrestrial ecology; ornithology; onshore mitigation; onshore environmental impact; air quality; noise and vibration; geology and hydrogeology; onshore route location; agriculture and soils; land rights and CPO; cultural heritage; health and wellbeing; timescales/programme; combined effect of the proposed project; climate change                                                                                                         |
| <b>Section 42(1)(d)</b>         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Landowners (feedback form)      | Alternative solutions; needs case; onshore route location; onshore environmental impact; design; construction – general; converter station location; landfall location; coordination with other projects; onshore mitigation; consultation; health and wellbeing; agriculture and soils; landscape and visual; combined effect of proposed project; community benefits/enhancements; traffic and transport; walking, cycling and horse-riders; inter-project cumulative effects; water environment; land rights and CPO; timescales/programme; geology and hydrogeology; offshore physical environment; cultural heritage; project finance/cost of scheme; ornithology; noise and vibration                                                 |
| Landowners (letters and emails) | Consultation; combined effect of the proposed project; alternative solutions; needs case; converter station location; design; geology and hydrogeology; terrestrial ecology; onshore route location; construction – general; agriculture and soils; air quality; landscape and visual; socio-economic, recreation and tourism; coordination with other projects; inter-project cumulative effects; landfall location; agriculture and soils; construction – compound areas; cultural heritage; DCO process; land rights and CPO; noise and vibration; onshore mitigation; ornithology; safety; traffic and transport; walking, cycling and horse-riders; water environment; health and wellbeing; onshore EMF; safety; timescales/programme |

## 8.4 Section 47 Consultation and Section 48 Publicity Feedback

- 8.4.1 As outlined in Section 7.4 of this report, National Grid wanted to seek the local community and key stakeholders' views on all aspects of the Proposed Project.
- 8.4.2 The Feedback Form (see section 8 of **Application Document 5.1.6 Appendix E Statutory Consultation**) included a range of open-ended and closed-ended questions on all aspects of the Proposed Project, as well as free text boxes for the public to provide comments. The Feedback Form was structured as follows:
- The Project (Questions 1 – 2)
    - question on reinforcing the network
    - question on how the Proposed Project has evolved
  - Suffolk (Questions 3 – 10)
    - question on the substation
    - question on HVAC and HVDC cable routes
    - question on the converter station and design
    - question on the landfall location
    - questions on co-location
    - general comments
  - Marine (Question 11)
    - question on marine proposals
  - Kent (Question 12 – 17)
    - question on the landfall location
    - question on HVDC cable route
    - question on the converter station, substation and design
    - question on overhead lines
    - general comments
  - Construction (Question 18)
  - Mitigation (Question 19)
  - General Project comments (Question 20)
- 8.4.3 This section of the report follows the structure of the Feedback Form. For each question, an analysis of the tick box answers is given, followed by a summary of the general commentary provided in the feedback form open text boxes, together with National Grid's regard had. This summary includes feedback received in the form of emails and letters. The summary provided is based on the coded themes that attracted the most commentary in the open text boxes and emails and letters. A summary of all the themes raised during Statutory consultation is provided in Table 8.4 towards the end of this Chapter, and section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** presents the feedback received in themes in more detail together with National Grid's regard had.

- 8.4.4 Many of the respondents raised several issues in one paragraph in their feedback. Where this has occurred, a primary code was assigned reflecting the main emphasis of the feedback and then up to two further codes could have been assigned. Therefore, more than one theme could have been discussed under a single heading. For example, a respondent could mention that an alternative solution needs to be sought by National Grid due to the impact on terrestrial ecology.
- 8.4.5 The summaries reflect the feedback received even if the feedback included factual inaccuracies. For example, some respondents have stated that Minister Marshes is a SSSI when in fact it does not have this statutory designation. Where this has occurred, National Grid has made a correction or provided an explanation regarding the error.
- 8.4.6 A copy of the Feedback Form (see section 8 of **Application Document 5.1.6 Appendix E Statutory consultation**) was available at all deposit points, online on the Proposed Project website and paper copies could be sent upon request for consultees to submit their comments about the Project. Completed Feedback Forms and/or separate comments from consultees were accepted through the following methods:
- completing the online feedback form;
  - completing a paper copy of the feedback form and returning it using the Freepost address;
  - emailing a digital copy of the feedback form to [contact@sealink.nationalgrid.com](mailto:contact@sealink.nationalgrid.com);
  - emailing or posting separate comments.
- 8.4.7 The methods in which consultees could respond to the consultation and the deadline for submission were widely publicised and made clear in the Statutory consultation documents.
- 8.4.8 Out of the 2,709 relevant responses received from Section 47 and Section 48 respondents, 1,477 of these responses were returned feedback forms and 1,232 were emails and letters. However, the overall total for feedback forms was 1,512 because some prescribed consultees including landowners filled in a feedback form. Two petitions were received in the feedback. One was a change.org online petition from Save Minister Marshes which was submitted twice. One of the submittals had 7,950 signatures and the other had 7,949 signatures. The second petition was the result of a separate paper petition. This was also submitted twice and was again from Save Minister Marshes. Here, each submittal appeared to be a different list of signatures, with approximately 1,100 signatures in total.
- 8.4.9 As responders to the Statutory consultation did not identify if they were responding to Section 47 consultation or Section 48 publicity, this section provides a summary of the feedback received from the Section 47 consultation and Section 48 publicity.

## Question 1 – ‘Do you support the principle of reinforcing the network in this location?’

### Response to Q.1

- 8.4.10 National Grid received 1,423 individual relevant responses to this question. The feedback received demonstrated that 65% of the respondents did not agree with the principle of reinforcing the network with many reasons cited such as the impact on terrestrial ecology (e.g. Minister Marshes), there is no need for the Proposed Project, the

use of an alternative site such as a brownfield site, the landscape impact, the impact on tourism in Suffolk and the impact of the construction phase on local roads. Despite this, 25% of respondents agreed that there is a need to reinforce the network in this location, with many citing the importance of reducing the UK's reliance on fossil fuels and providing a secure renewable energy supply for the future as demand increases. Several mentioned that they felt it is important to reduce the UK's reliance on other countries for energy supply, particularly for UK industry and farming. Furthermore, 10% of respondents were unsure.

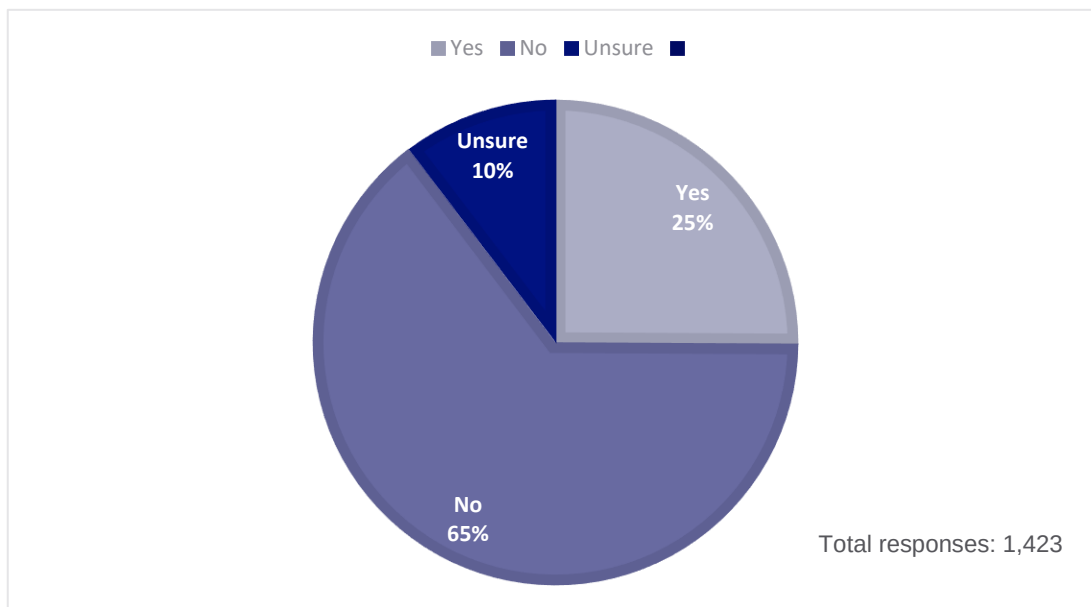


Plate 8.1 Response to Q.1 'Do you support the principle of reinforcing the network in this location?'

## General commentary about the principle of reinforcing the network between Suffolk and Kent

8.4.11 In order to identify respondents' comments on the principle of reinforcing the network between Suffolk and Kent as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- needs case;
- alternative solutions;
- terrestrial ecology; and
- coordination with other projects.

### Needs case

8.4.12 As discussed above, a quarter of respondents agreed that there is a need to reinforce the network in this location, with many citing the importance of reducing the UK's reliance on fossil fuels and providing a secure renewable energy supply for the future as demand increases.



- 8.4.13 Conversely, several respondents commented that the Proposed Project would not be needed if there was either a fully integrated grid in the North Sea or the use of brownfield sites closer to where the energy was needed giving an example of the South East, specifically the Thames Valley and London. Respondents suggested that a fully costed cost-benefit analysis for an integrated offshore grid should be undertaken. Some commented that there was no need for an increased energy supply locally and questioned the need to build all of the infrastructure in the area.
- 8.4.14 A large number of respondents suggested a coordinated review of the Proposed Project together with all the proposed transmission infrastructure that makes landfall on the East Anglian coast. Citing the findings of the East Anglia Transmission Network Reinforcement Report<sup>3</sup> by Hiorns Smart Energy Networks ('The Hiorns Report', jointly commissioned by Essex, Suffolk and Norfolk County Councils) and the Offshore Coordination Support Scheme<sup>4</sup> review, some respondents suggested that there was an opportunity to re-evaluate the required capacity and contingency for all the interdependent projects in the East of England. They commented that a review would lead to a move towards an integrated offshore grid, which would provide the most effective solution, at least in terms of cost, in the shortest possible timeframe.
- 8.4.15 On a similar theme, some respondents commented that there would be no need for the Proposed Project if pilot tests were considered taking power directly closer to where it is needed, e.g. East Anglia ONE North and East Anglia TWO pooling their energy with LionLink taking the power to Bradwell-on-Sea.

## Alternative solutions

- 8.4.16 Rather than develop greenfield sites, many respondents commented that the Proposed Project should come ashore at brownfield sites and also suggested the use of brownfield sites for the converter stations such as Bradwell, Sizewell, the Isle of Grain, Richborough, and Kingsnorth. A significant number of respondents suggested that the converter station for Suffolk should be developed at Bradwell in Essex. An alternative solution involving the development of an offshore grid and bringing the power onshore at a brownfield site or closer to where it is needed was suggested by many respondents.

## Terrestrial ecology

- 8.4.17 Some respondents commented that the principle of reinforcing the network between Suffolk and Kent was sound, but it should not be undertaken to the detriment of biodiversity. Many respondents were against development in designated sites and the following (among others) were deemed to be impacted by the development: Minster Marshes, Pegwell Bay SSSI, Sandwich Bay to Hacklinge Marshes SSSI, RSPB North Warren Nature Reserve and the Suffolk Heritage Coast. Particular comments were raised over the impact on local terrestrial ecology from development on Minster Marshes in Kent, with many respondents commenting that the Marshes are a protected

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<sup>3</sup> <https://www.essex.gov.uk/sites/default/files/2023-11/Final%20Hiorns%20report%20-%20East%20Anglia%20Transmission%20Network%20Reinforcements.pdf>

<sup>4</sup> <https://www.nationalgrid.com/the-great-grid-upgrade/sea-link#>

site which supports a variety of wildlife including many that are protected by the Wildlife and Countryside Act 1981 with key species endangered and on the Red List<sup>5</sup>.

## Coordination with other projects (Five Estuaries and North Falls)

- 8.4.18 Out of the 1,232 people that responded by email or letter, almost a third suggested a modification to the Project in order to reduce the amount of development that would be required within Norfolk for the Five Estuaries and North Falls Project. The respondents commented that by reimagining Sea Link, significant savings are possible by removing the need to construct a substation in Tendring, cables through the Dedham Vale AONB (now known as National Landscapes) and pylons in North Colchester.

## Summary of Regard

- 8.4.19 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.27 Needs case;
  - Section 25, Table 1.25 Alternative solutions;
  - Section 25, Table 1.2 Terrestrial ecology; and
  - Section 25, Table 1.28 Coordination with other projects.

## Needs case and alternative solutions

- 8.4.20 The Proposed Project is designed to meet specific network reinforcement needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030.
- 8.4.21 While the comments stating a preference for use of previously developed land are acknowledged, it remains imperative that alternative options address the overarching needs case for the Proposed Project by providing additional network capacity where it is needed. An explanation of how the design process was conducted and how the design has evolved, including the reasons why different designs were considered, is contained in **Application Document 7.2 Strategic Options Back Check Report**.
- 8.4.22 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1**

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<sup>5</sup> Despite feedback being received regarding the protected status of Minster Marshes, it does not have a statutory designation.

## Planning Statement and Application Document 6.12 Biodiversity Net Gain Feasibility Report.

- 8.4.23 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.24 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.25 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.26 National Grid has listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce environmental impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routing and siting of infrastructure and temporary works.
- 8.4.27 National Grid has engaged with other project developers in the area, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. For further information on the potential for offshore coordination, please see **Application Document 7.10 Coordination Document**.

## Terrestrial Ecology

- 8.4.28 An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. A rigorous impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.
- 8.4.29 Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. The requirement is contained within **Application Document 7.5.3.1 Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Furthermore, following Statutory consultation the proposed construction compound in the Pegwell Bay area has been reduced in size and

has been moved further away from the mentioned Statutory designations. This has also helped to lessen the impact on nearby relevant receptors and residential properties and also on the flood zone. This revised design was presented at Targeted consultation.

- 8.4.30 The Proposed Project is also committed to achieving 10% Biodiversity Net Gain even though this is not a legal requirement at present. Further details relating to the ecology assessment are contained in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**. Further details regarding Biodiversity Net Gain are contained in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.

### Coordination with other projects (Five Estuaries and North Falls)

- 8.4.31 National Grid (the Proposed Project), North Falls (Offshore Wind Farm) and Five Estuaries (Offshore Wind Farm) have been working together to explore the potential for offshore coordination as part of the Offshore Transmission Network Review 'Early Opportunities' workstream. The projects, acting together in a consortium led by North Falls, were awarded funding by the Department of Energy Security and Net Zero through the Offshore Coordination Support Scheme in December 2023.
- 8.4.32 On 28 March 2024, the consortium submitted a high-level feasibility study that formed the first step of the grant funding agreement. The study assessed the feasibility of a coordinated offshore connection specifically: the capital costs; building blocks; construction and commissioning methodologies and overall programme associated with a coordinated solution.
- 8.4.33 The Secretary of State for Energy Security and Net Zero has reviewed this study, amongst other information and on 03 September 2024 decided not to grant further funding to the consortium. The feasibility study identified that coordination is technically feasible however, it also identified:
- an increase in capital costs of up to £890 million;
  - constraint costs associated with an outage on the Proposed Project of over £500 million (this figure is attributed to the constraint costs associated with an outage on the Proposed Project in 2032/33 only); and
  - a programme delay for North Falls and Five Estuaries of up to five years.
- 8.4.34 Given the significant extra costs and the negative impact on the delivery timeline of connecting more renewables to the UK energy system, especially considering the government's commitment to quadruple offshore wind and fully decarbonise the UK's electricity system by 2030, the consortium supports the Secretary of State's decision and will not be further pursuing a coordinated offshore connection.

## Question 2 – 'What do you think about how our proposals have evolved? Do you think this is an improvement on what we presented previously?'

### Response to Q.2

- 8.4.35 National Grid received 1,215 individual relevant responses to this question. Approximately half the respondents thought that the changes that had been made to the Proposed Project since inception were negative. However, 11% of those who answered

thought the changes were positive and 9% thought the changes were broadly positive but still needed some refinement, whilst 29% thought the changes were neither negative nor positive.

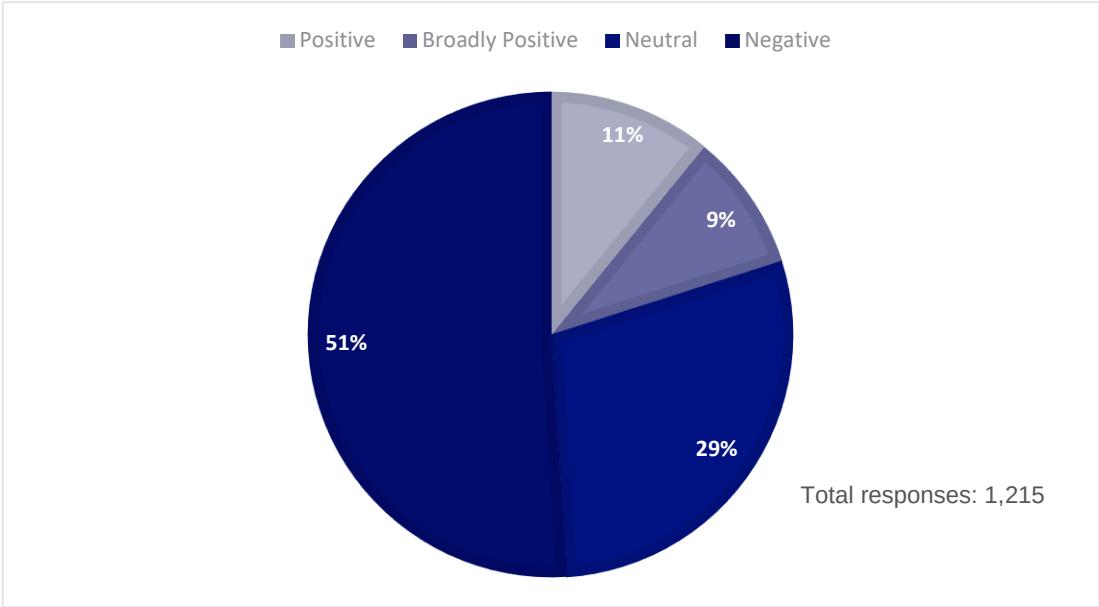


Plate 8.2 Response to Q.2 ‘What do you think about how our proposals have evolved? Do you think this is an improvement on what we presented previously?’

General commentary about how the proposals have evolved

8.4.36 In order to identify respondents’ comments on how the Proposed Project has evolved and whether it is an improvement on what National Grid had presented before, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions;
- consultation; and
- DCO process.

Alternative solutions

8.4.37 Similarly with question 1, respondents commented that National Grid should consider developing the Proposed Project entirely offshore or use brownfield sites instead of building onshore infrastructure in the countryside. Many people suggested that the Proposed Project should not go ahead as planned on greenfield sites. Suggestions were made to reconsider the project design so that all infrastructure within Suffolk is sited at Sizewell instead as this area has already been impacted by development. It was felt that development at Sizewell would eliminate the need to damage SSSIs, AONBs and RSPB reserves. A significant number of respondents commented that the converter station for Suffolk should be developed at Bradwell in Essex.

8.4.38 Others commented that the proposals were necessary and that National Grid had appeared to avoid human settlements and existing farmland where possible, and that the Project had less of an environmental impact on the area.



## Consultation

- 8.4.39 Some respondents commented that previous feedback submitted to National Grid regarding the use of brownfield sites and assessing development offshore had not been taken on board by National Grid, and that National Grid had ignored concerns at all stages of previous consultation, highlighting the result of the Non-statutory consultation exercise where data showed the Proposed Project was not supported by a large number of respondents. Some commented whether the consultation process had merit or whether it was just a ‘tick box exercise’.

## DCO process

- 8.4.40 It was commented by some respondents that National Grid had ignored the findings of the Scottish Power examinations for East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm citing that a clear example is the absence of any consideration of the Examining Authorities’ comments concerning “utmost care”. It was also suggested that the terms of the Scottish Power DCOs had been ignored with regard to working on a Saturday and routing construction traffic along narrow country roads.

## Summary of regard

- 8.4.41 The objective of the following paragraphs is to provide a summary of National Grid’s regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.25 Alternative solutions; and
  - Section 25, Table 1.35 Consultation.

## Alternative solutions

- 8.4.42 The Proposed Project is designed to meet specific network reinforcement needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030.
- 8.4.43 While the comments stating a preference for use of previously developed land are acknowledged, it remains imperative that alternative options address the overarching needs case for the Proposed Project by providing additional network capacity where it is needed.
- 8.4.44 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1**



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- 8.4.45 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.46 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.47 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.48 National Grid has listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce environmental impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routing and siting of infrastructure and temporary works.

## Consultation

- 8.4.49 National Grid has listened extensively to the views of stakeholders and the general public throughout the development of its proposals. As part of the Statutory consultation in 2023 it set out how it had responded to the key themes from Non-statutory consultation feedback which can be found on pages 29 and 30, see section 4 of **Application Document 5.1.6 Appendix E Statutory consultation**. National Grid has also prepared a Non-Statutory Consultation Report which was part of the consultation materials during Statutory consultation (see section 1 of **Application Document 5.1.4 Appendix C Non-Statutory Consultation**). This report provided further detail on the response it received to the consultation and how this had informed the development of the proposals.
- 8.4.50 Relevant information submitted with the East Anglia ONE North and East Anglia TWO DCO examinations has been reviewed and has informed the production of the Proposed Project Environmental Statement where relevant. This has included the review and adoption of several of the representative viewpoint locations to inform the assessment on visual amenity of the Suffolk Onshore Scheme. This is shown on **Application Document 6.4.2.1 Landscape and Visual**. Outline landscape mitigation which is shown on **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk** has been prepared with reference to the East Anglian ONE North and TWO landscape plans. Impacts on the setting of heritage assets have also been assessed and are detailed in **Application Document 6.2.2.3 Part 2 Suffolk**

**Chapter 3 Cultural Heritage.** This included a review of the East Anglia ONE North and TWO assessments and viewpoints considered as part of their assessment.

- 8.4.51 The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:
- Monday – Friday: 0700 to 1900; and
  - Saturday, Sunday and Bank Holidays: 0700 to 1700.
- 8.4.52 The working hours are secured through Requirement 7 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.53 The traffic impact assessment has considered data from the SPR study and all traffic assessments have been undertaken in consultation with East Suffolk Council and Suffolk County Council's highways engineers. Further information is contained in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**.

## Question 3 (Suffolk) – ‘What do you think about our proposal to connect into the existing network via the proposed Friston substation?’

### Response to Q.3

- 8.4.54 The majority of respondents to question 3 (62%) thought that the proposed Friston Substation was not the best place to connect into the network. Those that had no preference made up 30% of respondents and those that thought it was the best place to connect totalled 8%.

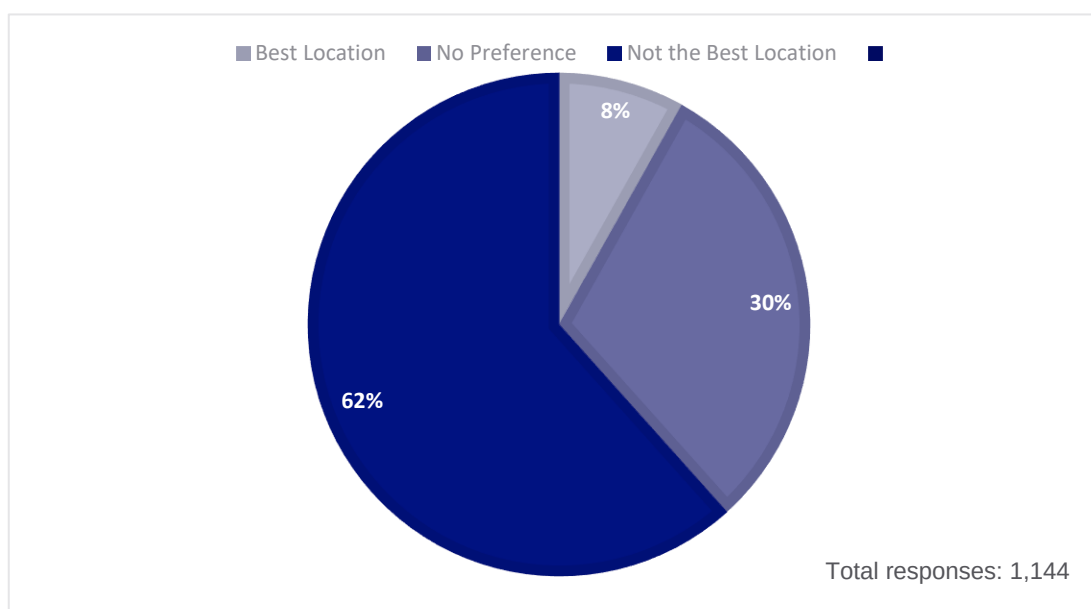


Plate 8.3 Response to Q.3 ‘What do you think about our proposal to connect into the existing network via the proposed Friston substation?’

## General commentary on proposal to connect into the existing network via the proposed Friston substation

- 8.4.55 National Grid received 1,144 individual relevant responses to this question on the Feedback Form. In order to identify respondents' opinions on the proposal to connect into the existing network via the proposed Friston Substation as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:
- alternative solutions; and
  - onshore environmental impact.

### Alternative solutions

- 8.4.56 Many of the respondents commented regarding the development at Friston that the connection into the network should be elsewhere due to the fact that Friston is a small, medieval, rural village with limited road infrastructure. Additionally, the fact that the village is subject to flooding was commented on by several respondents. Some suggested that development at Friston would mean the onward connections would be across agricultural land and areas of terrestrial ecological importance and so the location was the wrong place for a substation.
- 8.4.57 With regard to alternatives, among the solutions suggested were to build on a brownfield site such as Bradwell, Sizewell, or build offshore. The fact that there is an outstanding Judicial review challenge regarding the Scottish Power Renewables Substation at Friston, which is part of the East Anglia ONE North<sup>6</sup> Offshore Windfarm and the East Anglia TWO Offshore Windfarm, was mentioned as a reason why development at Friston was not a good option. However, since the closure of Statutory consultation, the Court of Appeal has rejected the outstanding legal challenge and both Orders remain extant and are expected to be implemented by SPR. Furthermore, some respondents stated that there is no capacity to transmit from Friston to the areas where the energy is needed.

### Onshore environmental impact

- 8.4.58 Comments on the potential environmental impact of development at Friston were very much linked with the comments on alternative solutions. Many respondents did not agree that Friston was the right place for development due to the fact that they perceived the Proposed Project to have a significant impact. Comments included the potential impacts on terrestrial ecology; the landscape setting of the area and the visual impact of the buildings themselves; noise and light pollution; increased construction traffic on the local road network causing congestion; and the impact on tourism. One respondent suggested that the construction and presence of large-scale energy infrastructure, including the large substation, will irreparably mar the natural beauty that defines this area. Moreover, the potential damaging impact on tourism, a vital source of income for the Suffolk coast, could be substantial, affecting the livelihoods of many local businesses and residents.

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<sup>6</sup> The East Anglia ONE North Offshore Wind Farm Order 2022 and the East Anglia TWO Offshore Wind Farm Order 2022.

- 8.4.59 The respondents in support of the proposals at Friston commented that they offered the least negative impact on the Suffolk countryside. It was suggested by some that the site was away from housing in open land close to existing infrastructure making connections easier and also fitting it with the Scottish Power Renewables project. Some respondents that supported the site, suggested measures should be taken to provide adequate road access and take into consideration local wildlife and landscape impacts.

## Summary of Regard

- 8.4.60 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.25 Alternative solutions; and
  - Section 25, Table 1.43 Environment – general.

## Alternative solutions

- 8.4.61 Concerns regarding development of the Friston Substation are acknowledged and National Grid confirms that a comprehensive EIA has been undertaken culminating in the production of an ES to accompany the DCO application (**Volume 6 Environmental Statement**).
- 8.4.62 The potential impact of the Proposed Project on the local road network is assessed in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. The assessment demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network. Impacts associated with the operational and maintenance phase were scoped out of the assessment on the basis that the vehicle movements associated with this phase will be infrequent and low.
- 8.4.63 Flooding concerns are noted. **Application Document 6.8 Flood Risk Assessment** has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** secured through Requirement 6 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.64 A complete assessment of the impacts on agriculture in Suffolk has been undertaken. This is set out in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils**.
- 8.4.65 The potential impacts on terrestrial ecology are provided in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
- 8.4.66 The mitigation measures proposed are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**). The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1**

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- 8.4.67 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites.
- 8.4.68 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.69 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.70 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.

### Onshore environmental impact

- 8.4.71 Environmental impacts were a key part of the consideration of the route and siting work that has been undertaken for the Proposed Project. Further detail can be found in **Applicant Document 8.2 Options Selection and Design Evolution Report (October 2023)**. The potential impacts of the Proposed Project have been assessed in **Application Document Volume 6 Environmental Statement**.
- 8.4.72 Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.

## Question 4 (Suffolk) – ‘What do you think about our proposed HVAC cable route in Suffolk?’

### Response to Q.4

- 8.4.73 The feedback received demonstrated that just over half of the respondents did not agree with proposed HVAC cable route in Suffolk, with 30% unsure. The remaining

respondents either agreed with some elements but not others or were supportive of the proposals and thought it was the best cable route.

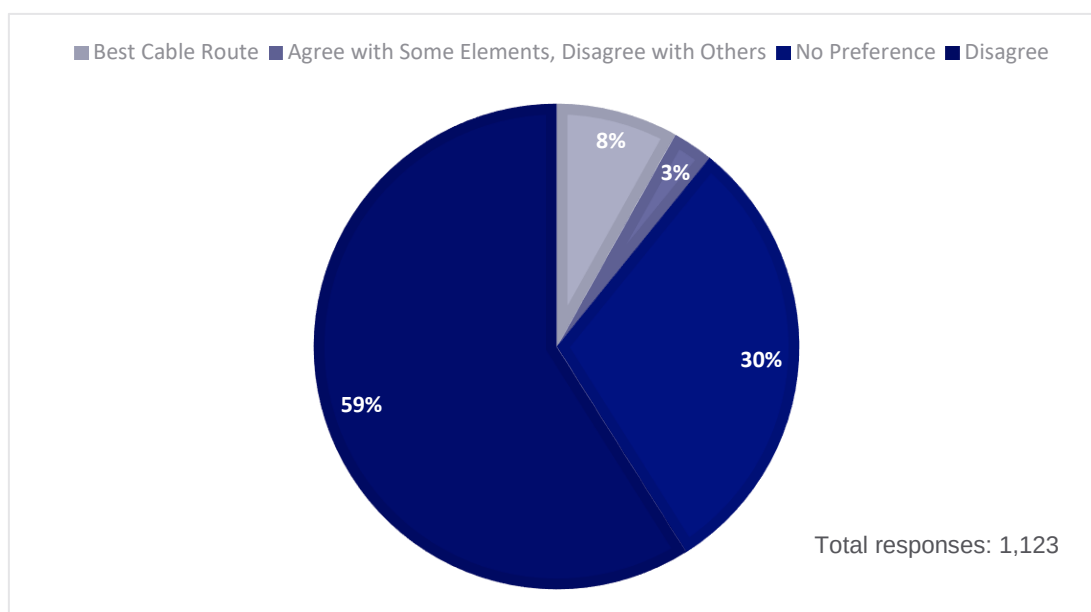


**Plate 8.4 Response to Q.4 'What do you think about our proposed HVAC cable route in Suffolk?'**

### General commentary on proposed HVAC cable route in Suffolk

8.4.74 National Grid received 1,123 individual relevant responses to this question and many of those did not provide comments and just used the tick box answers. As stated above, from the tick box answers it can be seen that over half of the respondents did not agree with the route. Any comments made were reviewed in order to identify respondents' opinions on the proposed HVAC cable route in Suffolk as presented at the Statutory consultation. These comments were categorised into the topics listed in Table 8.2. Out of the commentary made by respondents, the themes that attracted the most comments were:

- needs case;
- landscape and visual; and
- alternative solutions.

#### Needs case

8.4.75 Many respondents commented on the proposed cable route and suggested that the route between the proposed Friston Substation and the proposed converter station (near Saxmundham) would not be needed if the power could be transmitted via the existing network. They went on to suggest that the connection to the network should be elsewhere or from windfarms to an offshore network.

8.4.76 Several respondents commented asking why the power needed to be brought onshore in Suffolk and suggested that the connection should be elsewhere or from wind farms directly to an offshore network.



## Landscape and visual

- 8.4.77 Respondents' comments regarding the potential landscape and visual impact of the cable route were largely regarding the fact that the area is an AONB. One respondent suggested that the Proposed Project will have a short-term detrimental effect on the local economy in the area because tourism will be affected. One respondent welcomed the undergrounding of cables from the landing point to the substations; however, they commented they had concerns regarding the impact on the special landscape of the area and wished to have assurance that this is minimised and suitable mitigation is put in place.

## Alternative solutions

- 8.4.78 Respondents' comments relating to alternative solutions for the cable route were linked to the locations of the substation and converter station and hence the need for the cabling. For example, many respondents suggested that the substation and converter station should be relocated to a brownfield site and then the question of cable routes would be a very different one; there would be no need for the HVAC cabling in its current route if the sites were relocated. Potential sites for relocation mentioned by respondents were Sizewell and Bradwell, or taking the power directly to Kent. The use of brownfield sites was stated to be better for the local communities and the environment.
- 8.4.79 One alternative solution suggested by a respondent involved taking the HVAC produced by the wind farms and converting it offshore to HVDC using an unmanned convertor similar to the Dogger Bank wind farms with a capacity of 3.6 GW that can then be transported undersea to where the electricity is required.

## Summary of Regard

- 8.4.80 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.27 Needs case;
  - Section 25, Table 1.25 Alternative solutions; and
  - Section 25, Table 1.1 Landscape and visual.

## Needs case and alternative solutions

- 8.4.81 The Proposed Project is designed to meet specific network reinforcement needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030. Where National Grid has a converter station which changes the energy from DC to AC, they then need to connect it back to its system at the nearest AC substation. There is no alternative network which could accommodate the high levels of energy (circa 2 gigawatts) that this Proposed Project seeks to deliver.
- 8.4.82 While the comments stating a preference for use of previously developed land are acknowledged, it remains imperative that alternative options address the overarching needs case for the Proposed Project by providing additional network capacity where it is needed.

- 8.4.83 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.84 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.85 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.86 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.87 National Grid has listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible.

## Landscape and visual

- 8.4.88 The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**. The assessment takes into account the Natural Beauty indicators and the relevant associated Suffolk Coast and Heaths AONB indicators relating to natural beauty indicators to landscape and visual matters. The effects on the Suffolk Heritage Coast are also detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.
- 8.4.89 Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental**

**Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

8.4.90 It is of note that an initial ground investigation survey has been undertaken to provide information to confirm the viability of a trenchless solution for the Suffolk landfall. Details are contained in Appendix A of **Application Document 7.3 Design Development Report**. This construction solution will minimise potential impacts on the section of the Suffolk Coast and Heaths AONB that it is used in. National Grid's commitment to the trenchless solution is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

8.4.91 A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism**. The chapter concludes that there are no anticipated likely significant effects on tourism as a result of the Proposed Project.

## Question 5 (Suffolk) – ‘What do you think about our proposed converter station, including its proposed location?’

### Response to Q.5

8.4.92 When asked what people thought of the proposed converter station location in Suffolk, those who had no preference totalled almost a third and those who thought the converter station was in the wrong location totalled almost two-thirds largely due to the scale of the converter station in a rural location. Out of those that answered, 7% thought the converter station was in the right location.

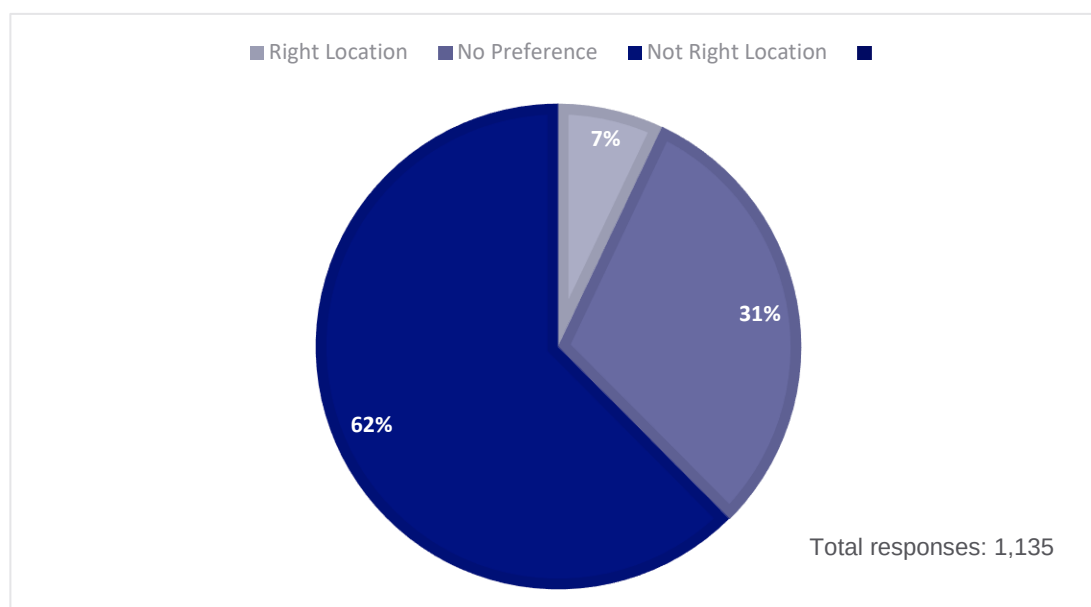


Plate 8.5 Response to Q.5 ‘What do you think about our proposed converter station, including its proposed location?’

## General commentary on proposed converter station, including its proposed location

8.4.93 National Grid received 1,135 individual relevant responses to this question. In order to identify respondents' opinions on the proposed converter station, including its proposed location in Suffolk as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions;
- needs case;
- coordination with other projects;
- landscape and visual; and
- traffic and transport.

### Alternative solutions and needs case

8.4.94 Many respondent comments relating to alternative solutions were linked to the need for the Proposed Project. Several respondents suggested that the converter station would not be needed if alternative solutions were developed such as offshore or to a site nearer to where the energy is needed. Of the respondents that commented that the converter station is in the wrong location, many also suggested that the Proposed Project should be located on brownfield sites. As with previous questions, Bradwell and Sizewell were suggested. Suggestions were also received regarding taking the power directly to Kent.

8.4.95 One respondent commented that the Suffolk coast and its inland parishes are highly unsuitable for the converter and substations. Concerns were raised over the effect of multiple developments in the area of Saxmundham and Friston. Development at brownfield sites was also called for.

### Coordination with other projects

8.4.96 Several respondents commented regarding the possibility of siting up to three converter stations in the one area. Suggestions made were that the development would be completely out of proportion to the surrounding landscape destroying the character of the area and the difficulties with road access and construction traffic movements.

8.4.97 One respondent stated that the potential plan to accommodate two further converter stations at Saxmundham did not constitute coordination. The respondent felt this would lead to further destruction of countryside, contributing to more industrialisation in a rural region and an additional landscape impact.

### Landscape and visual

8.4.98 Many respondent comments were received regarding the landscape and visual impact of the proposed converter station. Comments suggested it would be very visible and out of place in the green, flat landscape and would be conspicuous for miles. Respondents commented regarding the impact on both the setting of the local residential areas of Saxmundham and Sternfield, and the impact on the wider landscape character of the area going from a rural landscape to an industrial one. One respondent commented that such a huge industrial building is totally out of keeping with the character and landscape

of rural East Suffolk, where the local architecture is predominantly of low build and another respondent commented the appeal of the quiet Suffolk village with its medieval church, village green, historic windmill and wildflower meadow, will be overshadowed by an eyesore, permanently changing the landscape of this peaceful rural area.

- 8.4.99 With regard to shielding the converter station with planting, some respondents commented that planting would not be effective due to the scale of the building and suggested that new trees would take many years to reach the required cover and density. It was also suggested that planting of adequate tree or hedge line needs to be implemented ahead of the construction so that these can become established as soon as possible to hide and minimise any impact of the view of the area and to make this as appealing as possible.

## Traffic and transport

- 8.4.100 Numerous respondents to the Feedback Form commented on the suitability of the local road network around the proposed converter station site for construction traffic suggesting the fact that the roads are a rural, narrow and the network was not built for industrialisation of the area. Some respondents suggested that adding movements of HGVs and commercial vehicles to already busy roads was not suitable.
- 8.4.101 Of the written correspondence received during the statutory consultation period, a large number of respondents commented on traffic and transport as a key issue of concern. When looking at all the projects planned in the area, one respondent commented that traffic generated by these projects will majorly impact its residents and suggested that insufficient road infrastructure and a lack of assessment of traffic routes by all the planned projects in the area as two reasons why.
- 8.4.102 One respondent commented that the road system in the area is barely handling the present traffic and the Sea Link proposals pay no regard to this. In particular, the roads are narrow in places and unsuitable for abnormal loads.
- 8.4.103 A number of respondents residing in Suffolk listed the traffic concerns for the Proposed Project as:
- local road network unsuitable for the high traffic levels;
  - disruption from access roads north and south of Saxmundham;
  - narrow B roads unable to take abnormal loads;
  - fly parking by workers;
  - cumulative impact from other projects not considered;
  - damage to verges and roadside drainage;
  - danger to pedestrians and cyclists;
  - emergency services response further increased;
  - jeopardizing nuclear evacuation route;
  - disruption to everyday life, e.g. home deliveries, school runs, medical appointment;
  - carer visits;
  - loss of trade, impact on business due to late deliveries;

- reduction of tourist visitor income;
- loss of quiet lanes;
- limited individual access to roads to towns and villages east of the A12;
- increased danger threat to local residential traffic;
- emergency services will be delayed as roads become gridlocked; and
- the construction of Sizewell C, Friston substations and a Saxmundham converter station will be occurring simultaneously amounting to hundreds of extra vehicles every day on these rural roads.

8.4.104 Other respondents commented that the local road network is totally inadequate for this proposed ‘industrialisation’ as it is based on the historic, intricate local pattern of rural ownerships and villages. The expected huge increase in the number and size of vehicles on the local roads would undoubtedly mean that emergency vehicles would be delayed in their tasks and there would be a substantial increase in the danger to cyclists and pedestrians, the latter particularly when trying to cross busy local roads.

## Summary of Regard

8.4.105 The objective of the following paragraphs is to provide a summary of National Grid’s regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:

- Section 25, Table 1.27 Needs case;
- Section 25, Table 1.25 Alternative solutions;
- Section 25, Table 1.28 Coordination with other projects;
- Section 25, Table 1.1 Landscape and visual; and
- Section 25, Table 1.7 Traffic and transport.

## Needs case and alternative solutions

8.4.106 The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. National Grid’s publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.

8.4.107 The needs case for the Proposed Project has identified that a connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:

- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);**



- **Application Document 8.3 Strategic Options Report (October 2023);**
- **Application Document 7.2 Strategic Options Back Check Report;**
- **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
- **Application Document 7.10 Coordination Document; and**
- **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

- 8.4.108 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure.
- 8.4.109 The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.110 The cumulative impact of the Proposed Project together with other projects in the area is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects**.

### Coordination with other projects

- 8.4.111 National Grid has engaged with other project developers seeking to identify opportunities for co-ordination whilst maintaining obligations to facilitate network connection agreements by providing the required network reinforcement. If converter stations are not co-located, then it will be necessary to find locations for up to two other converter station sites in the surrounding area which meet the requirements for the connection agreements, whilst taking into account landscape designations and other sensitive receptors.
- 8.4.112 National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities (**Application Document 7.10 Coordination Document**).

### Landscape and visual

- 8.4.113 The effects arising from the Suffolk Onshore Scheme on the local landscape are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and detailed within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment**. The assessment takes into account the Natural Beauty indicators and the relevant associated Suffolk Coast and Heaths AONB indicators relating to natural beauty

indicators to landscape and visual matters. The effects on the Suffolk Heritage Coast are also set out within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.

- 8.4.114 Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Application Document 3.1 draft Development Consent Order.
- 8.4.115 National Grid acknowledges that it will take some time for planting to establish. The mitigation planting heights that have been used within the year 15 photomontages were informed by arboriculture specialists and evidence of growth rates from a local planting scheme near to the Suffolk Onshore Scheme provided by East Suffolk Council. Such planting heights are set out within **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology**. These growth rates are considered to be conservative and have considered the future requirements of climate resilience with the variety of species proposed within the indicative species mixes. Further details on the mitigation planting should be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**.

## Traffic and transport

- 8.4.116 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** 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, with the mitigation identified within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**. Further details are contained in Table 1.7 of Section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation**.

## Question 6 (Suffolk) – ‘We have identified several design approaches for the proposed converter station. Which approach(es) would you like to see explored at later design stages?’

### Response to Q.6

8.4.117 For question 6, respondents were able to select more than one option. The majority of respondents selected ‘green roof’ as the preferred design approach to take forward, followed by ‘colour’, ‘colour and curve’ and ‘agricultural barns’. The least selected options were ‘enhanced elevations’ and ‘kinetic’.

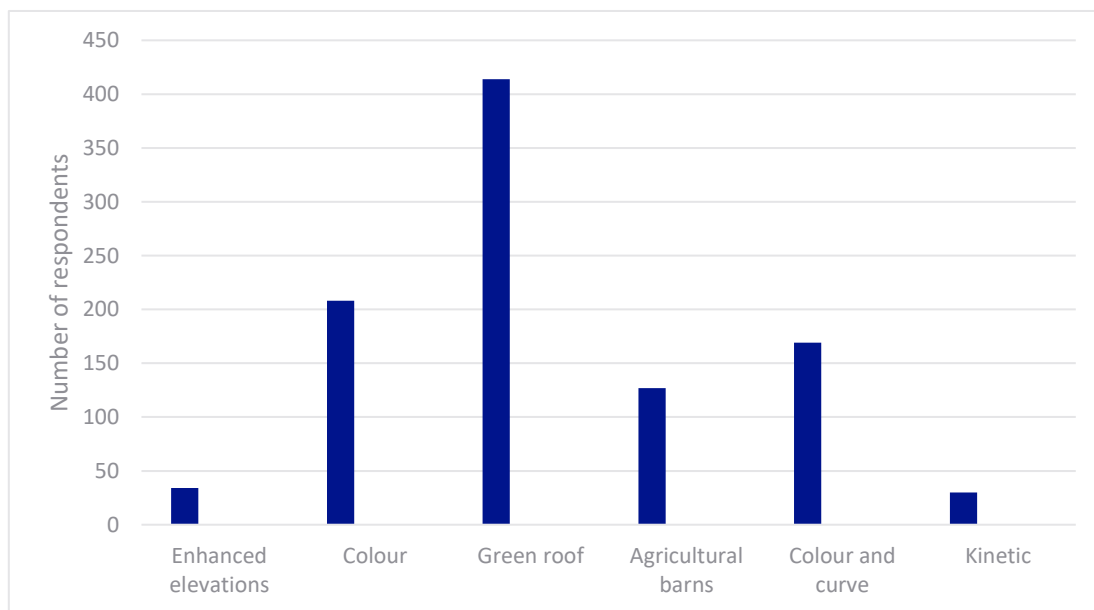


Plate 8.6 Response to Q.6 ‘We have identified several design approaches for the proposed converter station. Which approach(es) would you like to see explored at later design stages?’

### General commentary on the design approaches for the proposed converter station

8.4.118 In order to identify respondents’ opinions on the design approaches for the proposed converter station as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions; and
- landscape and visual.

#### Alternative solutions

8.4.119 Many respondents commented that the Saxmundham Converter Station should not be built in this location and that the Proposed Project should be developed on brownfield sites or offshore. Suggestions were again made to develop at Sizewell or Bradwell, or closer to where the power is needed.

8.4.120 An option of siting the Saxmundham Converter Station at a lower level by excavation was also suggested.

## Landscape and visual

- 8.4.121 When selecting ‘green roof’ and ‘agricultural barns’ as design options, many respondents commented that this design choice would help the converter station to blend in with its surroundings and be less intrusive. However, numerous respondents commented that no design solution would help mitigate the impact of the converter station given its proposed height and that they thought it could never be adequately landscaped or blended into the surrounding area.
- 8.4.122 Linked with alternative solutions, one respondent commented that none of the proposed designs will mask the fact that an industrial building 26 m high will be constructed on a 6.5 hectare site on agricultural land, and doing this when there are better, cheaper, more efficient and less damaging offshore options available.

## Summary of Regard

- 8.4.123 The objective of the following paragraphs is to provide a summary of National Grid’s regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.25 Alternative solutions; and
  - Section 25, Table 1.1 Landscape and visual.

## Alternative solutions

- 8.4.124 The Proposed Project is designed to meet specific network reinforcement needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030.
- 8.4.125 While the comments stating a preference for use of previously developed land are acknowledged, it remains imperative that alternative options address the overarching needs case for the Proposed Project by providing additional network capacity where it is needed.
- 8.4.126 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites such as Sizewell and Bradwell. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.127 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.128 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around

the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.

- 8.4.129 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.130 It is not possible to accommodate all of the infrastructure underground due to the ground conditions and the nature of the technology being used in the converter station. National Grid is taking a comprehensive masterplanning approach towards the development of the converter station site, seeking to utilise the site's topography and natural features within the design as much as possible, to lessen the visual impact. Landscape planting required for screening will be undertaken in advance of construction wherever possible. However, it should be acknowledged that such measures take time to establish, meaning that there will be some residual effects will remain.
- 8.4.131 Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:
- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);**
  - **Application Document 8.3 Strategic Options Report (October 2023);**
  - **Application Document 7.2 Strategic Options Back Check Report;**
  - **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
  - **Application Document 7.10 Coordination Document; and**
  - **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

## Landscape and visual

- 8.4.132 The effects arising from the Suffolk Onshore Scheme on the local landscape are summarised within **Application Document 6.2.1.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**. The assessment takes into account the Natural Beauty indicators and the relevant associated Suffolk Coast and Heaths AONB indicators relating to natural beauty indicators to landscape and visual matters. The effects on the Suffolk Heritage Coast are also set out within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.
- 8.4.133 **Application Document 7.12.1 Design Principles – Suffolk and Application Document 7.11.1 Design Approach Document - Suffolk** provide information on the

objectives of the design process for the Proposed Project including the Saxmundham Converter Station.

## Question 7 (Suffolk) – ‘What do you think about our proposed HVDC cable route in Suffolk?’

### Response to Q.7

8.4.134 In response to question 7, when respondents were asked what they thought about the proposed HVDC cable route in Suffolk, over half disagreed with the proposed cable route, and around a third had no preference. The remaining either agreed with some elements but not others or were supportive of the proposals and thought it was the best cable route.

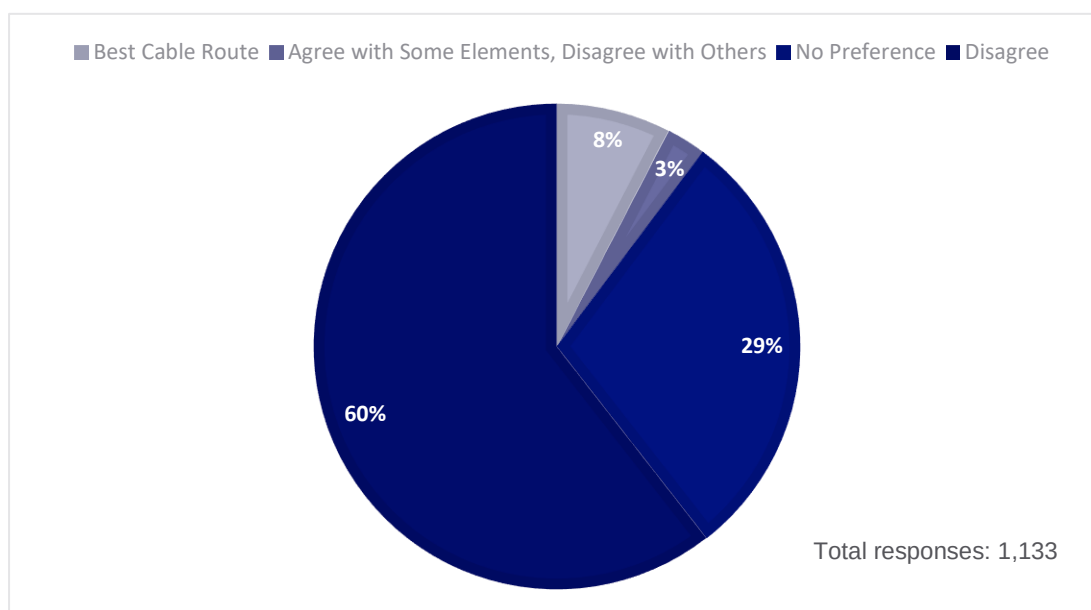


Plate 8.7 Response to ‘What do you think about our proposed HVDC cable route in Suffolk?’

### General commentary on the proposed HVDC cable route in Suffolk

8.4.135 National Grid received 1,133 individual relevant responses to this question. In order to identify respondents’ opinions on the proposed HVDC cable route in Suffolk as presented at the 2023 consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions;
- needs case;
- combined effect of the Proposed Project; and
- terrestrial ecology.

### Alternative solutions



- 8.4.136 As with the answers to question 4, many respondent comments relating to alternative solutions for the HVDC route were linked to the locations of the substation and converter station and hence the need for the cabling. For example, many respondents suggested that an offshore solution be developed with the use of brownfield sites for any required onshore infrastructure. Potential sites for relocation suggested by respondents were Sizewell and Bradwell or taking the power directly to Kent. One respondent commented if an offshore converter station was installed near the windfarms just like they are on the other side of the North Sea, National Grid could take the cable from the offshore converter station direct to Kent. They stated that this could save destroying the landscape of the Suffolk coast and save cost at the same time.
- 8.4.137 Further respondent comments were received regarding combining the infrastructure at Sizewell. It was suggested that all of the electrical infrastructure for Sea Link, LionLink and Scottish Power should be kept in one power generating centre, namely Sizewell, and central government should be banging heads together in order to facilitate such an outcome. Also, on the subject of coordination, respondents suggested that National Grid coordinates with the many other similar projects planned in the area and work together on a strategic, scalable, future proof solution that respects the environment and communities.

## Needs case

- 8.4.138 Many respondents commented that none of the cabling would be needed if other solutions were developed. They cited the potential negative impacts on wildlife, landscape, the environment, local road network, people's lives and tourism. It was suggested by some respondents that the cable route would be unnecessary if power were taken onshore further south or connections made offshore. It was commented that the Suffolk Heritage coast is an inappropriate location for such development due to the designated landscapes and nature reserves, which in turn attract many visitors to the area.

## Combined effect of the Proposed Project

- 8.4.139 When discussing the potential impacts of the Proposed Project, many respondents commented on the range of impacts they thought the cable route would have such as disruption to local residents in tranquil residential areas, impact on local roads, impact on local tourism, impact on dark skies and internationally important wildlife habitats such as RSPB reserves, AONBs and SSSIs. Specific components of the Proposed Project were mentioned such as the joint bay, haul roads, workers compounds/parking, areas for spoil and equipment access and trenching across farm land.

## Terrestrial ecology

- 8.4.140 Comments were raised by some respondents over the impacts of the cable route on terrestrial ecology especially in relation to width of the cable corridor and the fact that it would be routed through designated wildlife sites resulting in a loss, and fragmentation, of hedgerows and trees. Several respondents commented that there is a presence of species of note such as the nightingale, red-legged partridge, Dartford warbler, linnet, water vole, brown long-eared bat, noctule bat and yellow-necked mouse.
- 8.4.141 Some respondents commented on the cumulative impacts on terrestrial ecology from the Proposed Project together with other projects in the area.

- 8.4.142 One respondent commented that there is a diverse range of priority habitats, such as deciduous woodland, traditional orchards, acid grassland, and hedgerows lying within the wider corridor boundary, and that these habitats provide landscape connectivity and support a huge variety of important wildlife. They went on to suggest that a detailed assessment of their ecological value, including for protected and priority species (Species of Principal Importance) such as bats, birds, and reptiles, is essential in determining a specific route and schedule of works.
- 8.4.143 They further welcomed the fact that the potential for direct and cumulative impacts on such habitats is considered within the Preliminary Environmental Information Report, and are looking to ensure that, where possible, impacts are avoided, mitigated, and compensated for in line with the mitigation hierarchy. Where compensatory measures are required for unavoidable residual ecological impacts (including temporary impacts) after mitigation has reduced these as far as possible, they stated that their design and location should be informed by expert advice and such strategies and plans as exist to help prioritise and target nature conservation and recovery activities.
- 8.4.144 One respondent supported the creation of new woodland and hedgerows highlighted within the Preliminary Environmental Information Report, they also suggested the exceptional value and opportunities to restore and enhance other habitats present in this area of Suffolk, including open habitats such as heathland and acid grassland associated with the Suffolk Sandlings SPA.
- 8.4.145 With regard to the impact on birds, one respondent commented that, as explained in the Preliminary Environmental Information Report, the proposed cable corridor to the west of RSPB North Warren passes through areas of importance for Woodlark and Nightjar. They commented that these species are both features of the Sandlings SPA and Woodlark is listed under Schedule 1 of The Wildlife and Countryside Act. They commented over the potential impact on breeding Woodlark in close proximity to the onshore works and also highlighted that the route of the cable corridor passes through areas that may support Turtle Doves, a species on the Birds of Concern Red List due to its dramatic decline. Another species of comment was the Stone-curlew; parts of the cable corridor with sandy, acidic soils make the area potentially suitable for this species which is on the Amber List and under Schedule 1 of the Wildlife and Countryside Act.

## Summary of Regard

- 8.4.146 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.27 Needs case;
  - Section 25, Table 1.25 Alternative solutions;
  - Section 25, Table 1.22 Combined effect of Proposed Project; and
  - Section 25, Table 1.2 Terrestrial ecology.

## Needs case and alternative solutions

- 8.4.147 The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. National Grid's publicly documented needs case explains the requirements to reinforce the network

between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.

- 8.4.148 The needs case for the Proposed Project has identified that a connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:
- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);**
  - **Application Document 8.3 Strategic Options Report (October 2023);**
  - **Application Document 7.2 Strategic Options Back Check Report;**
  - **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
  - **Application Document 7.10 Coordination Document; and**
  - **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
- 8.4.149 While the comments stating a preference for use of previously developed land are acknowledged, it remains imperative that alternative options address the overarching needs case for the Proposed Project by providing additional network capacity where it is needed.
- 8.4.150 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites such as Sizewell and Bradwell. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant 12 effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.151 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.152 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the

German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.

- 8.4.153 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.154 National Grid has engaged with other project developers seeking to identify opportunities for co-ordination whilst maintaining obligations to facilitate network connection agreements by providing the required network reinforcement.
- 8.4.155 National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities. Details are contained in **Application Document 7.10 Coordination Document**.

### Combined effect of the Proposed Project

- 8.4.156 A full intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects**.

### Terrestrial ecology

- 8.4.157 National Grid acknowledges the potential impacts of the Proposed Project on terrestrial ecology and has undertaken a rigorous impact assessment in line with guidance and legislation which has taken into consideration statutory designations.
- 8.4.158 An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.
- 8.4.159 The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works.
- 8.4.160 Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions which is highlighted in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.161 Following Statutory consultation, National Grid undertook a survey of all trees within the Order Limits of the Onshore Scheme. **Application Document 6.10 Arboricultural Impact Assessment** details how trees located within and immediately adjacent to the Order Limits will be protected and what mitigation measures are embedded in the

design to offset the loss of trees. The tree survey has led to small changes in the routing of the cable and changes to the location of the bridge over the River Fromus to avoid significant trees. Protection zones will be established around remaining areas of woodland and/or trees to be retained.

- 8.4.162 The Proposed Project is also committed to achieving 10% Biodiversity Net Gain even though this is not a legal requirement at present.
- 8.4.163 Further details relating to the ecology assessment are contained in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**. Further details regarding biodiversity net gain are contained in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.164 National Grid recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity, Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology and Application Document 6.6 Habitats Regulations Assessment Report**, which consider the impacts of the scheme on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway.

## This is Question 8 (Suffolk) – ‘What do you think about our proposed landfall between Aldeburgh and Thorpeness?’

### Response to Q.8

- 8.4.165 The majority of respondents that answered question 8 did not think that the site proposed for the landfall was the best place at 67%. Those that had no preference totalled 25% and those who thought the proposed site was the best location was 9% of the total that responded.

Total responses: 1,130

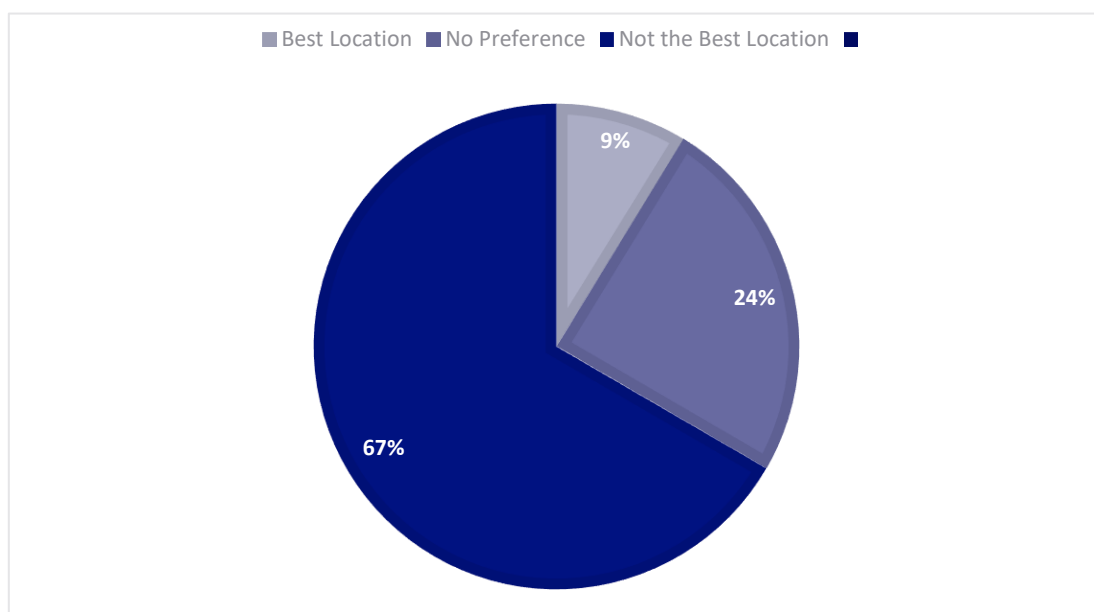


**Plate 8.8 Response to Q.8 ‘What do you think about our proposed landfall between Aldeburgh and Thorpeness?’**

### General commentary on the proposed landfall between Aldeburgh and Thorpeness

8.4.166 National Grid received 1,130 individual relevant responses to this question. In order to identify respondents’ opinions on the proposed landfall between Aldeburgh and Thorpeness as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- terrestrial ecology;
- alternative solutions;
- socio-economic, recreation and tourism;
- onshore environmental impact;
- landscape and visual; and
- ornithology.

### Terrestrial ecology

8.4.167 Some of the respondents supportive of the proposed location suggested that the Proposed Project must be constructed using technology that has the least impact on terrestrial ecology such as drilling under the wildlife sites. It was commented that burying infrastructure would be impactful in the short term but have benefits in the long term.

8.4.168 Many respondents commented about the impact of the landfall location on terrestrial ecology especially on the designated wildlife sites. Respondents commented that the Suffolk coast between Aldeburgh and Southwold is home to numerous nationally and internationally protected landscapes and wildlife sites, and diverse habitats including



coastal wetlands and reedbeds, heathland, acid grassland, and forest. Much of the coast is also part of the Suffolk Coast and Heaths AONB. The RSPB site at North Warren was mentioned by several respondents as being of particular concern. The wildlife that could be affected was stated as including rare birds such as bittern, marsh harrier, stone-curlew, nightjar, and woodlark, along with many amphibians (like natterjack toad), bats, and reptiles. Other wildlife sites mentioned were Darsham Marshes, Leiston-Aldeburgh SSSI and the Sandlings SPA.

- 8.4.169 With regard to other sites and species, The Haven, lying between North Warren and the sea, was commented as a SSSI being a rare shingle beach and an area known for its rare flora - Sea Pea, Sea Poppy and Sea Kale. Some respondents commented that Red deer are frequently heard around North Warren and their travel corridors can be seen across the old railway line.
- 8.4.170 Some respondents suggested that National Grid should rethink plans and review the alternatives, including their impacts on wildlife and ecology, so that the least damaging option can be developed and avoid harming nationally and international important places for nature.

### Alternative solutions

- 8.4.171 As with the answers to many of the questions regarding the Suffolk proposals, many respondents commented that an offshore solution should be developed with the use of brownfield sites for any required onshore infrastructure. Potential sites for relocation suggested by respondents were Sizewell, Bradwell or taking the power directly to Kent.

### Socio-economic, recreation and tourism

- 8.4.172 Several respondents commented regarding the impact on tourism as a result of the proposed landfall location due to its popularity as a tourist spot locally, nationally and internationally. It was commented that Aldeburgh and Thorpeness are both popular locations for relaxation and recreation for a wide range of visitors, citing that many people walk or cycle between the two by way of exercise and to enjoy the natural environment. Comments were raised over the knock-on effects on local businesses due to the disruption in tourism, and to the health and wellbeing of local business owners.
- 8.4.173 One respondent gave their support for the landfall location as long as the public footpaths and the ground are returned to as they were before the landfall and cable were constructed, adding that not many houses seem to be affected.

### Onshore environmental impact

- 8.4.174 Respondents' comments on the potential environmental impact of the proposed landfall location were very much linked with comments on the impact on terrestrial ecology and tourism. Many respondents suggested that the landfall location was not the right place for development due to the fact that they perceived the Proposed Project to have a significant impact. Aside from terrestrial ecology and tourism, other comments cited included the closure of footpaths, bridleways and cycle paths, impact on the fragile coastline which is subject to erosion and impacts from noise and vibration during construction.

### Landscape and visual

- 8.4.175 Responses commenting on the landscape and visual impact of the landfall location largely focused on the impact on the Suffolk Coast AONB which was said to be used by locals and tourists alike. Several respondents suggested development was unacceptable in such an area.

## Ornithology

- 8.4.176 Many respondents commented on the landfall location within the RSPB reserve of North Warren. One group commented that during the summer, bird sightings at the reserve include a large variety of song birds, waders and falcons. They also commented that iconic birds such as Bittern, Marsh Harrier, Black Tailed Godwit, Spoonbill and Bearded Tits can be seen and in winter it provides a home for hundreds of ducks and geese. In recent years Suffolk Bird groups have recorded sightings at RSPB North Warren of hundreds of Eurasian White-fronted Geese, Pintail, Teal, Shoveler, Pochard, Gadwall and Mallard overwintering on this important feeding ground. Other sightings along the coast from Southwold to Aldeburgh have been Waxwing, Caspian Gull, Jake Snipe, Pink Footed Geese, Purple Sandpiper, Little Auk, Black Redstart, Red-necked Grebe, Great Egret, Goosander to name just a few.
- 8.4.177 Other respondents commented on how the proposed construction methodology would affect the landfall site and whether there would be any impacts on the management of the landfall site during the Proposed Project operation. Furthermore, comments were raised over the disruption to habitat connections along the cable route from the landfall location.

## Summary of Regard

- 8.4.178 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.2 Terrestrial ecology;
  - Section 25, Table 1.25 Alternative solutions;
  - Section 25, Table 1.24 Socio-economic, recreation and tourism;
  - Section 25, Table 1.23 Environment – general;
  - Section 25, Table 1.1 Landscape and visual;
  - Section 25, Table 1.17 Ornithology; and
  - Section 25, Table 1.18 Combined effect of Proposed Project.

## Terrestrial ecology

- 8.4.179 The potential impacts of the Proposed Project on the AONB, the North Warren Nature Reserve and other designated sites are acknowledged by National Grid. It has undertaken a rigorous impact assessment in line with guidance and legislation which has taken into consideration statutory designations.
- 8.4.180 An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. Extensive consultation with key stakeholders such as Natural

England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.

- 8.4.181 The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works.
- 8.4.182 Significant disturbance is to be ensured against by a combination of construction methods (adopting a trenchless construction solution rather than open cut trenching), technical mitigation (noise fencing), moving the construction compound further from the SPA than it was identified at Statutory consultation, and phasing the most potentially disturbing elements of work in that area to avoid the bird nesting season.
- 8.4.183 The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.184 The Proposed Project is also committed to achieving 10% Biodiversity Net Gain even though this is not a legal requirement at present. Further details regarding biodiversity net gain are contained in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.185 The assessment of effects on the AONB is set out within **Application Document Part 2 Suffolk Chapter 1 Landscape and Visual**, and the effects on designated sites in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.

## Alternative solutions

- 8.4.186 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites such as Sizewell and Bradwell. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.187 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.188 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around

the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.

- 8.4.189 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.190 National Grid's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.
- 8.4.191 Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:
- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);**
  - **Application Document 8.3 Strategic Options Report (October 2023);**
  - **Application Document 7.2 Strategic Options Back Check Report;**
  - **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
  - **Application Document 7.10 Coordination Document; and**
  - **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

## Socio-economic, recreation and tourism

- 8.4.192 A complete assessment of socio-economic effects has been undertaken including the impact on public rights of way. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and concludes that there are no anticipated significant effects as a result of the Proposed Project. Impacts on health and wellbeing are set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**.
- 8.4.193 Public rights of way will be kept open wherever possible during the construction phase through the management measures identified. Where National Grid has a temporary impact on a PRoW during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** has been prepared which provides details of public right of way closures and diversions. This Plan is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## Onshore environmental impact

- 8.4.194 Environmental impacts were a key part of the consideration of the location for the proposed landfall site. Further details can be found in **Applicant Document 8.2 Options Selection and Design Evolution Report (October 2023)**. The potential impacts of the Suffolk landfall have been assessed in **Application Document Volume 6 Environmental Statement**. The following DCO documents are relevant to the feedback provided:
- **Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity;**
  - **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism;**
  - **Application Document 6.2.4.1 Part 4 Chapter 1 Physical Environment;** and
  - **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration.**
- 8.4.195 Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.

## Landscape and visual

- 8.4.196 The effects arising from the Suffolk Onshore Scheme on the AONB are summarised within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**. The assessment takes into account the Natural Beauty indicators and the relevant associated Suffolk Coast and Heaths AONB indicators relating to natural beauty indicators to landscape and visual matters. The effects on the Suffolk Heritage Coast are also set out within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.
- 8.4.197 Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.198 It is of note that an initial ground investigation survey has been undertaken to provide information to confirm the viability of a trenchless solution for the Suffolk landfall. This construction solution will minimise potential impacts on the AONB. Details are contained in **Application Document 7.3 Design Development Report**.



## Ornithology

- 8.4.199 A suite of bird surveys has been undertaken as part of the Proposed Project including over-wintering and breeding birds. These surveys have informed the assessment of potential impacts in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** and **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**. Appropriate mitigation measures, informed by bird surveys conducted, have also been provided.
- 8.4.200 During construction contractors will be required to adhere to the Construction Environmental Management Plan which sets out measures to avoid, minimise or mitigate any adverse effects on the environment during construction. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## Combined effect of the Proposed Project

- 8.4.201 A full intra-project effects assessment has been carried out for the Proposed Project in Suffolk. For the Suffolk Onshore Scheme, the full assessment is available within **Application Document Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects**.

**Question 9 (Suffolk) – ‘Our proposals include the option of co-locating infrastructure with that of up to two other projects, if they are required. Do you support this approach?’**

### **Response to Q.9 part 1 ‘Constructing additional ducts within the underground cable corridor to accommodate cables for up to two other projects’**

- 8.4.202 A quarter of the respondents that answered question 9 were in favour of constructing additional ducts within the cable corridor to accommodate cables for up to two other projects; approximately one fifth had no preference and the remaining did not support colocation with some stating that they did not support the project in its proposed location.

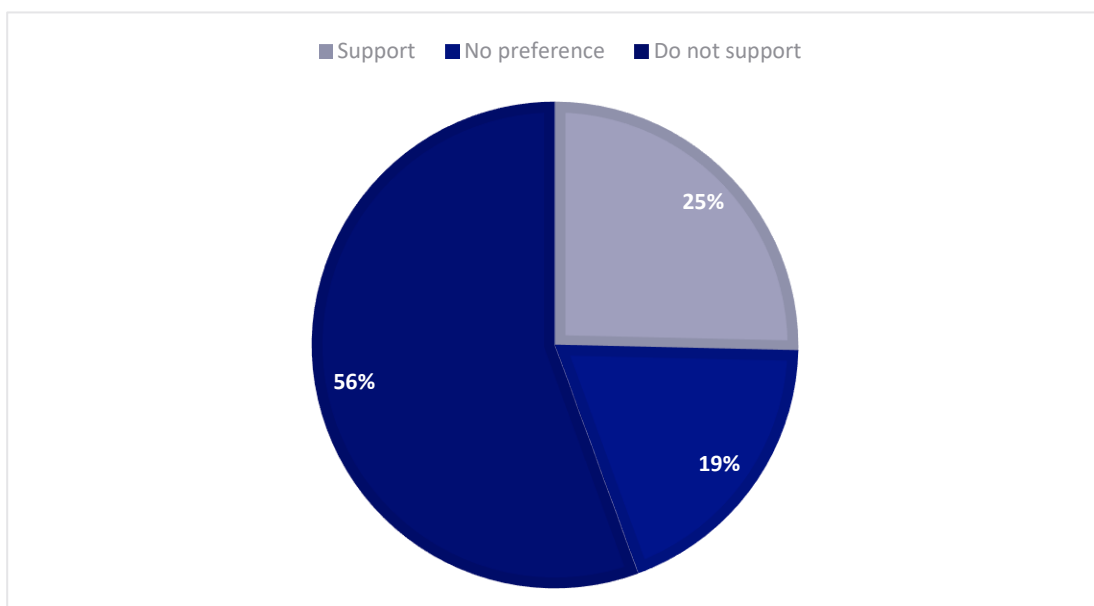




Plate 8.9 Response to Q.9 part 1 ‘Constructing additional ducts within the underground cable corridor to accommodate cables for up to two other projects’

### Response to Q.9 part 2 ‘Co-locating up to three converter stations at a single location near Saxmundham

8.4.203 Almost 20% of respondents supported the co-location of up to three converter stations at a single location at Saxmundham, with some respondents stating that co-location is a better option to reduce environmental impacts. Just over 20% had no preference with 60% not in favour of the co-location.

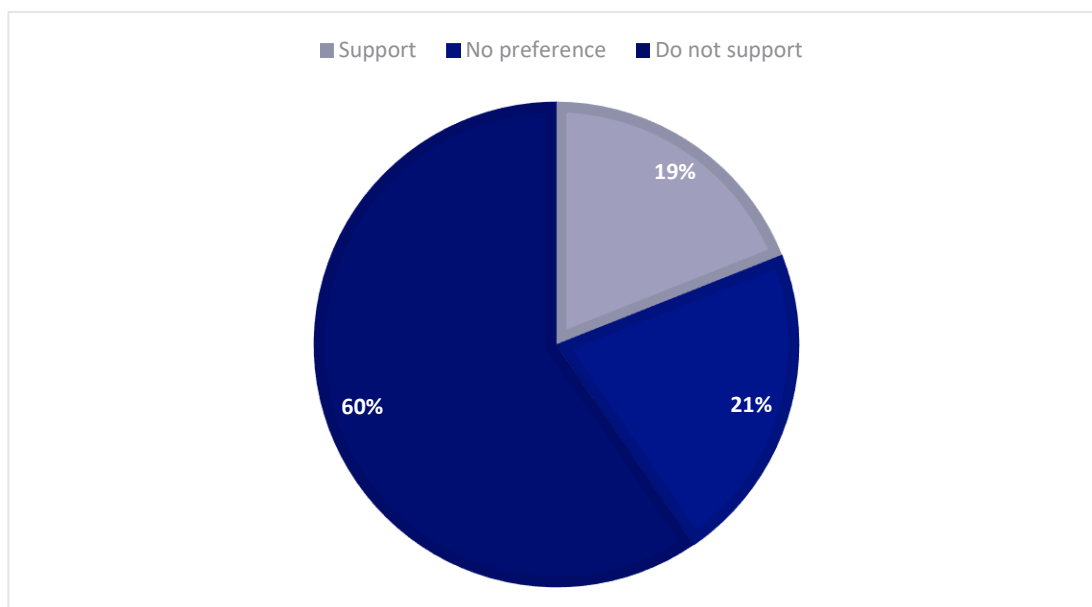


Plate 8.10 Response to Q.9 part 2 ‘Co-locating up to three converter stations at a single location near Saxmundham’

### Response to Q.9 part 3 ‘Co-locating the landfall point of up to three projects at a location between Aldeburgh and Thorpeness’

8.4.204 Similarly with the option of co-locating on the converter location site, almost 20% of respondents supported the co-location of the landfall point of up to three projects. A fifth (20%) had no preference with just over 60% not in favour.

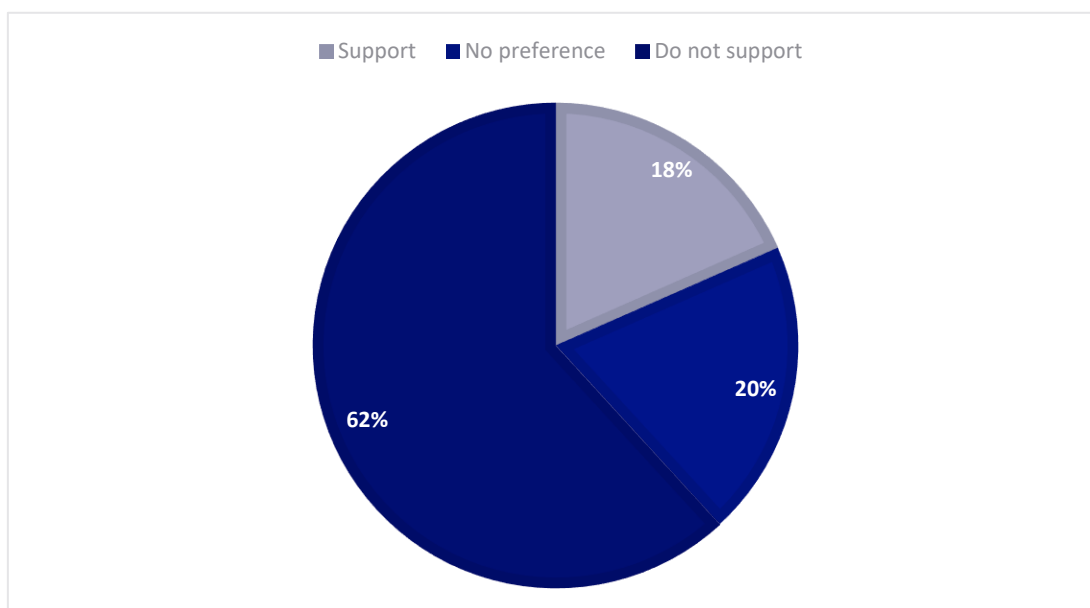


Plate 8.11 Response to Q.9 part 3 'Co-locating the landfall point of up to three projects at a location between Aldeburgh and Thorpeness

### General commentary on the option of co-locating infrastructure with up to two other projects

8.4.205 In order to identify respondents' opinions on the option of co-locating infrastructure with up to two other projects as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The theme that attracted the most comments was in relation to alternative solutions.

### Alternative solutions

8.4.206 Of the respondents supporting co-location, the majority stated that they supported co-location but not in the areas proposed by National Grid, e.g. Saxmundham and Friston. Several commented that they support co-location at sea or on a brownfield site such as Bradwell or Sizewell and that all the projects in the area should share common infrastructure, but in the right place.

8.4.207 One respondent commented that the onshore infrastructure should be located in an existing industrial zone where adequate port/road/rail access is available and a workforce could be easily accommodated.

8.4.208 Some respondents commented that co-location is a better option to reduce environmental impacts and did not specify the need for an alternative site. Some felt that co-location would have a greater impact on the co-location site and that development should be on brownfield sites or offshore.

## Summary of Regard

8.4.209 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following section and table of **Application Document 5.1.6 Appendix E Statutory Consultation**:

- Section 25, Table 1.25 Alternative solutions.

## Alternative solutions

- 8.4.210 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.211 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.212 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.213 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.
- 8.4.214 National Grid has engaged with other project developers in the area, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. Details are contained in **Application Document 7.1 Coordination Document**.

## Question 10 (Suffolk) – ‘Is there anything further you would like us to take into consideration when developing our proposals in Suffolk?’

### General commentary on anything further you would like us to take into consideration when developing our proposals in Suffolk?

8.4.215 National Grid received 594 individual relevant responses to this question. In order to identify respondents’ opinions on any further comments to be taken into consideration when developing the proposals in Suffolk as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions;
- consultation;
- coordination with other projects; and
- needs case.

### Alternative solutions

8.4.216 The majority of respondents commented that the Proposed Project should be developed offshore with any onshore infrastructure being constructed at brownfield sites. Some suggested that building onshore infrastructure on a brownfield site closer to where the power is needed (e.g. Kent) would be a much better solution for the Suffolk tourism economies, local communities and the environment, citing the fragile Suffolk coastline as an issue. Many commented that National Grid should look to European countries like Belgium, Holland, Germany and Denmark who are already introducing these kinds of integrated offshore grids using offshore platforms for operation by 2030. Some suggested offshore development would be a cheaper option, and one respondent stated that technological advances in transporting, storing and converting electricity are taking place all of the time and thus an offshore platform would be better suited to Sea Link and other projects.

### Consultation

8.4.217 Several suggestions were made by respondents on the theme of consultation. Several respondents commented that National Grid needs to present the complete picture of energy projects in this area, not just isolated projects, and went on to say that the area is subject to multiple large scale energy projects all over the same time period which surely means decades of works - all detrimentally impacting the residents and businesses. One commented that not presenting the full picture of the impact of all the projects has carried alarm and confusion in local communities. Other suggestions were:

- be more proactive on the benefits of the Proposed Project and reassure local residents on what upheavals and inconveniences will be attained to the Proposed Project;
- clearly explain other alternatives and meaningfully engage with communities rather than carry out a tick box exercise;
- National Grid should take on board the comments of the local residents, parish councils and local authorities;

- have meaningful discussions with Kent and Suffolk Wildlife Trusts; and
- take time to listen to the concerns and fears of local people.

## Coordination with other projects

- 8.4.218 Linked with alternative solutions, some respondents suggested that National Grid should rethink the proposals and coordinate with other infrastructure initiatives. It was suggested that National Grid should be open and transparent with all the other developers who are seeking to build in this area and establish, model and describe the total industrial development, including land take, construction duration, traffic and transport and socio-economic impacts on existing residents. One respondent commented that they appreciated the need to improve and increase supplies, but they felt that more should be done to combine all the Suffolk projects and bring them into one hub.
- 8.4.219 In a similar vein, one respondent commented that all the energy projects, including the Proposed Project, LionLink, etc. should have been considered as one project and not drip-fed into the planning system. They felt that this approach is unfair and puts a huge burden on the local community. This area (Suffolk) is faced with the imminent construction of a third nuclear power station at Sizewell and the transport network and local services are totally insufficient for further industrial development.

## Needs case

- 8.4.220 Some respondents commented that the project is needed to upgrade the system citing power cuts in the area with the need to secure a future power supply but feel the County of Suffolk does not need any further development in this way. Many people suggested the Proposed Project did not need to be based in Suffolk.

## Summary of Regard

- 8.4.221 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.25 Alternative solutions;
  - Section 25, Table 1.35 Consultation;
  - Section 25, Table 1.28 Coordination with other projects; and
  - Section 25, Table 1.27 Needs case.

## Needs case and alternative solutions

- 8.4.222 The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. National Grid's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.

- 8.4.223 The needs case for the Proposed Project has identified that a connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:
- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);**
  - **Application Document 8.3 Strategic Options Report (October 2023);**
  - **Application Document 7.2 Strategic Options Back Check Report;**
  - **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;**
  - **Application Document 7.10 Coordination Document; and**
  - **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
- 8.4.224 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
- 8.4.225 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.
- 8.4.226 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.
- 8.4.227 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.



## Consultation

- 8.4.228 National Grid acknowledges that the Proposed Project, together with other planned projects in the area, may have cumulative impacts and as such has undertaken a complete assessment of potential cumulative impacts in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects**.
- 8.4.229 National Grid has engaged with other project developers seeking to identify opportunities for co-ordination whilst maintaining obligations to facilitate network connection agreements by providing the required network reinforcement.
- 8.4.230 National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities. Details are contained in **Application Document 7.10 Coordination Document**. The potential impacts and benefits of the Proposed Project are set out in **Application Document Volume 6 Environmental Statement**. The main alternatives to the Proposed Project are outlined in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**. National Grid has engaged with both Suffolk and Kent Wildlife Trusts throughout the development of its proposals. National Grid has treated both Trusts as non-prescribed consultees and therefore consulted them as part of both the Non-statutory, Statutory and Targeted consultations.
- 8.4.231 The SoS directed that the Proposed Project be consented via the DCO process under the Planning Act 2008. National Grid is therefore required to follow all of the relevant procedures and processes under the Planning Act 2008. National Grid has conducted extensive consultation exercise with the community giving them opportunities to comment in a variety of ways in accordance with the requirements of the Planning Act 2008.

## Coordination with other projects

- 8.4.232 National Grid's plans in Suffolk have been developed for the Proposed Project as a standalone project but have been designed in a coordinated way with other projects, including two potential NGV projects. As development work on the Proposed Project and these other projects has progressed, its approach to coordination has evolved. A key part of the coordination strategy is to continue to explore opportunities to co-locate infrastructure where feasible and beneficial. At Statutory consultation, National Grid presented a Proposed Project design which showed the NGV works themselves at the landfall and along the cable sections. It also included the entire wider site at Saxmundham, to show how it could be flexible if constructing around one or two additional converter stations. This assumed a scenario where the NGV projects, whose routing and siting work is at an earlier stage, identified the same cable and converter station sites as the Proposed Project. In March 2024, NGV's LionLink project announced that it had down selected its potential landfall at Aldeburgh and would be removing it from the LionLink proposals. LionLink is still proposing to co-locate its converter station alongside the Proposed Project's near Saxmundham. As the design work and the engagement with the NGV projects has progressed, National Grid has evolved its approach to coordinating with NGV. It is considering further ways that it could coordinate its construction activities and other projects and developers, including NGV, EDF Energy and SPR.

## Question 11 (Marine) – ‘Do you have any comments or issues you would like us to take into consideration regarding our marine proposals?’

### General commentary on anything further you would like us to take into consideration regarding our marine proposals?

- 8.4.233 National Grid received 724 individual relevant responses to this question. In order to identify respondents’ opinions on any comments or issues to be taken into consideration regarding the marine proposals as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2.
- 8.4.234 Many respondents were supportive of the marine proposals believing offshore cabling to be less destructive over development on land particularly in areas of terrestrial ecological and agricultural importance, and less impact on local residents.
- 8.4.235 As with previous questions, many respondents made comments on the need to explore alternative solutions and questioned the need for the Proposed Project. Other themes that attracted comments were:
- Physical environment; and
  - marine and terrestrial ecology.

### Physical environment

- 8.4.236 Many respondents commented regarding Suffolk’s Coralline Crag which was stated to protect Aldeburgh and the Suffolk coast from erosion and a key geological feature in the area. Many commented that the Coralline Crag protects against coastal erosion and were concerned about the impact the Proposed Project might have on this area especially with regard to the impact of the tidal flow at Aldeburgh. One respondent suggested that National Grid looks back in history at how the sea has affected towns and villages along the Suffolk Coast explaining that Dunwich, a former capital of Suffolk, was taken by the sea and has only a few properties left following a storm out at sea and that it altered a sandbank. Similarly, the respondent stated that Orford used to be an important shipping port until a storm moved vast amounts of shingle and the port was no longer accessible, leading to the demise of Orford.
- 8.4.237 Requests were made for National Grid to investigate this issue thoroughly so that a flood disaster in future years isn’t caused.

### Marine and terrestrial ecology

- 8.4.238 Linked to the marine cable, many respondents commented on the siting of the landfall within Pegwell Bay in Kent due to its status as a SSSI and an important area for migrating birds.
- 8.4.239 Respondents commented about running the cable through the protected area of Margate and Long Sands Special Area of Conservation. It was suggested that this area supports Annex I habitats, which are protected under European Law, and it should therefore not be disturbed with the cable. Furthermore, there were also comments about the extent to which this level of development may cause irreversible habitat loss to

Goodwin Sands which is in a Marine Conservation Zone and supports diverse epifauna such as Sabellaria Reefs, a priority habitat and blue mussel beds.

- 8.4.240 One respondent commented on the impact on the habitats and breeding grounds of fish and invertebrates, suggesting that a full ecological survey is needed, with the route adjusted accordingly.
- 8.4.241 Several respondents commented regarding the impact of the Proposed Project within Pegwell Bay on seals, stating that the Sandwich to Pegwell Bay National Nature Reserve is a seal haul-out location, supporting Kent's largest seal population which use the Reserve all year round to rest, molt and breed.
- 8.4.242 The respondents also commented on the sandbanks, saying they are important spawning and nursery grounds for species such as thornback rays.
- 8.4.243 One respondent commented that the golden plover, turnstone, and red-throated diver have all been recorded at Pegwell Bay and the surrounding sites and are at risk of being displaced through disturbance. The golden plover and turnstone are designated features for Thanet Coast and Sandwich Bay SPA. Other respondents suggested other sites being impacted such as Sandwich Bay and Hackling Marshes SSSI, Ash Level and South Richborough Pasture Local Wildlife Site and Woods and Grassland Minster Marshes Local Wildlife Site.
- 8.4.244 One respondent commented that they are particularly concerned about the disturbance and displacement impacts of construction, installation, maintenance and decommissioning of the subsea HVDC on red-throated diver in the Outer Thames Estuary SPA. They further commented that their concern is reinforced by the Secretary of State's recognition in the East Anglia ONE North and East Anglia TWO Decision Letters of a likely "adverse effect on integrity ... in relation to alone and in-combination impacts on red-throated diver from displacement/disturbance, a qualifying feature of the Outer Thames Estuary SPA". As PINS also noted in **Application Document 6.14 Environmental Scoping Report 2022** (para. 5.3.3), the Outer Thames Estuary SPA "qualifying features include species such as red-throated diver which are known to be vulnerable to disturbance and which could be affected by construction and maintenance activities".

## Summary of Regard

- 8.4.245 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.13 Physical environment;
  - Section 25, Table 1.2 Terrestrial ecology;
  - Section 25, Table 1.14 Benthic ecology;
  - Section 25, Table 1.15 Fish and shellfish ecology; and
  - Section 25, Table 1.16 Marine mammals.

## Physical environment

- 8.4.246 **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** considers the coastal processes operating at both the Suffolk and Kent landfalls, and

how they may alter through the lifetime of the Project taking into account the influence of climate change. The ES also assesses the impact of cable installation processes and the presence of the cable on nearshore/coastal hydrodynamics and sediment transport, and morphology.

## Marine and terrestrial ecology

- 8.4.247 National Grid recognises the importance of the English East Coast and its coastal wetlands as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity, Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology and Application Document 6.6 Habitats Regulations Assessment Report.**
- 8.4.248 The potential impacts on marine biodiversity have been assessed in the Proposed Project Environmental Statement. Details are contained in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals, Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology, Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology and Application Document 6.6 Habitats Regulations Assessment Report.**
- 8.4.249 A detailed routing and siting study was undertaken to ensure the complete avoidance of the Annex 1 habitat features within both Margate and Long Sands SAC. Based on feedback received at Statutory consultation, the marine cable has been re-routed to avoid the Goodwin Sands Marine Conservation Zone. This will avoid direct impacts and reduce impacts to the known and potential benthic receptors located within the area including *Sabellaria spinullosa* and *Mytilus edulis*. Further details are contained in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology and Application Document 7.3 Design Development Report.**
- 8.4.250 For red-throated diver, the Proposed Project is committing to a full seasonal restriction (01 November to 31 March) for offshore cable installation activities in the Outer Thames Estuary SPA and a reduced seasonal restriction (01 January to 31 March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. National Grid has prepared a specific protocol for the Red Throated Diver (**Application Document 7.8 Red-Throated Diver Protocol**). Compliance with the Protocol is secured within Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order.**
- 8.4.251 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity and Application Document 7.5.3.2 CEMP Appendix B Register of Environmental**

## Question 12 (Kent) – ‘What do you think about our proposed landfall at Pegwell Bay?’

### Response to Q.12

8.4.252 The majority of respondents that answered question 12 did not think that the site proposed for the landfall was the best place at 60%. Those that had no preference totalled 24% and those who thought the proposed site was the best location was 16% of the total that responded.

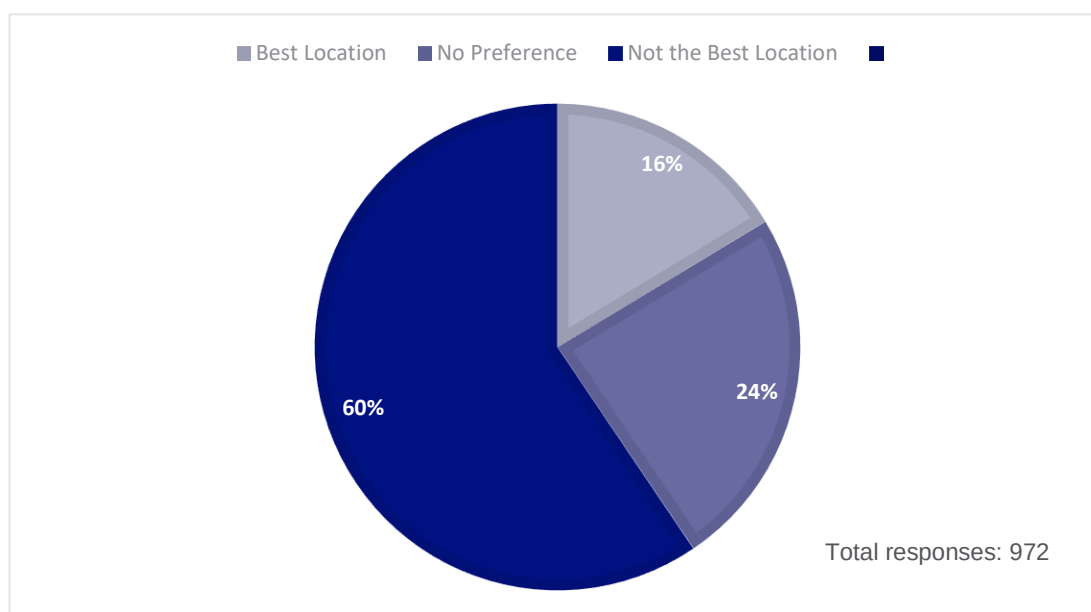


Plate 8.12 Response to ‘What do you think about our proposed landfall at Pegwell Bay?’

### General commentary on the proposed landfall at Pegwell Bay

8.4.253 National Grid received 972 individual relevant responses to this question. In order to identify respondents’ opinions on the proposed landfall at Pegwell Bay as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- terrestrial ecology;
- alternative solutions; and
- ornithology.

### Terrestrial ecology

8.4.254 Out of the respondents who thought the landfall was not in the best location, many commented on the impacts on the ecology of Pegwell Bay stating the site is of national and international importance. Some suggested that the potential impacts could not be adequately mitigated.

- 8.4.255 Some respondents commented that the landfall would be located within the Thanet Coast and Sandwich Bay SPA, Ramsar site, Sandwich Bay and Hackling Marshes SSSI, Sandwich and Pegwell Bay National Nature Reserve and that they thought there would be a severe impact on wildlife in the area, particularly during the four-year construction period.
- 8.4.256 One respondent commented about the impact of the landfall on the Thanet Coast and Sandwich Bay SPA/Ramsar.

### Alternative solutions

- 8.4.257 Some respondents commented that Pegwell Bay is an unsuitable location for the landfall due to the presence of designated areas. It was suggested that alternative locations need to be identified that do not have the degree of wildlife sensitivity that this area does.
- 8.4.258 Offshore development and development on brownfield sites was suggested; specific sites suggested comprised Kingsnorth, Manston, Isle of Grain and Dungeness.

### Ornithology

- 8.4.259 Several respondents commented on the importance of Pegwell Bay for bird species. Some commented it is home to hundreds of bird species many of which are on the endangered list. Species seen at Pegwell include barn owls, partridges, skylarks, grasshopper warbler, garden warbler, curlew, golden plover, lapwing, hen harrier, marsh harrier, yellow hammer, sparrow hawk, jack snipe, common snipe and turtle doves. Some respondents commented that the Bay, the SSSI and the marshes combine to create a superhighway of bird movement both for wetland birds and migratory birds. Additionally, that the area provides a biodiverse habitat for migrating birds to feed, rest and roost after flying thousands of miles.

### Summary of Regard

- 8.4.260 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.2 Terrestrial ecology;
  - Section 25, Table 1.25 Alternative solutions; and
  - Section 25, Table 1.17 Ornithology.

### Terrestrial ecology

- 8.4.261 National Grid acknowledges the ecological sensitivity of Pegwell Bay and the surrounding sites of nature conservation importance. A detailed impact assessment is provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**.
- 8.4.262 The impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council,



Kent Council and Kent Wildlife Trust has taken place, and the survey data and impact assessment has informed avoidance and mitigation.

- 8.4.263 Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. National Grid's commitment to the trenchless solution is secured in Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. An initial study has been undertaken to confirm the suitability of using a trenchless solution, details of which are contained in Appendix A of **Application Document 7.3 Design Development Report**.
- 8.4.264 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for non-breeding golden plover that move inland from Pegwell Bay to feed on farmland around the Kent Onshore Scheme has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. Collision risk assessment regarding birds using the River Stour corridor to travel from Pegwell Bay to Stodmarsh has also been undertaken. Although the assessment concludes no significant impact even in the absence of mitigation, mitigation has been included in the form of bird diverters on the new section of overhead line. Mitigation is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitats Regulations Assessment Report**.
- 8.4.265 The Proposed Project is committed to achieving 10% Biodiversity Net Gain despite there being no current legal requirement to do so (refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report**).

## Alternative solutions

- 8.4.266 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes the old power station at Kingsnorth, the Isle of Grain and Dungeness. The SoS for Transport has granted a DCO for works to reopen Manston Airport primarily as an international freight airport, so the site is not an option.

## Ornithology

- 8.4.267 National Grid recognises the importance of the English East Coast and its coastal wetlands as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in

**Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity, and Application Document 6.6 Habitats Regulations Assessment Report**, which consider the impacts of the scheme on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway.

- 8.4.268 Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. National Grid's commitment to the trenchless solution is secured in Requirement 6 of Schedule 3 **Application Document 3.1 Draft Development Consent Order**. An initial study has been undertaken to confirm the suitability of using a trenchless solution, details of which are contained in Appendix A of **Application Document 7.3 Design Development Report**.
- 8.4.269 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for non-breeding golden plover that move inland from Pegwell Bay to feed on farmland around the Kent Onshore Scheme has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. Collision risk assessment regarding birds using the River Stour corridor to travel from Pegwell Bay to Stodmarsh has also been undertaken. Although the assessment concludes no significant impact even in the absence of mitigation, mitigation has been included in the form of bird diverters on the new section of overhead line. Mitigation is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity and Application Document 6.6 Habitats Regulations Assessment Report**.

## Question 13 (Kent) – ‘What do you think about our proposed HVDC cable route in Kent?’

### Response to Q.13

- 8.4.270 Almost a fifth of respondents either agreed outright with the proposals or agreed with some elements but not others. Almost two-thirds had no preference, while just over half disagreed with the proposed route.

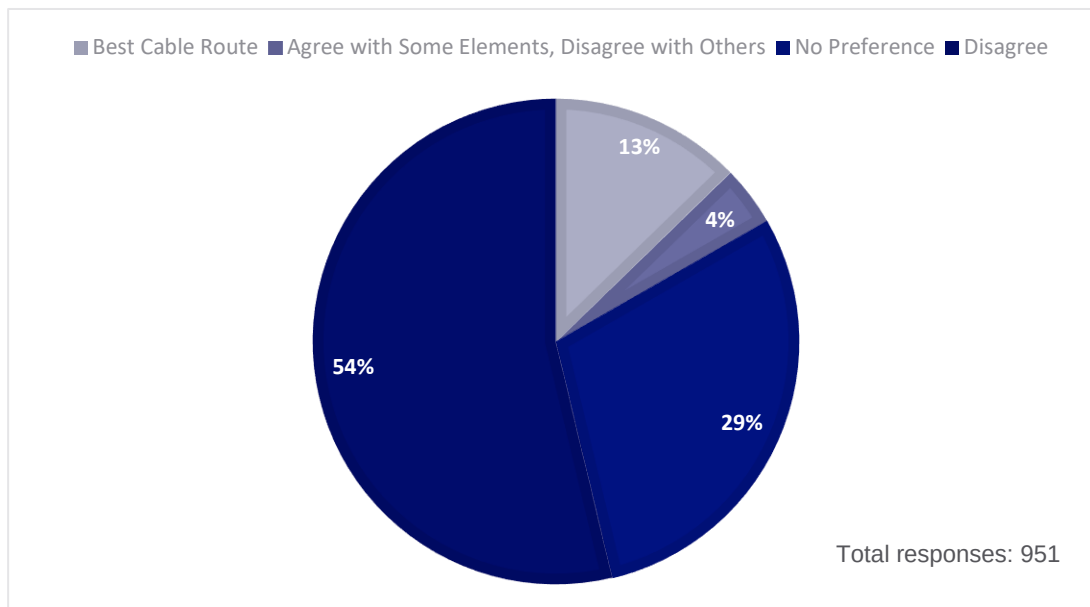


Plate 8.13 Response to 'What do you think about our proposed HVDC cable route in Kent?'

### General commentary on the proposed HVDC cable route in Kent

8.4.271 National Grid received 951 individual relevant responses to this question. In order to identify respondents' opinions on the proposed HVDC cable route in Kent as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- terrestrial ecology; and
- ornithology.

#### Terrestrial ecology

8.4.272 Not many of the respondents that supported the HVDC route made comments; however, some of those that did stated that the route looks the most direct and avoids residential areas. It was also suggested that trenchless installation should minimise the impact on the area.

8.4.273 Other respondents had comments about the impact of the cable on Minster Marshes and the River Stour valley citing that they are important areas for wildlife. Some suggested that Minster Marshes will be severely impacted, stating the area is a wildlife sanctuary with habitats with delicate ecosystems.

#### Ornithology

8.4.274 Many respondents commented that there was very little detail provided as to how the cables would be installed and also commented on the introduction of overhead lines which they stated have been shown to harm migrating birds. One respondent said that the route runs directly through the only heronry in East Kent and went on to say that grey herons and little egrets currently breed there as do turtle doves and nightingales, both of which are on the red and amber listed species list.

## Summary of Regard

- 8.4.275 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.2 Terrestrial ecology; and
  - Section 25, Table 1.17 Ornithology.

### Terrestrial ecology

- 8.4.276 National Grid acknowledges the comments relating to the benefits of the proposed route of the HVDC cable in Kent. Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. National Grid's commitment to the trenchless solution is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. An initial study has been undertaken to confirm the suitability of using a trenchless solution, details of which are contained in Appendix A of **Application Document 7.3 Design Development Report**.
- 8.4.277 National Grid recognises the ecological sensitivity of Minster Marshes. A detailed impact assessment is provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**.
- 8.4.278 The impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations and sensitive sites. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.

### Ornithology

- 8.4.279 As part of the Proposed Project Environmental Statement, National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to **Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey** and the surveys are reported in **Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report**. The Kent Onshore Route has been designed to reduce the number of towers required. Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. National Grid's commitment to the trenchless solution is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured in Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Details regarding the suitability of trenchless solutions are contained in Appendix A of **Application Document 7.3 Design Development Report**.
- 8.4.280 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for non-breeding golden plover that move inland from Pegwell Bay to feed on farmland around the Kent Onshore Scheme has been discussed at

length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. Collision risk assessment regarding birds using the River Stour corridor to travel from Pegwell Bay to Stodmarsh has also been undertaken. Although the assessment concludes no significant impact even in the absence of mitigation, mitigation has been included in the form of bird diverters on the new section of overhead line. Mitigation is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitats Regulations Assessment Report**.

## Question 14 (Kent) – ‘What do you think about our proposed converter station and adjacent substation near Minster?’

### Response to Q.14

8.4.281 When asked what people thought of the proposed converter station location in Kent, 13% of respondents who answered thought it was in the right location. Those who had no preference totalled 29% and those who thought the converter station was in the wrong location totalled 58%.

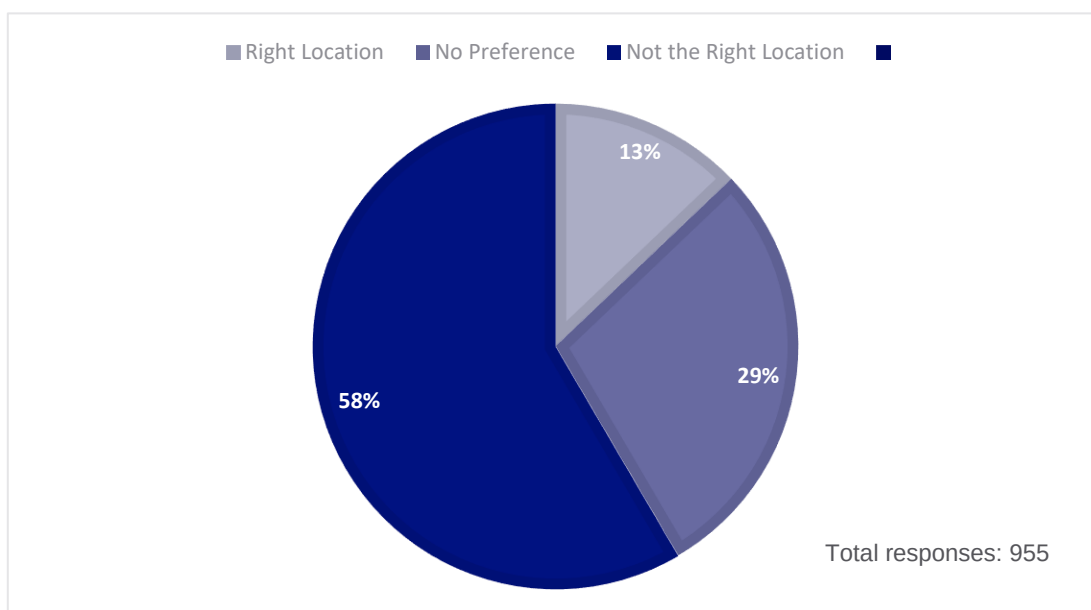


Plate 8.14 Response to Q.14 ‘What do you think about our proposed converter station and adjacent substation near Minster?’

### General commentary on the proposed converter station and adjacent substation near Minster

8.4.282 National Grid received 955 individual relevant responses to this question. In order to identify respondents' opinions on the proposed converter station and adjacent substation near Minster as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- terrestrial ecology; and
- water environment.

### Terrestrial ecology

8.4.283 One respondent commented about the loss of habitat for a flock of golden plover that were recorded within the field the converter and substation are proposed to be built. They stated that this number of golden plover equates to more than 1% of both the SPA population and the British Trust for Ornithology Wetland Bird Survey counts (this is the monitoring scheme for non-breeding waterbirds in the UK which aims to provide the principal data for the conservation of their populations and wetland habitats).

8.4.284 Many respondents objected to the development of the converter station on Minster Marshes due to its status as a haven for wildlife supporting a unique biodiversity. Wildlife mentioned included species birds, insects, plants, mammals and reptiles. Coupled with this, was the location of the converter station adjacent to nationally designated sites such as nature reserves and sites of special scientific interest. Of these, Pegwell Bay was mentioned as a unique location for wading and migrating birds, and Thanet Coast and Sandwich Bay SPA and Hackling Marshes SSSI.

### Water environment

8.4.285 Respondents commented that the converter station would be located in an area prone to flooding. One respondent, looking at Climate Central forecasts, suggested the site will be underwater by 2050 with the situation already looking bad, resulting in the building of additional flood defences near the proposed cable landing site at Pegwell Bay and in Sandwich Town to stop the River Stour breaking its banks, as it has already done on several occasions. They also commented that the consultation document made no mention of the existing or future potential flood risk which they found concerning. Some respondents felt that building in this area would create increased run-off and lead to flooding elsewhere.

### Summary of Regard

8.4.286 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:

- Section 25, Table 1.2 Terrestrial ecology; and
- Section 25, Table 1.4 Water environment.

### Terrestrial ecology

8.4.287 Bird surveys have been undertaken as part of the Proposed Project EIA. These surveys covered feeding and roosting birds including the golden plover. A full dataset is



available, which has informed the further assessment of potential impacts, refer to **Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology**.

- 8.4.288 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. The commitment to the provision of this is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.289 National Grid acknowledges the ecological sensitivity of Minster Marshes and Pegwell Bay. A detailed impact assessment is provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**.
- 8.4.290 The impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.

## Water environment

- 8.4.291 Flooding concerns are noted. **Application Document 6.8 Flood Risk Assessment** has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.292 Surface water runoff arising from the Proposed Project during both its construction and operation would be captured, suitably treated where necessary and attenuated prior to discharge into the surrounding water environment at rates no greater than existing (inclusive of suitable climate change allowances over the Proposed Project's lifetime). In addition, where the project interacts with existing land drainage, there is a Project commitment, secured through the DCO, to re-provide a suitable alternative means of land drainage such that the existing land drainage regime is not compromised.
- 8.4.293 A climate change risk assessment is included within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in Environmental Impact Assessments.

8.4.294 Commitment W14 of **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** states that the appointed contractor shall develop a Drainage Management Plan which must be submitted to the Local Planning Authority for approval prior to construction. The Plan will demonstrate how surface water runoff will be managed during construction and how surface water would be managed during operation including maintenance of the drainage infrastructure over the lifetime of the Proposed Project. The requirement is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**).

**Question 15 (Kent) – ‘We have identified several design approaches for the proposed converter station. Which approach(es) would you like to see explored at later design stages?’**

### **Response to Q.15**

8.4.295 As with question 6, for question 15, respondents were able to select more than one option. The majority of respondents selected ‘green roof’ as the preferred design approach to take forward, followed by ‘colour’ and ‘colour and curve’. Smaller numbers of respondents selected the options of ‘enhanced elevations’, ‘agricultural barns’ and ‘kinetic’.

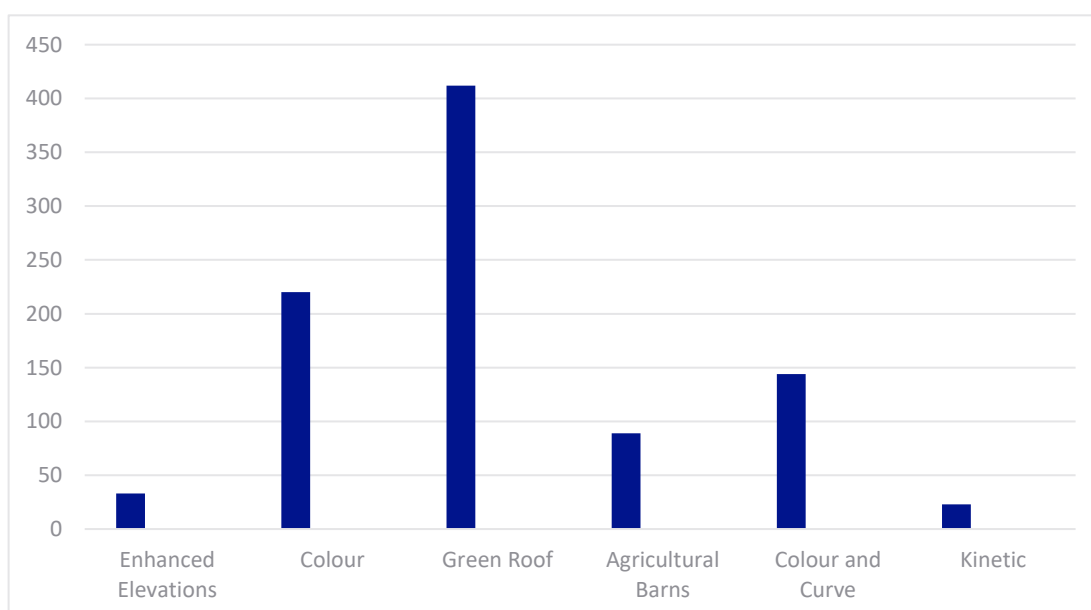


**Plate 8.15 Response to Q.15 ‘We have identified several design approaches for the proposed converter station. Which approach(es) would you like to see explored at later design stages?’**

### **General commentary on the design approaches for the proposed converter station**

8.4.296 In order to identify respondents’ opinions on the design of the proposed converter station as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The theme that attracted the most comments was landscape and visual.

## Landscape and visual

- 8.4.297 When selecting 'green roof' and 'agricultural barns' as design options, many respondents commented that this design choice would help the converter station to blend in with its surroundings and be less intrusive. Many also suggested that any structure should be designed to fit in with the local environment.
- 8.4.298 A few respondents commented that it would be difficult to blend the building in with the landscape and that there would always be a visual impact.

## Summary of Regard

- 8.4.299 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following section and table of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.1 Landscape and visual.

## Landscape and visual

- 8.4.300 National Grid welcomes comments relating to the design of the proposed converter station in Kent and feedback received will be taken into account when developing the detailed design and has been taken into account in the design principles so far.
- 8.4.301 The potential for visual impacts is acknowledged and the effects arising from the Kent Onshore Scheme on the local landscape character and visual amenity are summarised within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** and detailed within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment**.
- 8.4.302 **Application Document 7.12.1 Design Principles – Kent** and **Application Document 7.11.2 Design Approach Document – Kent** provide information on the objectives of the design process for the Proposed Project including the Kent Converter Station.

## Question 16 (Kent) – 'What do you think about our plans to use overhead lines to connect the proposed substation into the existing Richborough to Canterbury overhead line?'

## Response to Q.16

- 8.4.303 Out of the 926 respondents that answered this question, 13% were in favour and many stated that it was sensible to connect to the existing infrastructure and that they thought this option would be cheaper. Just over half of respondents disagreed with the plans to use an overhead line connection and 32% had no preference either way.

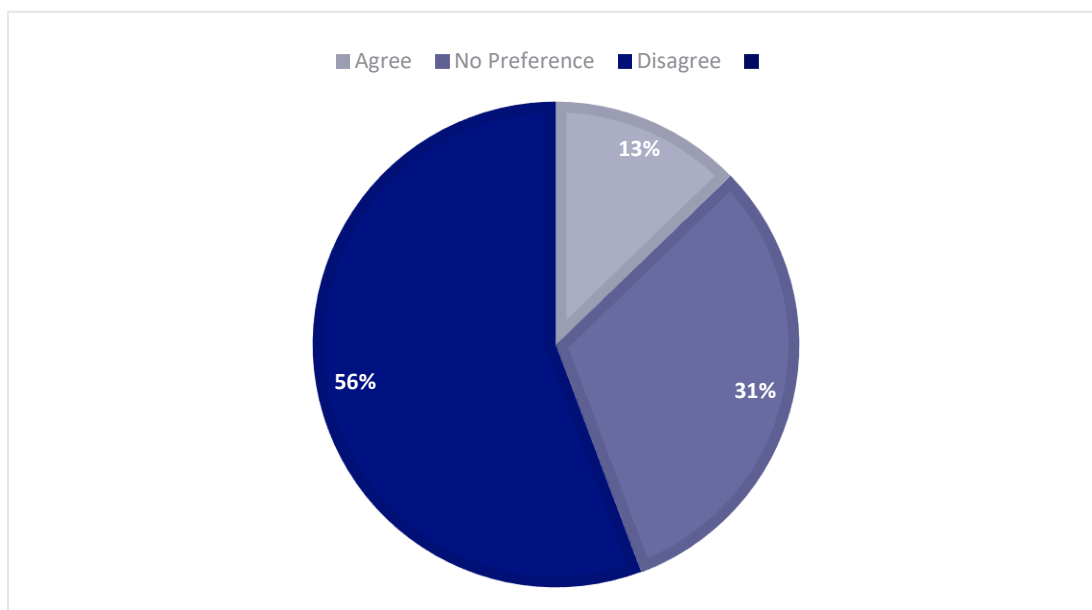


Plate 8.16 Response to 'What do you think about our plans to use overhead lines to connect the proposed substation into the existing Richborough to Canterbury overhead line?'

### General commentary on plans to use the overhead lines to connect the proposed substation into the existing Richborough to Canterbury overhead line

8.4.304 National Grid received 926 individual relevant responses to this question. In order to identify respondents' opinions on the use of overhead lines as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- ornithology; and
- landscape and visual.

### Ornithology

8.4.305 Many respondents commented about the impact of overhead lines on birds, many citing a recent incident where 179 mute swans were killed when they flew into overhead lines not far from the Proposed Project location at Monkton.

8.4.306 One respondent noted that while the Government's draft National Policy Statement EN-5 acknowledges that many birds are killed or injured by flying into overhead power lines, pylons carrying such lines near the coast pose a particular danger in spring and autumn, when many thousands of birds migrate to and from the coast. The respondent commented that they are also notably hazardous near rivers, between bodies of water, close to arable fields used by grazing wildfowl and of course where they lie across flight paths used by swans, geese, ducks, gulls and waders, among other birds.

8.4.307 They further commented that the potential for casualties and fatalities increases with birds that leave their daytime feeding grounds and fly to nocturnal roosting areas. The coming together of so many factors at the site of the proposed Sea Link converter station on Minster Marshes, where National Grid is suggesting running a double line of pylons over the River Stour to join the Richborough-Canterbury pylon route, is potentially catastrophic for birdlife.

- 8.4.308 Some respondents commented that birds fly up the River Stour either to access inland sites across the UK or ‘commute’ between the estuary and Stodmarsh Nature Reserve on a daily basis. The introduction of additional overhead lines in this area could be potentially hazardous for these birds.
- 8.4.309 One respondent suggested that not only migrating birds would be affected, but that the overhead lines would cross a grass meadow that has not been cultivated for 20 years. They further commented that this meadow has a wealth of birdlife that has been enhanced by wetland scrapes created in 2018 for wintering waterfowl under Higher Level Stewardship, part of the Environmental Stewardship scheme.

## Landscape and visual

- 8.4.310 Many people commented that overhead lines would present a visual impact in the Kent countryside and are not aesthetically pleasing. One respondent commented that as an area of historic, heritage and natural significance the setting has an important contribution on its special interest. They went on to suggest that if changes are being made there needs to be information made available to help them understand what the impacts of the changes are. The visual appearance impacts how the area relates to its history. Overhead lines that are more than double the current infrastructure is a significant change which is more than substantial harm to the site.
- 8.4.311 One respondent stated that the landscape and visual impact of the proposed converter station and substation would be exacerbated by the presence of overhead lines and associated pylons.

## Summary of Regard

- 8.4.312 The objective of the following paragraphs is to provide a summary of National Grid’s regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:
- Section 25, Table 1.17 Ornithology; and
  - Section 25, Table 1.1 Landscape and visual.

## Ornithology

- 8.4.313 The potential for impacts on birds is acknowledged by National Grid. As part of the Proposed Project Environmental Statement, it commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to **Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey** and the surveys are reported in **Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report**. The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. The potential impacts on birds in Kent is presented in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**. Bird diverters are to be included on the new section of overhead line. Mitigation measures are detailed in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of the draft DCO (**Application Document 3.1**).

- 8.4.314 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for non-breeding golden plover that move inland from Pegwell Bay to feed on farmland around the Kent Onshore Scheme has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. This commitment is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity and Application Document 6.6 Habitats Regulations Assessment Report**.
- 8.4.315 National Grid recognises the importance of the English East Coast and its coastal wetlands as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity, and Application Document 6.6 Habitats Regulations Assessment Report**, which consider the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway.

## Landscape and visual

- 8.4.316 National Grid acknowledges concerns regarding the visual impact of overhead lines which is summarised in Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual and detailed within Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment.
- 8.4.317 Following feedback from stakeholders and the public following both Non statutory consultation and Statutory consultation, National Grid reviewed the engineering design to remove the need for the overhead lines across the railway and the River Stour.
- 8.4.318 The poor ground conditions under the railway preclude the use of trenchless technology to cross from the substation to the overhead line; these would cause issues for the railway line. National Grid looked further up towards Minster for a crossing point where the ground is more suitable, and this would introduce more trenching, ditch crossings and land take. Once across the railway, the river would still have to be crossed which proves difficult again due to the ground conditions. Once under the river, it would then need to build further electrical infrastructure (a smaller substation) in the flood plain.
- 8.4.319 Considering all of the engineering challenges set out above alongside the environmental impacts of a larger footprint of the construction works and the safety concerns over going under the railway, the conclusion was to use overhead lines.



- 8.4.320 The potential for impacts on the setting of heritage assets was discussed with key stakeholders including Kent County Council and Historic England and, as part of this procedure, a list of assets to fully assessed was agreed. The assessment of impacts on cultural heritage can be found in Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.

## Question 17 (Kent) – ‘Anything else? Comments’

### General commentary on anything else when developing our proposals in Kent?

- 8.4.321 National Grid received 477 individual relevant responses to this question. In order to identify respondents’ opinions on any further comments to be taken into consideration when developing the proposals in Kent as presented at the Statutory consultation, National Grid reviewed each relevant response and categorised them into the topics listed in Table 8.2. The themes that attracted the most comments were:

- alternative solutions; and
- combined effect of the Proposed Project.

### Alternative solutions

- 8.4.322 Many respondents suggested National Grid consider alternative solutions for developing the proposals in Kent such as the use of a brownfield site for the converter station and landfall, development entirely offshore or simply avoiding valuable and protected areas, highlighting Pegwell Bay and Minster Marshes. Sites suggested were the old power station site at Richborough and the old Manston airfield.

### Combined effect of the Proposed Project

- 8.4.323 Many respondents commented regarding the overall impact of the Kent proposals, citing terrestrial ecology impacts including the permanent loss of trees and hedgerows, impacts on agricultural land, noise and air impacts, impacts on local roads, potential for increasing flooding and landscape and visual impacts, among others. Some of the issues raised were:
- devaluation of housing;
  - cumulative impact of the Proposed Project together with other industrial and housing developments in the area;
  - wildlife threat and the loss of habitat for wetland species such as herons and egrets; red and amber listed species including golden plover and peregrine falcons; resting places and safe passage for migratory birds, especially during high tides;
  - impacts on SSSI, Ramsar internationally designated wetland site, SPA, Special Area of Conservation;
  - impacts on heritage assets and archaeology; and
  - light pollution reducing Thanet’s access to dark skies and star views.

## Summary of Regard

8.4.324 The objective of the following paragraphs is to provide a summary of National Grid's regard to the feedback received. Further regard on the themes mentioned in these paragraphs can be found in the following sections and tables of **Application Document 5.1.6 Appendix E Statutory Consultation**:

- Section 25, Table 1.25 Alternative solutions; and
- Section 25, Table 1.22 Combined effects of proposed project.

## Alternative solutions

8.4.325 In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites such as Richborough and Manston. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. The EIA has identified likely significant effects of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**). The EIA process has also identified opportunities to enhance biodiversity interests and these are reported in the **Application Document 7.1 Planning Statement** and **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.

8.4.326 National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.

8.4.327 It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.

8.4.328 This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.

## Combined effect of the Proposed Project

8.4.329 National Grid acknowledges the fact that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive **Application Document Volume 6 Environmental Statement** has been prepared as part of the DCO submission. The Environmental Statement summarises the findings of the Environmental Impact Assessment to inform decision-

makers (in this case the SoS) about the environmental implications of the Proposed Project.

8.4.330 The documents that are relevant to the feedback given are:

- **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity;**
- **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism;**
- **Application Document 6.6 Habitats Regulations Assessment Report;**
- **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage;** and
- **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual.**

8.4.331 The ES includes an assessment of the potential intra-project cumulative effects resulting from the Kent Scheme which can be found in **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Intra-Project Cumulative Effects**. In summary, the intra-cumulative effects assessment concluded that in Kent there are potential for significant adverse effects for the following receptors:

- Residential receptors during the construction and decommissioning phase for those residential receptors which are likely to be subject to minor adverse noise effects as assessed in the Noise and Vibration chapter (**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**) and where visual amenity effects at these same locations were assessed as significant within the Landscape and Visual chapter (**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**).
- For users of PRoW TE39 and Saxon Shore Way as user experience effects were assessed as significant within the Socio-Economics Recreation and Tourism chapter and may also be subject to minor adverse severance, pedestrian delay and PRoW diversions and closures impacts as defined within the Traffic and Transport chapter (**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**).
- For users of PRoW TE37 during construction and decommissioning and the as visual amenity effects were assessed as significant within the Landscape and Visual chapter and the regional trail may also be subject to minor adverse socio-economic effects (**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**).

8.4.332 **Application Document 6.6 Habitats Regulations Assessment Report** concludes that there will be no adverse effects on European site integrity in combination with other plans or projects with the Proposed Project delivering the identified mitigation (a range of measures including noise fencing or other mitigation during construction, seasonal restrictions on compound set up works near to Sandlings SPA, replacement habitat for the loss of functionally linked land for golden plover in Kent, and bird diverters on the new section of overhead line in Kent).

**Question 18 (Construction) – ‘Do you have any key concerns regarding the construction stage of Sea Link? Please select all that apply.’**

## **Response to Q.18**

8.4.333 For question 18, respondents were able to select as many issues as they wanted. The top selected issues were landscape and visual impact (selected 1,108 times) and ecology and biodiversity (selected 1,100 times), closely followed by impact on people (928 times), then disruption to land use (874 times) and public access to rights of way (821 times).

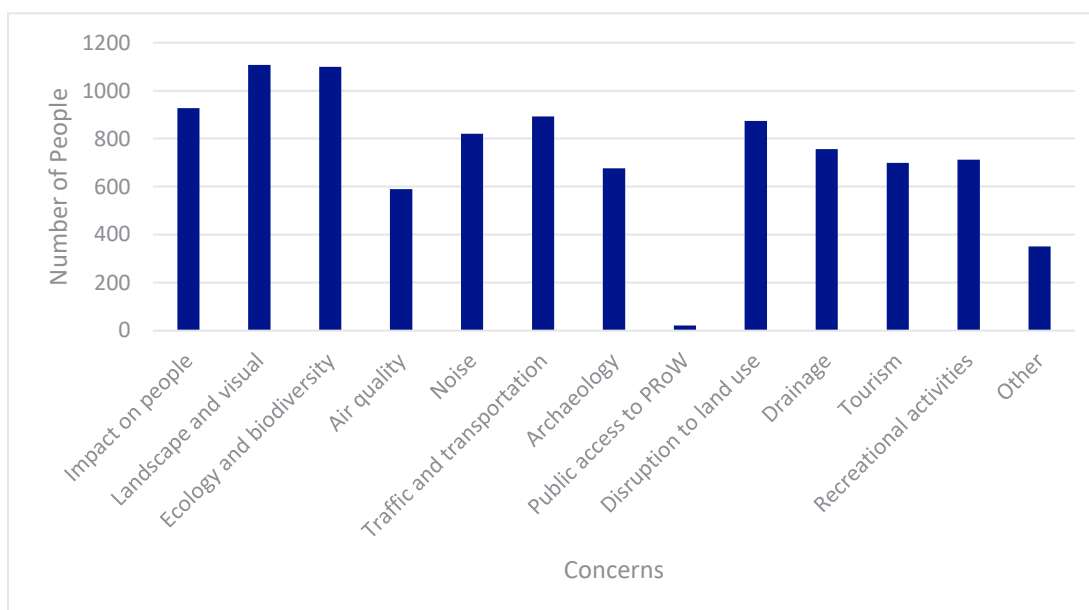


Plate 8.17 Response to Q.18 ‘Do you have key concerns regarding the construction stage of Sea Link? Please select all that apply.’

## Summary of Regard

### Construction

8.4.334 The impacts relating to the construction phase of the Proposed Project have been considered in the specialist chapters of the ES. Specific assessments have been undertaken for construction dust, noise (including traffic noise), vibration and traffic. The DCO submission also includes the following documents which the construction contractors will adopt and implement during their works. These documents are secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**:

- **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk;**
- **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent;**
- **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan;**
- **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan; and**

- **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice.**

## Question 19 – ‘Do you have any comments about how we could deliver environmental mitigation and enhancement (such as hedgerow creation, native tree planting or funding local wildlife groups) as part of our proposal?’

8.4.335 National Grid received 830 relevant responses to this question. A large number of respondents commented that no matter what measures were adopted, the Proposed Project impacts could not be mitigated for, particularly in relation to the loss of natural habitats, and that it should not be developed in its current form; alternative sites should be sought such as brownfield sites or developing offshore. With regard to potential mitigation and enhancement measures, some key themes were seen as follows:

- design: reduce the amount of hardstanding, reinstatement of all affected areas, use of tunnelling where possible, consideration to lighting design (down lights to reduce light spill), think about reuse and recycling at the project outset, noise mitigation to reduce levels, minimise cable lengths;
- biodiversity: 10% biodiversity net gain, purchase additional land for habitat creation, detailed surveys of all areas affected by independent experts, the planting of trees, hedgerows, linking of wildlife areas with corridors, hides for bird watching, bird nest boxes, bat boxes, bee hotels, holes in fencing for wildlife to travel through, replacement of lost habitat, avoidance of breeding seasons for construction, monitoring of bird deaths relating to pylons, involve local wildlife groups and experts, ongoing maintenance;
- designated areas: protect Goodwin Sands;
- landscape: use of green walls and roofs for buildings, work together with all projects in the area to develop a landscape strategy for the area to mitigate impacts;
- agriculture: as much land as possible to be used for farming once construction is completed;
- recreation: maintain existing footpaths and create more wheelchair friendly footpaths;
- socio-economic: compensate/provide subsidies for local businesses, provide funds to schools for forest schools and outdoor learning/recreation activities;
- traffic: use rail wherever possible to reduce vehicle movements, construction of a footbridge over the River Stour to connect with the Saxon Shore Way; and
- coordination with other National Grid projects to deliver a cohesive mitigation strategy.

## Summary of Regard

### Mitigation

8.4.336 National Grid welcomes all consultation feedback in relation to mitigation. The EIA assesses the effects of the Proposed Project on the environment and where significant effects have been identified, the assessment presents the proposed mitigation that

would be implemented to reduce the effect. A register of mitigation measures is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

- 8.4.337 As part of the EIA, National Grid undertook a suite of environmental surveys as part of developing an understanding of the baseline environment which has been used, alongside desk-based data, to design the appropriate mitigation and enhancement proposals.
- 8.4.338 Mitigation measures are developed for both the construction and operation phases of the Proposed Project. With regard to the abovementioned points, a summary of the regard is as follows:
- design: National Grid have developed design principles for both the Suffolk and Kent project elements. The scope of the principles is not limited to any one design discipline and instead reflect a multi-disciplinary approach for coordinated design in the round. As such the design principles cover several design disciplines including architecture, landscape architecture, ecology, hydrology, civil engineering, wider engineering disciplines, town planning, archaeology and heritage. Climate change is an important consideration as is developing the design to minimise light and noise intrusion, maximising the use of trenchless techniques in sensitive areas, and the use of sustainable construction techniques and efficient use of responsibly sourced materials. Details are contained in **Application Document 7.12.1 Design Principles – Suffolk and Application Document 7.12.2 Design Principles – Kent**).
  - biodiversity: an extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place. The Proposed Project is committed to achieving 10% Biodiversity Net Gain. Details are contained in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
  - biodiversity: as part of the Proposed Project, National Grid is providing land for environmental mitigation, enhancement and biodiversity net gain. Meetings have been held with Natural England where the approach to mitigation has been discussed. At the time of Statutory consultation, the possibility of creating new wetland south of the River Stour was explored but technical challenges were identified in discussion with hydrologists and Natural England in keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256.
  - biodiversity: National Grid has consulted Natural England with regard to seasonal restrictions to protect wildlife. Seasonal restrictions are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
  - Monitoring and management of any mitigation and/or reinstatement is covered within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk and Application Document Outline Landscape and Ecological**



**Management Plan - Kent** which are secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

- designated areas: since the production of the PEIR and Statutory consultation, the Offshore Scheme has been re-routed to avoid the Goodwin Sands MCZ. The Proposed Project does not interact with Margate and Long Sands SAC and there are no anticipated impacts on this site;
- landscape: National Grid welcomes comments relating to the design of the proposed converter station in Suffolk and feedback received will be taken into account when developing the detailed design. National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section of the ES. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders. Furthermore, the ES sets out the environmental considerations, including landscape and visual considerations, which have informed the siting and outline design of the proposed Converter Station. The design of this structure, in terms of the building form and the external materials, will be developed alongside consultation and stakeholder feedback. A set of Design Principles for the building is provided with the application for development consent (**Application Document 7.12.1 Design Principles – Suffolk**). The Design Principles will provide guidance regarding the design intent and design principles that will be adopted and embedded into the detail proposals of the structure. National Grid will continue to engage with relevant stakeholders throughout the development of the converter station site design and in establishing masterplanning principles and is engaging with local design panels to further inform the design and development process;
- agriculture: National Grid acknowledges this comment. It is in close contact with landowners and affected farmers regarding reinstatement and what the land can be used for following construction;
- recreation: where National Grid has a temporary impact on a public right of way during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided. Where feedback is related to the provision of community benefits such as wheelchair friendly paths, National Grid is considering these suggestions and will work with stakeholders and local communities to develop its proposals;
- socio-economic: National Grid supports community benefit and believes that communities should benefit from hosting infrastructure. It has a number of existing programmes that deliver this; however, it is waiting for the Government's position on the provision of community benefits associated with transmission infrastructure. This will determine its future approach. National Grid is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and, as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this;
- traffic: the potential to deliver construction materials by rail was investigated at the Scoping stage and although limited benefits were identified, this was not pursued as HGVs would be required to transport materials between railway sidings and the Order Limits, and the use of the railway line for freight could potentially impact rail passenger services on the main line and Sizewell-related services on the branch line. National Grid welcomes the suggestions for delivering community benefits and,

as the Proposed Project progresses, it will work with Stakeholders and local communities to further inform this; and

- National Grid has engaged with other project developers, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. In doing so, National Grid acknowledges the respondent's concerns about the potential impacts of the Proposed Project and is committed to developing a project that takes account of the feedback received during the course of consultation to avoid or minimise as far as possible and to mitigate the significant effects of the construction and operation phases. National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities (see **Application Document 7.10 Coordination Document**).

## Compensation

- 8.4.339 National Grid supports the delivery of community benefits associated with transmission infrastructure and already has a number of established programmes which deliver this. For example, it operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction.
- 8.4.340 The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. National Grid support this and believe it should be flexible, allowing community benefits to respond to local and regional need. Whilst it awaits clarity on the Government's position, it is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this.

## Question 20 – ‘Do you have any other comments about Sea Link to give that you have not previously mentioned?’

- 8.4.341 National Grid received 465 relevant responses to this question. Many respondents took the opportunity to reiterate comments that they had already made in the Feedback Form particularly in relation to the fact that they did not want the development in their local area and they thought that National Grid should look at alternative sites.
- 8.4.342 Some felt that the consultation exercise was insufficient in scale, and there was too much technical language used. Several suggested that the red lines on the Proposed Project maps showing the Draft Order Limits were confusing and they didn't understand what they were. Some stated that they wished National Grid would listen to the local people with regard to their objections and others commented that the consultation exercise was a waste of money. Conversely, a few suggested that National Grid should continue with their plans, restricting public opinion and not spend so much money on consultation exercises. Others commented that National Grid should continue with its proposals as there is a need for renewable energy to tackle climate change.
- 8.4.343 Several respondents commented that they supported the need for renewable energy, but they were not in favour of Sea Link due to its environmental impacts. Furthermore, they suggested the Proposed Project was not needed in Suffolk and Kent. Consideration of alternative sites was requested by many.

- 8.4.344 Many respondents commented that National Grid had failed to present the Proposed Project along with other projects in the area, highlighting that if all the proposed projects were constructed over the next 10 years, the impacts would be devastating for Suffolk and Kent. Coordination between all National Grid projects was requested by many.
- 8.4.345 With regard to the construction phase, a few respondents requested a detailed programme of works in order to determine the expected impacts. Information on decommissioning and reinstatement of disturbed land was requested.
- 8.4.346 Many respondents suggested that the combined effect of the Proposed Project would be detrimental to both Suffolk and Kent, citing impacts relating to air quality, noise, terrestrial ecology, road congestion, landscape (visual) and impacts to the local tourism economy, the latter for Suffolk.

## Summary of Regard

- 8.4.347 Reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
- 8.4.348 National Grid has listened extensively to the views of stakeholders and the general public throughout the development of its proposals. Whilst some of the information provided at Statutory consultation was technical, National Grid endeavoured to provide explanations throughout the consultation material. Examples of this are a non-technical summary of the PEIR, a 10-minute read of the Project Background Document and interactive maps of the Proposed Project website.
- 8.4.349 As part of the DCO submission, National Grid has prepared **Application Document 7.10 Coordination Document**. This document provides an overview of the coordination efforts to date, including details of ongoing coordination activities in the design stages, proposed approaches to coordination in the forthcoming DCO application process and throughout the delivery phases of the related projects.
- 8.4.350 Available information on the Proposed Project programme can be found in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Detailed programme information will not be available until construction contractors are appointed.
- 8.4.351 National Grid acknowledges the fact that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Application Document Volume 6 Environmental Statement has been prepared as part of the DCO submission. The Environmental Statement summarises the findings of the Environmental Impact Assessment to inform decision-makers (in this case the SoS) about the environmental implications of the Proposed Project. Where necessary, and insofar as is possible, measures will be implemented to mitigate identified significant effects. The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 8.4.352 The Environmental Statement includes an assessment of the potential intra-project cumulative effects resulting from the Kent Onshore Scheme which can be found in

Question 27 – ‘What is your Gender?’

Response to Q27

8.4.353 In response to question 27, where respondents were asked to indicate their gender, 42% of responses were from females, compared to 48% from males. A further 9% of respondents did not wish to provide their gender, and 1% declared themselves non-binary (Plate 8.18)Plate 8.18 Response to ‘What is your gender?’.

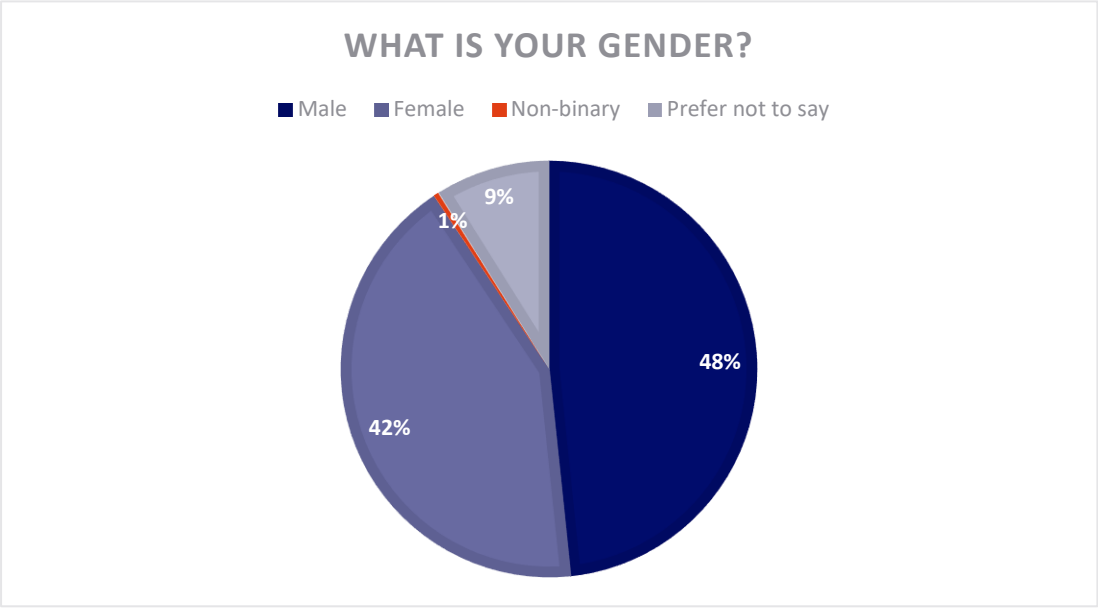


Plate 8.18 Response to ‘What is your gender?’

Question 28 – ‘Do you consider yourself a person with a disability?’

Response to Q28

8.4.354 In response to question 28, where respondents were asked if they consider themselves to have a disability, the majority of respondents (80%) indicated that they did not, whilst a small proportion (9%) indicated that they did. The remaining 11% of respondents did not wish to answer.

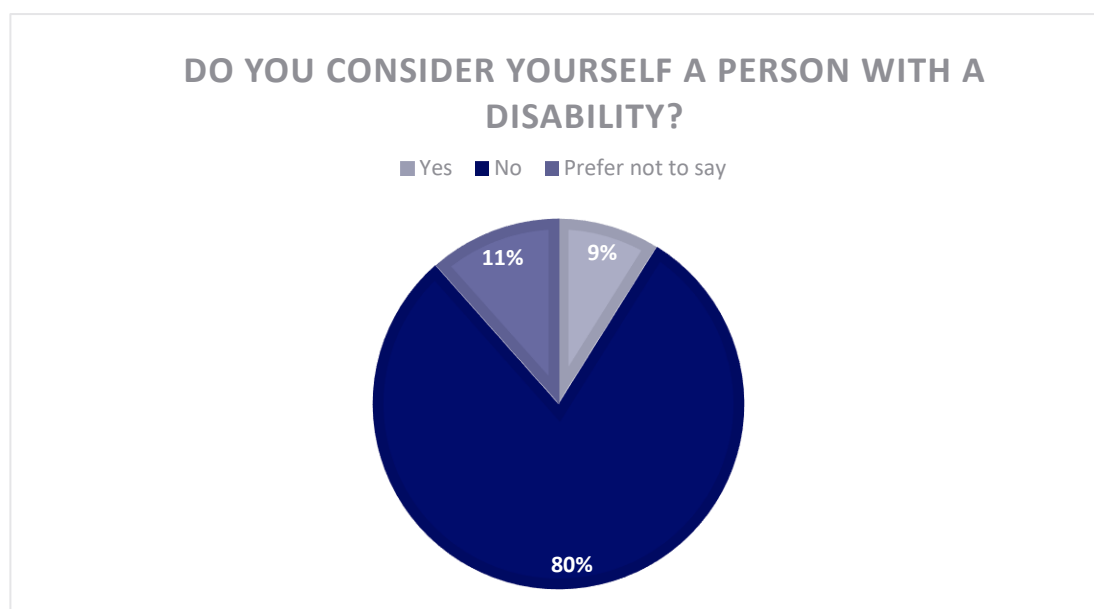


Plate 8.19 Response to 'Do you consider yourself a person with a disability?'

# Question 29 – ‘How would you describe your ethnic background?’

## Response to Q29

8.4.355 A total of 1,093 people answered question 29. Out of these, the majority of respondents (1,021) indicated they were ‘White British (white English, Welsh, Scottish, Northern Irish or British)’. As can be seen from Plate 8.20, the remaining 72 respondents were split across 11 categories.

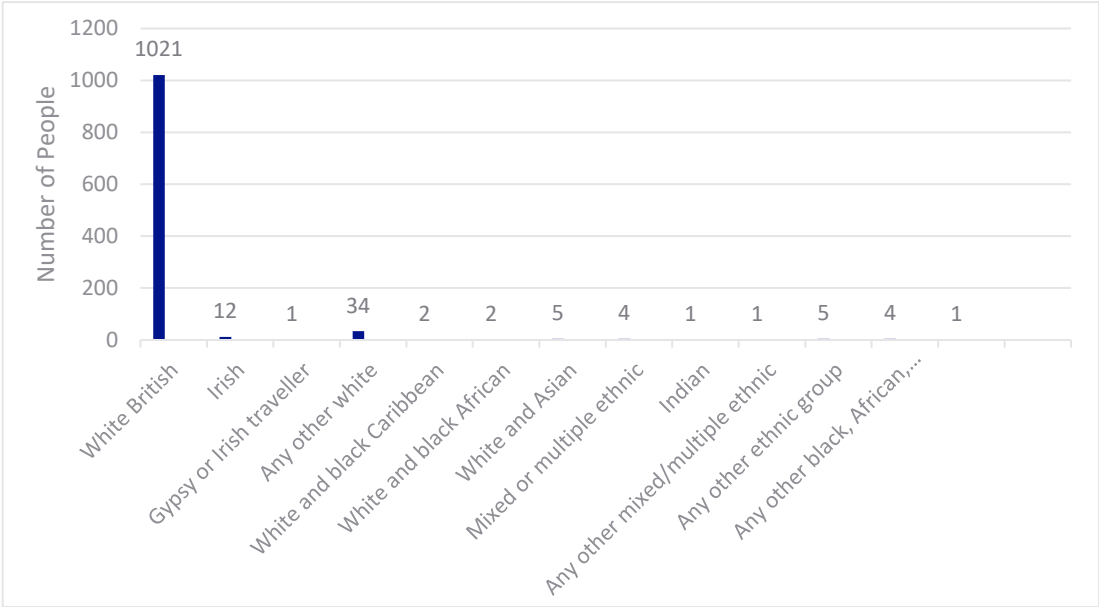


Plate 8.20 Response to ‘How would you describe your ethnic background?’



# Question 30 – ‘What is your age?’

## Response to Q30

8.4.356 In response to question 30, where respondents were asked their age, 55% of respondents ticked that they were in the 55-64 age group category, 23% were in the 45-54 age group category, 11% were in the 35-44 age group category, 9% were in the 25-34 age group category and the remaining 2% were in the 18-24 age group category (Plate 8.21).

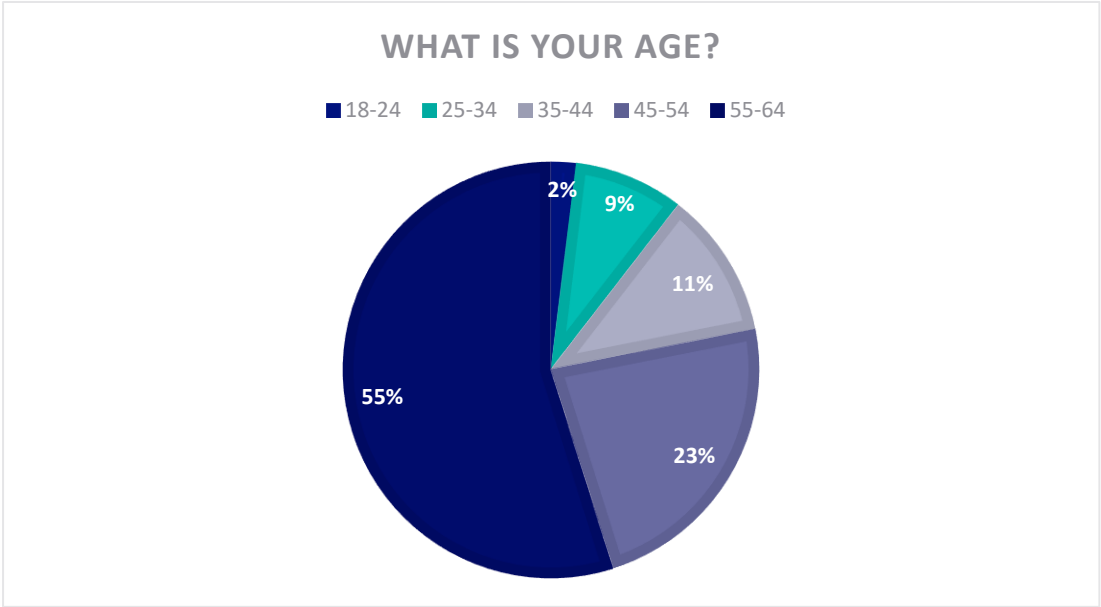


Plate 8.21 Response to ‘What is your age?’

## 8.5 Summary

- 8.5.1 Table 8.4 provides a high-level summary of the feedback received during Statutory consultation, grouped in themes, together with National Grid’s response. Section 24 of **Application Document 5.1.6 Appendix E Statutory Consultation** provides all the Section 42 feedback received verbatim split into the relevant categories in accordance with the guidance, together with National Grid’s response, and section 25 provides a more detailed, themed summary of the feedback from Section 47 and Section 48 respondents.
- 8.5.2 The table shows which type of consultee raised a particular issue. Where the feedback has led to a design change this is noted in the last column of the table with a simple Y for yes and N for no.

Table 8.4 Summary of Statutory consultation feedback

| Ref.                        | Summary of issue                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Landscape and visual</b> |                                                                                                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| LV1                         | Impact of the Proposed Project on the Suffolk Coasts and Heath AONB and the landscape character of the designation. | X    | X    | X    | X      | <p>The designated status of the landscape is acknowledged by National Grid. The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB are summarised within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>. The assessment takes into account the Natural Beauty indicators and the relevant associated Suffolk Coast and Heaths AONB indicators relating to natural beauty indicators to landscape and visual matters.</p> <p>The routing, design and mitigation of the Proposed Project has been designed as far as possible to avoid impacts on the Suffolk Coasts and Heath AONB. Consideration of this issue and the need to reduce impacts has been embedded into the design of the project from an early stage and as a result there are no significant adverse effects predicted on the AONB for any stage of development. Saxmundham Converter Station or Friston Substation (under Friston Scenario 2) are not likely to be perceptible from the AONB. There would be some minor effects during construction and at Year 1 of operation on the AONB due to, for example, minor tress loss as a result of installation of the underground HVDC cables and temporary filtration ponds. At 15 years post construction, there will no more than negligible effects on the AONB as a result of the Proposed Project.</p> | N             |
| LV2                         | Impact of the Suffolk Converter Station on                                                                          | X    |      |      | X      | NPS EN-1 paragraph 5.10.5 recognises that ' <i>Virtually all nationally significant energy infrastructure projects will have adverse effects on</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N             |

| Ref. | Summary of issue                                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|----------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | the landscape character of local residential areas of Sternfield and Saxmundham. |      |      |      |        | <p><i>landscape</i>'. Given that Saxmundham and Sternfield are two of the closest areas to the Saxmundham Converter Station, it is challenging to entirely avoid adverse effects to these areas. However, regard has been given to reducing these impacts through aiming to utilise existing screening, locating the Converter Station towards the lower impact southern extent of the site away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact to surrounding residential areas. This is secured in the Design Principles – Suffolk, which states that the detailed design shall aim to locate the smallest feasible compound and the building mass within it, as far south as possible within the defined LoD to reduce visual impact and assist following projects in optimising their locations to mitigate cumulative impacts of the masterplan, where this does not conflict with other principles (e.g. need to retain space for future projects).</p> <p>The assessment on visual amenity is summarised within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed in <b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b>. The representative viewpoints chosen include Important Views identified in the Saxmundham Neighbourhood Plan as well as other residential receptors within the areas of Sternfield and Saxmundham. The likely effects arising from the Suffolk Onshore Scheme has also informed the proposed mitigation plans, including proposed native woodland on the northern edge of the Saxmundham Converter Station. Mitigation planting along the permanent access route has also been developed in collaboration with the cultural heritage team to also minimise heritage impacts.</p> |               |
| LV3  | Construction of the Suffolk Converter                                            | X    | X    |      | X      | The effects arising from the Suffolk Onshore Scheme on landscape character is summarised within <b>Application Document 6.2.2.1 Part 2</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |

| Ref. | Summary of issue                                                                                                                                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | Station leading to a change in the landscape character of the wider character of the area, going from a rural landscape to an industrial one. Impact on the setting of Hurts Hall and St John's Church. |      |      |      |        | <p><b>Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>. This sets out anticipated changes to key characteristics of published Landscape Character Areas at different project stages.</p> <p>The impacts on cultural heritage in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>. The potential for impacts on the setting of heritage assets was discussed with key stakeholders including Suffolk County Council and Historic England and, as part of this procedure, a list of assets to fully assessed was agreed.</p> <p>As discussed above, the Converter Station has been sited and designed to minimise the impact on landscape character, whilst acknowledging that it is not possible to remove impacts entirely due to the scale and nature of the development. Following design and mitigation measures implemented to reduce the impact of the Converter Station at the Fromus Bridge, there are not predicted to be any significant adverse heritage or landscape/ visual effects on Hurts Hall or St John's Church as a result of the proposed development. The construction activity would also not affect the historic connection between Hurts Hall and St John's Church, Saxmundham, with this connection being noted within the published Landscape Character Assessment.</p> |               |
| LV4  | Mitigation in the form of planting will not be effective in screening the Suffolk Converter Station due to its height and large scale.                                                                  | X    |      |      | X      | National Grid acknowledges that it will take some time for planting to establish and that the scale of the Saxmundham Converter Station will result in landscape mitigation screening being unable to visually screen parts of the infrastructure. The mitigation planting heights that have been used within the year 15 photomontages were informed by arboriculture specialists and evidence of growth rates from a local planting scheme near to the Suffolk Onshore Scheme provided by East Suffolk Council. Such planting heights are set out within <b>Application Document</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N             |

| Ref. | Summary of issue                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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|      |                                                              |      |      |      |        | <b>6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology.</b> These growth rates are considered to be conservative and have considered the future requirements of climate resilience with the variety of species proposed within the indicative species mixes. Further details on the mitigation planting should be referred to within <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| LV5  | Impact of the Kent landfall on the landscape of Pegwell Bay. | X    | X    |      | X      | <p>The landscape sensitivity of Pegwell Bay is noted. The assessment of effects arising from the Kent Onshore Scheme on landscape character is summarised within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment</b>. This includes reference to the potential effects of the landfall on the relevant published Landscape Character Area.</p> <p>Table 3.1 in Appendix 3.1C assesses the impact on TDLCA F1 Pegwell Bay during construction and concludes that there would be direct effects on the LCA associated with the cable laying barge and other vessels temporarily within Pegwell Bay and out at sea. There would also be direct effects associated with construction access within the northern part of the LCA, including along the former hoverport site. These effects would have a negligible significance of effect during construction and were scoped out of the operational assessment as the only direct effect on the LCA would be a very short section of monitoring access with occasional use.</p> <p>From a visual amenity perspective Viewpoint 2 is representative of recreational users of Pegwell Bay Country Park, which is recognised as a viewpoint of 'very high sensitivity'. The landscape character Proposed Project is predicted to have a 'small' magnitude of effect and a 'minor' adverse effect, which is not significant. Therefore, no further design changes are required to address the impact Pegwell Bay. Whilst the design itself has not changed, around the landfall point at Pegwell Bay</p> | N             |

| Ref. | Summary of issue                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|------|-------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                     |      |      |      |        | we would use a trenchless construction method to install cables beneath the surface, therefore minimising disturbance to the natural environment at this point and reducing impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| LV6  | Impact of the Kent Converter Station on the flat, rural landscape and the setting of local cultural sites such as Richborough Fort. | X    | X    |      | X      | <p>The effects arising from the Suffolk Onshore Scheme on landscape character is summarised within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>. This includes reference to the potential effects of the Minster Converter Station on the relevant published Landscape Character Area.</p> <p>The potential for impacts on the setting of heritage assets was discussed with key stakeholders including Kent County Council and Historic England and, as part of this procedure, a list of assets to fully assessed was agreed. Impacts on cultural heritage in <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage</b>.</p> <p>NPS EN-1 paragraph 5.10.5 recognises that '<i>Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape</i>'. Given the size and nature of the Converter Station, there are inevitable significant adverse landscape effects in the area where the Converter Station is located. However, the effects have been minimised through the optioneering process and application of the mitigation hierarchy throughout the design process.</p> <p>8.5.3 Richborough Saxon Shore Fort stands in an elevated position on the south side of an area formally occupied by the Wantsum Channel. The value of this asset derives from its archaeological interest, and the information it could provide relating to the history and development of the Roman military in the area, as well as the associated civilian settlement.</p> | N             |



| Ref. | Summary of issue                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Design change |
|------|----------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                              |      |      |      |        | <p>It also has some architectural value from the above ground remains that survive. As a scheduled monument it is considered to be of high value.</p> <p>8.5.4 While the Minster Substation and Minster Converter Station would represent new elements in the landscape to the north and northwest of the fort, these would be limited to a small element of the vista as is demonstrated by <b>Figure 6.4.3.1.8</b> in <b>Application Document 6.4.3.1 Landscape and Visual Representative Viewpoint Visualisations</b>.</p> <p>8.5.5 This would be further reduced because of the distance between the Minster Substation and Minster Converter Station and the fort. Furthermore, the alterations to the overhead lines and the new pylons required to accommodate the new overhead connection would not result in a significant change to the existing wirescape of the Minster Marshes when viewed from the fort. Finally, as the above ground infrastructure is located to the north and northwest, while the Ebbsfleet enclosure is located to the north-northeast, the Kent Onshore Scheme would not sever any views that that may have existed, or been significant, between the fort and the large enclosure on the Ebbsfleet Peninsula. The assessment concludes the magnitude of impact is negligible and therefore on an asset of high value this would result in a minor adverse effect which is not significant. Therefore, no further design changes are required to address the effect on this asset.</p> |               |
| LV7  | Impact of overhead lines for the Kent Onshore Scheme on the landscape character of the area. | X    | X    |      | X      | The effects arising from the Suffolk Onshore Scheme on landscape character is summarised within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b> . This includes reference to the potential effects of the proposed overhead lines on the relevant published Landscape Character Area. As discussed above,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N             |

| Ref. | Summary of issue                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|------|-----------------------------------------------------|------|------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                     |      |      |      |        | <p>whilst virtually all major infrastructure projects will have significant adverse landscape impacts</p> <p>At Statutory consultation, National Grid consulted on two options for overhead lines: a lower number of pylons with a higher height, and a higher number of pylons with a lower height. The first option was selected and was presented at Targeted consultation.</p> <p>The option selected results in fewer pylons, which reduces the area of habitat affected by the footprint of the towers. The solution proposed also reduced the area between lines to reduce the risk of birds becoming trapped between the existing and proposed overhead lines. Additionally, the location of these pylons was refined to reduce the size of the triangular area that would be formed by the construction of pylons between the existing overhead line and the proposed substation. On balance, the solution with fewer towers was considered to be preferred from an environmental perspective, with this decision being ecology driven.</p> |               |
| LV8  | Undertake landscape planting ahead of construction. | X    | X    |      | X      | <p>This principle has been incorporated into the application documents where possible. Where planting areas do not conflict with construction compounds and activities, advanced planting will be undertaken in the first available planting season prior to construction commencing. These areas will be developed in detail as part of the detailed LEMP but, subject to contractor discussions, could include the areas identified on <b>Figure 3 Saxmundham Converter Station Outline Landscape Mitigation - Timing of Planting</b> and <b>Figure 3 Minster Converter and Substation Outline Landscape Mitigation - Timing of Planting</b> within <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk</b> and <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent</b>.</p>                                                                                                                                                                                            | Y             |

| Ref. | Summary of issue                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Design change |
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| LV9  | The design of the converter stations should allow them to blend in with their surroundings. | X    | X    | X    | X      | <p>National Grid acknowledges the comments regarding the design of the converter stations to blend in with their surroundings. The assessment on potential landscape character and visual impacts is set out in <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b> and <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b>.</p> <p>National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section of the ES. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders.</p> <p>The design of these structures, in terms of the building form and the external materials, has been developed alongside consultation and stakeholder feedback including engagement with a Design Review Panel as explained in <b>Application Document 7.11.2 Design Approach Document – Kent</b> and <b>Application Document 7.11.1 Design Approach Document - Suffolk</b>. Design Principles have been provided with the application for development consent. The Design Principles provide guidance regarding the design intent that would be adopted and embedded into the detailed design of the structure. Refer to <b>Application Document 7.12.2 Design Principles – Kent</b> and <b>Application Document 7.12.1 Design Principles – Suffolk</b>. The Design Principles set out in Table 3.1 of both documents contain principles that ensure consideration is given to assimilating the converter stations into the landscape through design, roofline, materials, colours and massing. Landscaping proposals set out in the oLEMP also proposed landscaping measures to further assist in blending in with the landscape as far as possible. The design has therefore evolved to address this comment, which has also been discussed in meetings with key stakeholders.</p> | Y             |

| Ref.                       | Summary of issue                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Design change |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| LV10                       | Light pollution                                                                                                                                      | X    | X    | X    | X      | <p>The assumptions made about the lighting design that have informed the landscape and visual impact assessment are set out in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. Consideration of the landscape and visual effects of light pollution during construction and operation is presented in <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>, <b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b>, <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment</b> and <b>Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment</b>.</p> <p>Light pollution will be minimised during construction and operation as far as possible, whilst meeting National Grid specifications for lighting for safety, security and operational purposes. Measures to reduce light pollution from offshore and onshore development respectively are incorporated into <b>Application Documents 7.5.2 and 7.5.3 Outline Construction Environmental Management Plans</b> and their appendices.</p> | N             |
| <b>Terrestrial ecology</b> |                                                                                                                                                      |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| TE1                        | Construction in statutory designated areas in Suffolk such as the Sandlings SPA, Leiston to Aldeburgh SSSI and the RSPB North Warren Nature Reserve. | X    | X    | X    | X      | <p>National Grid acknowledges the sensitivity of the mentioned sites. Separate assessments of the Sandlings SPA and the Leiston to Aldeburgh SSSI as well as details of the necessary mitigation is included within <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b>. The design has evolved to include trenchless methods for the installation of cables to avoid direct impacts on Sandlings SPA or Leiston-Aldeburgh SSSI.. The commitment to a trenchless solution is contained in <b>Application Document 7.5.3.2 CEMP Register of Environmental Actions and Commitments (REAC)</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Y             |

| Ref. | Summary of issue                                                                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                           |      |      |      |        | <p>which is secured through Requirement 6 of Schedule 3 of the draft DCO section of</p> <p>Furthermore, following Statutory consultation the proposed construction compound in this area has been reduced in size and moved further away from the mentioned Statutory designations. In addition to reducing the potential for ecological effects, these changes have also helped to lessen the impact on nearby relevant receptors, residential properties and the flood zone. This revised design was presented at Targeted consultation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| TE2  | Impact on ecologically sensitive sites in Kent: Minster Marshes, Thanet Coast and Sandwich Bay SPA, Sandwich Bay and Hackling Marshes SSSI, Sandwich and Pegwell Bay NNR. | X    | X    | X    | X      | <p>The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works.</p> <p>National Grid can confirm that geotechnical investigation has established that trenchless methods are appropriate for traversing statutory designations, and these confirm the depth of the of bore. The DCO will therefore not include an option for surface trenching in the SSSI . Further details are contained in Appendix A of <b>Application Document 7.3 Design Development Report</b>. The commitment to a trenchless solution is contained in <b>Application Document 7.5.3.2 Register of Environmental Commitments and Actions (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. A rigorous impact assessment has been produced in line with guidance and legislation</p> | N             |

| Ref. | Summary of issue                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Design change |
|------|-------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                             |      |      |      |        | <p>which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust has taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements.</p> <p>National Grid is also committed to achieving 10% Biodiversity Net Gain on its major projects. Further details relating to the ecology assessment are contained in <b>Application Document ES 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b>. Further details regarding biodiversity net gain are contained in <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report</b>.</p> |               |
| TE3  | Impact on Margate and Long Sands SAC and Goodwin Sands MCZ. | X    | X    |      | X      | <p>Margate and Long Sands SAC is 3 km west of the Offshore Scheme. A detailed routing and siting study was undertaken to ensure the complete avoidance of the Annex 1 habitat features in this SAC.</p> <p>Following feedback received at Statutory consultation, the marine cable has been rerouted to avoid Goodwin Sands MCZ. This will avoid direct impacts and reduce the impacts to the known and potential benthic receptors located within the area including <i>Sabellaria spinulosa</i> and <i>Mytilus edulis</i>.</p>                                                                                                                                                                                                                                                                                                                                                             | Y             |
| TE4  | Loss of habitat for golden plover.                          | X    | X    | X    | X      | <p>Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour has been explored prior to Statutory consultation, but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with</p>                                                                                                                                                                                                                                                                                                            | Y             |



| Ref. | Summary of issue                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|----------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                      |      |      |      |        | Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. This commitment is contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> .                                                                  |               |
| TE5  | Failure to carry out ecological surveys and suggestions on what surveys need to be undertaken.                       | X    | X    |      | X      | As part of the ES, in addition to desk study data National Grid has undertaken an extensive programme of environmental surveys including for breeding and non-breeding birds, reptiles, invertebrates, badger, aquatic wildlife, riparian mammals, dormice and plants. The survey results were not available during Statutory consultation but are presented as part of the application.                                                                                                                                       | N             |
| TE6  | Suggestion to involve Suffolk and Kent Wildlife Trusts at the outset of the Proposed Project.                        |      |      |      | X      | National Grid has engaged with both Suffolk and Kent Wildlife Trusts throughout the development of their proposals as a non-prescribed consultee.<br><br>Other bodies consulted with regard to biodiversity were Natural England, Environment Agency, RSPB, Suffolk County Council, East Suffolk Council, Thanet Council, Dover Council and Kent Council.                                                                                                                                                                      | N             |
| TE7  | Concerns over the fact that the Proposed Project could lead to the same destruction of the area as the Nemo project. | X    | X    | X    | X      | The Nemo Link interconnector is a joint venture between National Grid Interconnector Holdings Limited, a subsidiary company of the UK's National Grid Plc, and the Belgian Elia group which is a separate entity to National Grid Electricity Transmission. While the Proposed Project does make landfall in Pegwell Bay, National Grid has committed to a trenchless technique to go beneath the sensitive saltmarsh habitat, in contrast to Nemo Link. Given the approaches are different, the impacts will not be the same. | N             |

| Ref. | Summary of issue                                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|------|-----------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                 |      |      |      |        | The Proposed Project has undertaken two campaigns of marine surveys which have included geophysical and geotechnical surveys which have covered the marine route. It has also undertaken intertidal surveys at each landfall which included phase I and phase II surveys to characterise intertidal habitats and species. These can be found in <b>Application Document 6.3.4.2.C ES Appendix 4.2.C Intertidal Surveys 2023</b> .                                                                                                                                                                                                                                                                                         |               |
| TE8  | Loss of woodland and the need to provide a detailed assessment and buffer zones around woodland to be retained. | X    | X    | X    | X      | Following Statutory consultation, National Grid undertook a survey of all trees within the Order Limits of the Onshore Scheme. <b>Application Document 6.10 Arboricultural Impact Assessment</b> details how trees located within and immediately adjacent to the Order Limits will be protected and what mitigation measures are embedded in the design to offset the loss of trees. The tree survey has led to small changes in the routing of the cable and changes to the location of the bridge over the River Fromus to avoid significant trees. Protection zones will be established around remaining areas of woodland and/or trees to be retained.                                                               | Y             |
| TE9  | Habitat segregation in Kent.                                                                                    | X    | X    |      | X      | Careful attention has been paid in the design and construction programme/methods for the Proposed Project to the possibility of habitat severance. In the coastal zone this will be avoided through use of a trenchless construction solution. In those areas away from the coast, which will be crossed by open trench, a series of protected species surveys have been undertaken to inform mitigation measures and the works will be undertaken in such a way as to retain connectivity, such as through the inclusion of mammal ledges in culverts and hurdles or similar to close gaps in hedgerows overnight for bats. The cable will be buried as each section is installed and habitats restored above the cable. | N             |
| TE10 | Essential to conduct monitoring of any                                                                          | X    | X    |      | X      | Monitoring and management of the reinstatement is covered within <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |

| Ref. | Summary of issue                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
|------|----------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | habitat reinstatement undertaken.                                                                              |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| TE11 | Request to provide details of proposed mitigation for terrestrial ecological receptors.                        |      |      |      | X      | Mitigation measures for the Proposed Project can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> . Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> .                                                                                                                                                                                                                                                      | N             |
| TE12 | Request to provide information on the impacts on the mudflats in the SPA.                                      |      |      |      | X      | <b>Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology</b> addresses the potential impact of the Proposed Project on the mudflats. This Chapter concludes that there are no significant effects.                                                                                                                                                                                                                                                                                                                                                             | N             |
| TE13 | Concern that no evidence has been provided to demonstrate that a trenchless construction solution is possible. | X    |      |      | X      | National Grid can confirm that geotechnical investigation has established that trenchless methods are possible and appropriate for traversing RSPB North Warren and the SSSI, and these confirm the depth of the of bore (see Appendix A of <b>Application Document 7.3 Design Development Report</b> ). The DCO will therefore not include an option for surface trenching in the SSSI. Further information on the construction methodologies is available within <b>Application Document ES 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> . | N             |
| TE14 | Concerns over the risk of frac-out from trenchless construction solutions.                                     | X    |      |      | X      | Commitment GH02 in the outline CoCP ( <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> ) includes for the provision of a Foundation Works Risk Assessment, where required in areas proposed for trenchless crossings. This will be undertaken in accordance with Environment Agency guidance and will include the risk of drilling fluid loss. Mitigation against frac outs is also included within <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan</b> .                                  | N             |

| Ref.                     | Summary of issue                                                                                                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Cultural heritage</b> |                                                                                                                                                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| CH1                      | Impact on the following in Suffolk: <ul style="list-style-type: none"> <li>• Setting of the village of Sternfield;</li> <li>• Medieval village of Friston;</li> <li>• Old Aldeburgh harbour;</li> <li>• Thorpeness village.</li> </ul> | X    | X    | X    | X      | 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. Impacts on cultural heritage from the Suffolk Onshore Scheme are considered in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b> and for the Kent Onshore Scheme within <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage</b> on all receptors that have the potential to result in 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. As stated within the chapters, residual effects of the Proposed Project on cultural heritage receptors in both Kent and Suffolk following the implementation, where necessary, of additional mitigation measures are assessed to be not significant. | N             |
| CH2                      | Impact on historic sites in Pegwell Bay where St Augustine and Julius Caesar are reported to have landed.                                                                                                                              | X    | X    | X    | X      | The impact on the Roman Richborough Fort is assessed in the ES, with visualisations from Richborough Fort are provided in <b>Application Document 6.4.3.3.8 Representative Viewpoint Visualisations</b> . The Fort is recognised as being a high value asset, but with only a negligible magnitude of effect to the setting predicted. Therefore, a minor (non-significant) adverse effect.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |               |
| CH3                      | Impact on the Roman Richborough Fort.                                                                                                                                                                                                  | X    | X    |      | X      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| CH4                      | Need checking for artifacts before going ahead with construction.                                                                                                                                                                      | X    |      |      | X      | As part of the Proposed Project EIA, baseline data has been collated. Please see <b>Application Document 7.5.4.2 Outline Overarching Written Scheme of Investigation (OWSI) – Kent and Application Document 7.5.4.1 Outline Overarching Written Scheme of Investigation (OWSI) – Suffolk</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |
| <b>Water environment</b> |                                                                                                                                                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |

| Ref. | Summary of issue                                                                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| WE1  | The construction of the Suffolk Converter Station, Friston Substation and the associated roadways and cabling in a floodplain and the risk of flooding to outlying areas. | X    | X    | X    | X      | <p>Flooding concerns are noted. <b>Application Document 6.8 Flood Risk Assessment</b> has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency, the Lead Local Flood Authority (County Council) and Internal Drainage Boards regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b>. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>Surface water runoff arising from the Proposed Project during both its construction and operation would be captured, suitably treated where necessary and attenuated prior to discharge into the surrounding water environment at rates no greater than existing (inclusive of suitable climate change allowances over the Proposed Project's lifetime). In addition, where the Proposed Project interacts with existing land drainage infrastructure, e.g. ditches, there is a commitment in the Water Environmental section of the REAC to manage any severance through provision of temporary alternative drainage routes and those drainage systems would be permanently reinstated or re-routed ensuring their existing function is maintained.</p> | N             |
| WE2  | Construction of the Kent Converter Station and landfall in an area prone to flooding. Risk of flooding to Proposed Project                                                | X    | X    | X    | X      | <p>During Statutory consultation, one of the key themes raised was construction in areas prone to flooding. The weight of feedback led to National Grid undertaking additional studies investigating the flood risk of the Proposed Project. The studies revealed the necessity to change the engineering solution at the Kent Converter Station to address flooding concerns which led to an increase in its height. This was consulted on at Targeted consultation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Y             |

| Ref. | Summary of issue                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Design change |
|------|------------------------------------------------------------------------------------------------------------|------|------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | infrastructure and outlying areas.                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| WE3  | The impact of climate change on the Proposed Project.                                                      | X    |      | X    | X      | A climate change risk assessment is included within <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b> . This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in EIAs. The project has been designed to be resilient to predicted climate change impacts as far as possible.                                                                                                                                                                               | N             |
| WE4  | The Proposed Project will limit the expansion of the Southern Water sewage treatment plant at Weatherlees. | X    | X    |      | X      | National Grid is aware of Southern Water's requirements and is maintaining ongoing dialogue with them about the potential impacts of the Proposed Project upon its assets in terms of ongoing maintenance, future needs and access to the waste water treatment works.<br><br>National Grid therefore intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of <b>Application Document 3.1 Draft Development Consent Order</b> .                                                                                                                                                                                | N             |
| WE5  | Effect of river crossings in Kent and effect on any existing drainage infrastructure.                      | X    | X    | X    | X      | The effects of the proposed permanent watercourse crossings have been assessed within <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment</b> and its supporting documents: <b>Application Document 6.8 Flood Risk Assessment and Application Document 6.9 Water Framework Directive Assessment</b> .<br><br>The Proposed Project team has engaged with the Environment Agency regarding the proposed crossings of main river watercourses, with key design parameters for the crossings having been agreed. Measures are embedded within the designs of these crossings to mitigate for any potential to increase fluvial flood risk. | N             |



| Ref.                            | Summary of issue                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                 |                                                                                                                                                                            |      |      |      |        | The DCO secures a commitment to monitor existing flood defences during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences. This commitment is contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> . Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| WE6                             | Changes to the hydrology and the water levels within the Leiston-Aldeburgh SSSI and RSPB North Warren nature reserve from the use of trenchless construction technologies. | X    |      |      | X      | <p><b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> confirms the use of trenchless technology under the Leiston to Aldeburgh SSSI and the North Warren RSPB reserve. This is in order to minimise surface-level disruption to this habitat.</p> <p>The characteristics of the geology beneath the reserve provide an impermeable barrier between surface water hydrology and ground water resources. This assessment has concluded that there would be no significant effects arising as a result of the tunnelling activity.</p> <p>Furthermore, Commitment GH02 in <b>Application Document 7.5.3.1 Outline Code of Construction Practice</b> includes for the provision of a Foundation Works Risk Assessment, where required in areas proposed for trenchless crossings. This will be undertaken in accordance with Environment Agency guidance and will include the risk of drilling fluid loss.</p> | N             |
| <b>Geology and Hydrogeology</b> |                                                                                                                                                                            |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| GH4                             | Need to obtain an understanding of the geology of the                                                                                                                      |      |      |      | X      | Available information on the geology of the Suffolk and Kent study areas has been collated and is presented in the relevant assessment Chapters: <b>Application Document 6.2.4.1 Part 4 Marine Physical Environment</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |

| Ref. | Summary of issue                                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | Proposed Project area.                                                                                                                                                 |      |      |      |        | The ground investigation report are contained in <b>Application Document 6.3.2.5.D Appendix 2.5.D Ground Investigation Report – Suffolk and Application Document 6.3.3.5.C Appendix 3.5.C Ground Investigation Report – Kent.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| GH5  | Concerns over the risk to existing groundwater abstractions and private water supplies and the need for the hydrogeological risk assessment to include these concerns. | X    |      |      |        | <p>Information on groundwater abstractions within the study area has been obtained and an assessment on the potential impacts on groundwater receptors including the abstractions is included within <b>Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology</b> and <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology</b>, the locations of the abstractions are also shown on the accompanying figures.</p> <p>The Environmental Statement is also supported by a groundwater risk assessment included within <b>Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment</b> and <b>Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment</b>. These assessments have informed the commitments currently proposed and identifies where additional hydrogeological risk assessment is likely to be required. Commitment GH09 in the REAC requires that a Hydrogeological Risk Assessment is undertaken during detailed design to assess the specific risks to groundwater and groundwater receptors at the sensitive locations and actions are undertaken to identify any additional mitigation or remediation that may be required. The REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |

## Agriculture and soils

| Ref. | Summary of issue                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
|------|------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| AGS1 | Concerns over the loss of productive agricultural and Best and Most Versatile land in Suffolk. | X    | X    | X    | X      | <p>A complete assessment of the impacts on agriculture in Suffolk has been undertaken. This is set out in <b>Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils</b>.</p> <p>Potential impacts on agricultural land have been assessed based on the final design presented within <b>Application Document ES 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>.</p> <p>The cable route will be reinstated to its previous use and therefore farming operations are able to continue post construction. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (<b>Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk</b>).</p> <p>The agricultural use of land within the majority of the Order limits will only be impacted on a temporary basis, with agricultural uses able to continue following construction for land incorporated for the installation of underground cables. There would be 11.45 hectares of Best and Most Versatile agricultural land permanently lost for the construction of the Suffolk Onshore Scheme, of which the majority is lost due to the construction of the new converter station. These elements of the project were required to be located within 5km of the consented Friston Substation, which restricted the area of search for a site. The objective to minimise loss of agricultural land was taken into account in site selection, but it was not possible to find a better site with a lower quality agricultural land.</p> <p>However, overall, the temporary nature of many of the construction activities and the subsequent restoration of the land, and its return to pre-construction use is likely to result in the avoidance of long-term impacts on agricultural and soil receptors. Mitigation measures that are embedded into the design of the Proposed Project to reduce, and where possible, avoid agricultural and soils effects are set out in <b>Application</b></p> | N             |

| Ref. | Summary of issue                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|------|---------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                             |      |      |      |        | <p><b>Document 7.5.3.1 CEMP Appendix A Outline CoCP and Application Document 7.5.3.2 CEMP Appendix B REAC.</b> As required by paragraph 5.11.14 of NPS EN-1 <b>Invalid source specified.</b>, outline Soil Management Plans (<b>Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk</b> and <b>Application Document 7.5.10.2 Outline Soil Management Plan – Kent</b>) have been prepared to minimise and manage effects on soils.</p> <p>Compensation claims for disturbance are considered on an evidence basis and landowners and farmers will therefore be encouraged to keep records to support their claims.</p> <p>Where productive land is lost as a result of the permanent infrastructure this needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy 'Security of Supply' and with helping the UK to meet its Net Zero target to reduce carbon emissions.</p> |               |
| AGS2 | Concerns over the impact to tenant farmers. |      |      |      | X      | <p>National Grid is and will continue to work with all landowners including tenants who may be affected by the proposals to understand the impacts on their operations and to work with them as the construction programme is developed. National Grid will seek to work with the farming community to limit disruption where practicable. The cable route will be reinstated to its previous land condition and therefore farming operations are able to continue post construction. The cable width is relatively minimal, and accommodation works will be discussed and agreed prior to commencement of construction to ensure disruptions to normal farming operations are minimised. Compensation claims for disturbance are considered on an evidenced basis and landowners and farmers will therefore be encouraged to keep records to support their claims.</p>                                                                                   | N             |

| Ref. | Summary of issue                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|------|-----------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| AGS3 | Concerns over the loss of productive agricultural land in Kent. | X    |      | X    | X      | <p>A complete assessment of the impacts on agriculture in Kent has been undertaken. This is set out in <b>Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils</b>.</p> <p>Potential impacts on agricultural land have been assessed based on the final design presented within <b>Application Document ES 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>.</p> <p>The cable route will be reinstated to its previous use and therefore farming operations are able to continue post construction. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (<b>Application Document 7.5.10.2 Outline Soil Management Plan - Kent</b>).</p> <p>There would be 12.21 hectares of Best and Most Versatile land lost in Kent as a result of the Kent Onshore Scheme, the majority due to the construction of the new Minster Converter Station and Substation. No alternative sites were identified with a lower quality of agricultural land that performed as well from a practical perspective and when taking into consideration other environmental considerations.</p> <p>Compensation claims for disturbance are considered on an evidence basis and landowners and farmers will therefore be encouraged to keep records to support their claims.</p> <p>Where productive land is lost as a result of the permanent infrastructure this needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy 'Security of Supply' and with helping the UK to meet its Net Zero target to reduce carbon emissions.</p> | N             |

| Ref. | Summary of issue                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
|------|---------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| AGS4 | Concerns over the stated depth of the cable at 0.9 m.                                             |      |      | X    | X      | <p>Based on feedback received during the consultation process, the typical depth of the cable trenches will be 1.5 m, see <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> for further information.</p> <p>National Grid can confirm that the minimum depth of burial of the cable to the top of the protective tile will be 0.9 m. In some instances, subject to discussion and agreement with the landowner this may be deeper, but this will depend on cable design.</p> <p>The cable depths presented are usual for projects of this nature.</p>                                                                                                                                                                                                                                                                                                                                                                                        | Y             |
| AGS5 | Impact of the link boxes and joint bay kiosks associated with cabling on agricultural operations. |      |      | X    | X      | <p>For HVAC cables a link box/ joint bay kiosk is required to enable inspection and testing of elements of the cable system. A link pillar is a small cabinet, typically 1 m wide, 0.5 m deep and 1.3 m high, although the precise dimensions can vary. Article 5 in the draft DCO specifies that these are no more than 2 m above ground level to provide a maximum parameter. Link boxes are buried chambers or boxes that sit within the link pillar. Consequently, these elements of the project are minor in nature so are not predicted to result in significant impacts.</p> <p>National Grid has endeavoured to allow sufficient space in the Order Limits to allow the consideration of the placement at the edge of fields or roads to enable future access and minimise the impact on agricultural operations.</p> <p>The HVDC cables do not require kiosks and all of the joint bay infrastructure for these cables will be underground accessed via a manhole cover or similar.</p> | N             |



| Ref. | Summary of issue                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| AGS6 | Query over what type of construction compounds are required and what negotiation has taken place with farmers in regard to their locations. |      |      |      | X      | <p>The construction compounds shown on the drawings at Statutory consultation were indicative. These are for the contractors to house offices, storage and parking for their plant and vehicles.</p> <p>National Grid has consulted landowners on the Proposed Project and their feedback and comments taken into account in the revised design. For example a request was made by a Kent landowner to move a construction compound from one piece of land to another in their ownership.</p>                                                                                                                                                                                                                                    | Y             |
| AGS7 | Query over the use of agricultural land for delivering BNG and opposition to the use of compulsory acquisition for delivering BNG.          | X    | X    |      | X      | <p>National Grid is working with local stakeholders to understand the opportunities for optimising Biodiversity Net Gain that is to be delivered by the Proposed Project. While the Proposed Project application does seek compulsory powers for certain works, including planting and environmental mitigation, it does not seek powers of compulsory acquisition for land that would be used solely for Biodiversity Net Gain (although this is an approach that is used on other DCO projects).</p> <p>All landowners affected by the Proposed Project have been consulted and feedback taken into account.</p>                                                                                                               | N             |
| AGS8 | Concern over heat dissipation from the underground cable sections.                                                                          | X    |      |      | X      | <p>Electric current passing through the cables generates heat that must eventually be dissipated to the atmosphere. The heat dissipation is limited in part through the temperature limit at which the cables can operate. The cable is designed to limit the maximum temperature that occurs at the 'worst case' location along the entire route. This 'worst case' is generally the location where the cable is at the greatest depth. This is generally associated with a trenchless installation or another crossing point where the cable passes under a watercourse or embankment, etc. Therefore, if the peak temperature is reached at this 'worst case' location then the temperature at shallower depths along the</p> | N             |

| Ref.                         | Summary of issue                                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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|                              |                                                                                                         |      |      |      |        | <p>route, such as through agricultural fields, will always be lower than this peak value as the cable is the same throughout.</p> <p>The cable system design is developed in accordance with the relevant National Grid Technical Specifications. These consider the seasonal variations of ground temperature and the system is designed based on the most onerous seasonal ground temperature considered, summer (the ground temperature is taken at 1 m depth).</p> <p>Further mitigation is provided through the separation of the cables and the provision of a thermally suitable surround material that helps to dissipate the heat uniformly away from the cables before it is conducted into the surrounding ground.</p>                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| <b>Traffic and transport</b> |                                                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| TT1                          | Concerns over the suitability of the local road network in Suffolk to accommodate construction traffic. | X    | X    | X    | X      | <p>The description of the route and the assessment as detailed within <b>Application Document ES 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> sets out all of the road links, junctions and PRow (including national walking and cycling routes) that may be subject to potential effects as a result of the Proposed Project. The construction vehicle routing has been designed to minimise impacts across the highway network (including the A1094, B1122, B1069 and B1119 for example), as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>. The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place. The proposed management and mitigation relating to PRow is set out within <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk</b> which is secured through</p> | N             |

| Ref. | Summary of issue                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Design change |
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|      |                                                                                               |      |      |      |        | Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| TT2  | Impact of construction traffic on the villages of Saxmundham, Leiston and Friston in Suffolk. | X    | X    | X    | X      | <p>Although the Proposed Project is located close to a number of towns/villages including Saxmundham, Leiston and Friston, only a small proportion of trips are expected to either originate from or pass through these settlements during the construction, operation and maintenance, and decommissioning phases. The routes to/from the proposed site accesses are illustrated by the HGV routing plan shown in <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b>. All construction vehicles will travel to/from the access points via the A12, with the majority of these then using the B1121 Main Road, or the A1094 and B1069 Snape Road. Additional routes with considerably fewer construction vehicle movements include the B1119 Church Street, the B1121 Aldeburgh Road and B1121 Saxmundham Road, Leiston Road, as well as Thorpe Road for access to the foreshore which will only be for light vehicles/ monitoring purposes only.</p> <p>For example, construction traffic travelling to/ from the B1119 and through Saxmundham will be limited to mobilisation works only, where there will be a limited number of construction vehicles (fewer than five HGVs per day). Once the access on the B1121 Main Road has been constructed, all construction vehicles will use the new access and routing through Saxmundham will no longer be required.</p> <p>In addition, the B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by abnormal vehicles under careful management. Otherwise, this route will not be used by HGVs to avoid construction traffic passing through Leiston and Coldfair Green and the Proposed Project is not therefore expected to have any impacts on this route.</p> | N             |

| Ref. | Summary of issue                                                                                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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|      |                                                                                                                                  |      |      |      |        | Further details of construction vehicle routing and the limitations of construction traffic vehicle movements on these parts of the network are set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> . Should any commitments be required to limit HGV movements on any specific parts of the highway network, then this will be reviewed with SCC Highways and set out within the Detailed CTMTP if necessary.                                                                                                                                                                                                                                                                |               |
| TT3  | Impact of the northern access route from Dorley's corner via Kelsale to Saxmundham.                                              | X    | X    | X    | X      | <p>Following feedback received during Statutory consultation and upon further evaluation, National Grid has selected a modified version of the proposed western access route for the Saxmundham converter station site. This was known as Option 3 at Statutory consultation.</p> <p>Selecting the western construction and maintenance access route means that National Grid has removed the alternative northern (option 2) and southern (option 1) access routes from its plans. As such, the northern access route no longer forms part of the proposals and no construction vehicles will travel along the B1121 Main Road in the vicinity of Dorley's Corner via Kelsale.</p>                                                            | N             |
| TT4  | Concerns over the cumulative impact of traffic from all the projects in Suffolk, particularly the proposed Sizewell development. | X    | X    | X    | X      | <p>It is acknowledged that Sea Link will be under construction alongside other schemes in the area. The assessment of inter-cumulative effects is considered within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b> based on <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List</b>, which includes more than 25 developments including Sizewell C Nuclear Power Station, East Anglia One North Offshore Windfarm, East Anglia Two Offshore Windfarm and LionLink. This includes assessment criteria relating to traffic and transport, as covered within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b>.</p> | N             |

| Ref. | Summary of issue                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
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|      |                                                                          |      |      |      |        | The cumulative assessment of Sizewell C includes a review and assessment of the main development site, the A12 Bypass, Yoxford roundabout, Sizewell link road, Northern Park and Ride, Southern Park and Ride and Sizewell C related rail improvements and rail extension route. In addition, <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> includes complimentary management measures, controls and monitoring information to those set out within the management plans for Sizewell C and East Anglia Projects where applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| TT5  | Impact on and loss of quiet lanes in Suffolk.                            | X    | X    |      | X      | <p>National Grid acknowledges the concerns regarding quiet lanes and the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>. National Grid considers sensitive receptors when drawing up the proposed construction access routes. For example, Grove Road (which is designated as a quiet lane) will only be used as a vehicle crossover between two proposed access points, to allow construction vehicles to continue along the haul road. Grove Road will not therefore be used by construction vehicles, other than when these are required to cross Grove Road (which will be managed).</p> <p>As above, the impacts will be temporary during the construction phase and mitigation measures will be put in place to minimise any potential impacts; see <b>Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk</b>.</p> | N             |
| TT6  | Impact of construction traffic on the villages of Minster and Cliffsend. | X    | X    |      | X      | The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> . National Grid has undertaken a complete and full assessment of traffic routes for construction. Details are contained in <b>Application</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |

| Ref. | Summary of issue                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Design change |
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|      |                                                                |      |      |      |        | <b>Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport.</b> The assessment demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network, including routes through Minster and Cliffsend.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| TT7  | Delay to emergency services during construction and operation. | X    | X    |      | X      | <p>During the development of the Proposed Project design, National Grid 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.</p> <p>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, and therefore the impact on EEAST resources is not a topic which has been scoped into the EIA.</p> <p>Nonetheless, the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> 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 the <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |



| Ref. | Summary of issue                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
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| TT8  | Query over whether rail transport was considered.                                                              |      |      |      | X      | <p>The potential to deliver construction materials by rail was investigated at the Scoping stage and although limited benefits were identified, this was not pursued as HGVs would be required to transport materials between railway sidings and the Order Limits in any case. Furthermore, the use of the railway line for freight could potentially impact rail passenger services on the main line and Sizewell-related services on the branch line. Therefore, the requirements of the Proposed Project are such that the only feasible method, resulting in least disruption, is to make use of the existing highway network during both the construction and operational phases. The proposed mitigation set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> includes measures designed to reduce the impact of the Proposed Project on the highway network. This Plan is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| TT9  | Query over policing of construction contractors to ensure they are following the adopted rules and procedures. | X    |      |      | X      | <p>Controls regarding construction traffic movements will be secured as part of <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>, which includes a section on monitoring and enforcement, to ensure contractors adhere to the measures outlined within the document. The proposed measures and controls within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> are set out as follows:</p> <ul style="list-style-type: none"> <li>• working hours restrictions (secured through Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>);</li> <li>• road condition surveys;</li> <li>• delivery management system;</li> </ul>                                                                                                                                                                                                                                                                                      | N             |

| Ref. | Summary of issue                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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|      |                                                                                                          |      |      |      |        | <ul style="list-style-type: none"> <li>• traffic management and monitoring;</li> <li>• defining HGV routes;</li> <li>• HGV timing restrictions;</li> <li>• banksmen and site management;</li> <li>• communication strategy;</li> <li>• appropriate site access arrangements;</li> <li>• necessary escort, permits and traffic management for AILs; and</li> <li>• measures to minimise/safely manage interactions with pedestrians and cyclists.</li> </ul> <p>In addition, <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> includes a section on community engagement and public information. A community relations team will be appointed to provide dedicated community relations and external communication support during construction. A free telephone helpline and website will be maintained. The community relations team will record the details of any complaints to allow these to be investigated and appropriately managed.</p> <p>These Plans are secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> |               |
| TT10 | Concerns over the use of B1153 for construction traffic, particularly in relation to HGVs as the road is |      | X    |      |        | The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> . The B1122 is proposed as an abnormal loads access only and is not proposed to be used as a main construction route to avoid routing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N             |

| Ref. | Summary of issue                                                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
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|      | not wide enough to allow HGVs to pass.<br><br>Concern over the use of the B1122 for construction traffic.                                                                            |      |      |      |        | construction traffic through Leiston and Coldfair Green. No construction vehicles are expected to travel along the B1353 as a result of the Proposed Project. The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place, including for the parts of the network identified (B1353 and B1122). The mitigation measures are contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> . Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . |               |
| TT11 | Concern that the traffic impact assessment is based on average traffic movements and not based on site-specific information and circumstances, such as holidays and cultural events. |      | X    |      |        | The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> is based on the peak construction phase and the busiest day of the construction programme in terms of total construction vehicle movements and is therefore robust. Furthermore, this includes an assessment of seven different time periods including the weekday network peak hours, the weekday development/ shoulder peak hours, the Saturday lunchtime peak, as well as 12-hour average weekday and 24-hour average day. The assessment does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place.                                                                                            | N             |
| TT12 | Concerns over the new permanent bell-mouth access onto the A256 in the location shown due to its close                                                                               |      | X    |      |        | National Grid has conducted additional consultation with Kent County Council and has prepared a Memorandum of Understanding (MoU) as part of this process. The MoU covers additional items relating to the A256 access and road safety audits for example.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |

| Ref.               | Summary of issue                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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|                    | proximity to Ebbsfleet Lane North. Issues with motorcyclists crossing the grassed verge from the A256 to gain access onto Ebbsfleet Lane North. Further details requested. |      |      |      |        | <p>In terms of the A256 access, the junction has been designed to be fully compliant with DMBR and a Stage 1 Road Safety Audit (RSA) has been carried out and shared with Kent County Council. A Designer's Response to the RSA Stage 1 has been produced outlining the changes made in response to the RSA's comments. The proposed design/ layout of the A256 access has been revised to consider any recommendations where necessary.</p> <p>In terms of vehicles potentially accessing Ebbsfleet Lane North from the A256 access, the new access shall have fencing and gates to prevent unauthorised access. There will be no connection to Ebbsfleet Lane North from the proposed access road other than the cycle/pedestrian crossing point. It is considered that the proposed design shall provide greater security than the existing arrangement in this area.</p>                                                                                                                                                                                                   |               |
| <b>Air quality</b> |                                                                                                                                                                            |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| AQ1                | Impact of increased dust and fumes during construction, including health impacts.                                                                                          | X    | X    | X    | X      | <p>National Grid acknowledges the potential for impacts on air quality during construction, particularly from dust generating activities. <b>Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality</b> and <b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality</b> provide an assessment of dust impacts using the accepted methodology within the Institute of Air Quality Management document Assessment of Dust from Demolition and Construction (2024) V2.2. The assessment also considers potential impacts from vehicles and Non-Road Mobile Machinery (NRMM). Measures relevant to the control and management of impacts during construction have been included within <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b>. <b>Application Document 7.5.6.1 Air Quality Management Plan – Suffolk</b> and <b>Application Document 7.5.6.2 Air Quality Management Plan – Kent</b> set out the mitigation measures required for the construction phase of the Proposed Project. They include proposed</p> | N             |

| Ref. | Summary of issue                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
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|      |                                                                      |      |      |      |        | air quality monitoring locations that will be in place for the construction phase of the project, which will be used to ensure mitigation measures are working effectively.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| AQ2  | Concerns over the use of greenhouse gases within Friston Substation. |      |      |      | X      | <p>A key aim of the Proposed Project is to provide the necessary upgrades to the transmission network to connect offshore wind, interconnectors and nuclear power. These technologies are vital for the achievement of net zero, with the project enabling reductions in greenhouse gas emissions through facilitating the delivery of these projects.</p> <p>A lifecycle greenhouse gas assessment is included in <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b>. This is an assessment of the greenhouse gas emissions (also known as 'carbon' for shorthand) associated with the Proposed Project over its whole life, including operational emissions and embodied carbon. This assessment considers the mitigation measures embedded in the Proposed Project to reduce greenhouse gas emissions, as well as puts forward additional mitigation measures where applicable. This assessment has been conducted in accordance with the Institute of Environmental Management and Assessment good practice guidance for greenhouse gas assessments in EIA.</p> <p><b>Application Document 7.5.13 Greenhouse Gas Reduction Strategy</b> has been developed alongside the climate change chapter. This document sets out how greenhouse gas emissions will be managed across the project life cycle.</p> | N             |
| AQ3  | The potential for construction phase air quality impacts on          | X    | X    |      | X      | The air quality impacts on ecology receptors are assessed within <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b> . The air quality assessment within both <b>Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality</b> and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |

| Ref.                       | Summary of issue                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Design change |
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|                            | sensitive habitats and plant communities.                                                       |      |      |      |        | <p><b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality</b> have considered ecological receptors.</p> <p>Measures relevant to the control and management of impacts during construction have been included within <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice. Application Document 7.5.6.1 Air Quality Management Plan – Suffolk</b> and <b>Application Document 7.5.6.2 Air Quality Management Plan – Kent</b>. These measures together will ensure no unacceptable construction phase air quality impacts on sensitive habitats and plant communities.</p>                                                              |               |
| AQ4                        | Request that National Grid commits to reducing emissions to air from Non Road Mobile Machinery. | X    |      |      |        | <p>National Grid has committed to measures to reduce air from Non Road machinery as requested. The following measures have been included in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> to reduce emissions to air from NRMM:</p> <p>AQ09 - Ensure all equipment complies with the appropriate Non-Road Mobile Machinery standards. Use stage 4 NRMM as a minimum and stage 5 where possible. Additionally, where possible, use alternative / renewable energy to power NRMM.</p> <p>AQ04 - ...Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable...</p> | N             |
| <b>Noise and vibration</b> |                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| NV1                        | Concerns over the impact of construction noise on residential properties close to the           | X    | X    | X    | X      | <p>An assessment of construction noise impacts has been undertaken as part of the ES, including consideration of any potential night-time works. The assessment indicates that with mitigation in the form of best practicable means, significant adverse effects from construction activities can be avoided at all nearby properties. Further detailed assessments will be conducted by the contractor and specific mitigation measures will</p>                                                                                                                                                                                                                                | N             |



| Ref. | Summary of issue                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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|      | landfall and cable route in Suffolk.                                                                |      |      |      |        | be identified and incorporated in the works. Further details are contained in <b>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration</b> .                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| NV2  | Impact of elevated noise levels during construction in Friston.                                     | X    | X    | X    | X      | An assessment of the potential impacts of the Friston Substation during construction is provided in <b>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration</b> . During the construction of the Substation, the EIA did not identify any significant adverse effects as a result of increased noise on nearby Noise Sensitive Receptors, including identifying no significant adverse effects at residential properties in the village of Friston.                                                                                                | N             |
| NV3  | Impact of elevated noise levels during construction on the independent special school at Ebbsfleet. |      |      |      | X      | The potential impacts of the Proposed Project on the school have been assessed in <b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration</b> . Under the assessment, the school was classified as a receptor of high sensitivity and prior to the adoption of any specific mitigation measures, the assessment concluded that there would be no significant impacts during construction. During construction Best Practicable Means will be applied to works in the vicinity of this receptor to reduce the potential effects of construction noise. | N             |
| NV4  | Impact of elevated noise levels on Benhall and Sternfield from HGV traffic.                         | X    |      |      | X      | Construction traffic noise has been assessed within <b>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration</b> .<br><br>An assessment of construction traffic noise impacts has been undertaken as part of the ES. The assessment indicates that construction traffic noise would not lead to significant adverse effects on noise sensitive receptors close to any proposed construction traffic route.<br><br>Construction traffic will not be routed through Sternfield.                                                                       | N             |

| Ref. | Summary of issue                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|------|-------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                       |      |      |      |        | Further information on the assessments is available in <b>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| NV5  | Impact of noise during operation of the Converter Station in Suffolk on local residents and wildlife. | X    | X    | X    | X      | <p>An indicative assessment of operational noise from the proposed Saxmundham Converter Station, based on current design information, is presented in <b>Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment.</b></p> <p><b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b> considers the impact of noise on wildlife. The Converter Station will not be a significant source of noise of a type to disturb wildlife, being comparable to that produced by other substations for which there is no evidence of wildlife disturbance.</p> <p>With standard embedded mitigation measures, the impact of operational noise from the proposed Saxmundham Converter Station on all nearby Noise Sensitive Receptors, has been assessed as having a small magnitude impact, during both daytime and night-time periods, taking account of context. This would result in a minor adverse effect at all nearby Noise Sensitive Receptors, which is considered to be not significant.</p> <p>The assessment is indicative for the purpose of demonstrating that significant adverse effects can be avoided. The assessment is based on early design information and standard noise mitigation measures. Further detailed design would be undertaken by the developers, including consideration of specific noise mitigation measures.</p> | N             |
| NV6  | Impact of noise during operation of the Friston Substation.                                           | X    | X    | X    | X      | In agreement with the Planning Inspectorate, the impact of the operation of switchgear was scoped out of the EIA. However, indicative assessments undertaken of operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |

| Ref. | Summary of issue                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|-----------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                   |      |      |      |        | has been conducted at the request of East Suffolk Council. The assessments indicate that operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines would not be significant.                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| NV7  | Impact of noise during operation of the converter station in Kent.                | X    | X    | X    | X      | <p>An indicative assessment of operational noise from the proposed Minster Converter Station, based on current design information, is presented in <b>Application Document 6.3.3.9.D ES Appendix 9.D Kent Operational Noise Assessment</b>.</p> <p>With standard embedded mitigation measures, the impact of operational noise from the proposed Kent Converter Station on all nearby Noise Sensitive Receptors, has been assessed as having a negligible magnitude during both daytime and night-time periods.</p> <p>This would result in a negligible effect at all nearby Noise Sensitive Receptors, which is considered to be not significant.</p> | N             |
| NV8  | Concerns over noise levels from the proposed overhead lines in Suffolk and Kent.  | X    | X    | X    | X      | At the Scoping stage of the Environmental Impact Assessment for the Proposed Project, potential noise impacts of the overhead line operation were scoped out of the EIA on the basis that the nearest noise sensitive receptor would be approximately 500 m away from the closest potential proposed overhead line. However, indicative assessments undertaken of operational noise from alterations to overhead lines has been conducted at the request of East Suffolk Council. The assessments indicate that operational noise from the alterations to overhead lines would not be significant.                                                      | N             |
| NV9  | Suggestions to provide screening of the converter stations and Friston Substation |      |      | X    | X      | During construction working areas will be fenced; the type of fencing will depend on the area to be fenced and the needs of fencing such as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |

| Ref.                                          | Summary of issue                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Design change |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                               | during construction in the form of barriers or planting to provide noise attenuation.                              |      |      |      |        | <p>providing acoustic of visual screening. Planting is not typically considered as an effective means of noise mitigation.</p> <p>Vegetation will be retained wherever practicable. Once constructed, native planting will be provided including woodland, hedgerows and tree planting; details can be found in <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b>.</p>                                                                                                                                             |               |
| <b>Socio-economic, recreation and tourism</b> |                                                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| SE1                                           | Impact of the Suffolk Onshore Scheme on tourism.                                                                   | X    | X    | X    | X      | A complete assessment of socio-economic effects has been undertaken including the impact on public rights of way. This is set out in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Tourism and Recreation</b> and concludes that there are no anticipated significant effects as a result of the Proposed Project.                                                                                                                                                                                                             | N             |
| SE2                                           | Impact of the Kent Onshore Scheme on tourism.                                                                      | X    | X    | X    | X      | A complete assessment of socio-economics effects has been undertaken. This is set out in <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b> . The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.                                                                                                                                                                                                                                                  | N             |
| SE3                                           | Concern over the loss of jobs in the tourism industry and requests to provide local people with job opportunities. | X    | X    | X    | X      | <p>A complete assessment of socio-economics effects has been undertaken. This is set out in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b>. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>This Chapter estimates around 30% of the construction staff will be sourced from the surrounding area, based on benchmarks against similar energy infrastructure schemes, thereby providing local people with job opportunities.</p> | N             |

| Ref. | Summary of issue                                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------|-------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| SE4  | Impact on local house prices (Suffolk and Kent).                                                                  |      |      | X    | X      | <p>A complete assessment of socio-economics effects has been undertaken. This is set out in <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>All affected landowners will be compensated on a fair and reasonable basis for any rights acquired, and any impacts on retained property will be considered in line with the Compulsory Purchase Compensation Code. Compensation claims for other disturbance are considered on a case-by-case basis if there is evidence of negative impacts as a result of the Proposed Project.</p> | N             |
| SE5  | Concern that the economic benefits to the local community will be transient and there will be no lasting benefit. |      |      | X    | X      | <p>National Grid supports the delivery of community benefits associated with transmission infrastructure and already has a number of established programmes which deliver this.</p> <p>National Grid is waiting for the Government's position on the provision of community benefits associated with transmission infrastructure. This will determine its future approach.</p>                                                                                                                                                                                                                                                                                                                              | N             |
| SE6  | Concerns over the demands placed on local services in Suffolk during the construction phase.                      |      |      |      | X      | <p>Potential impacts on the local services are assessed in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b>. This analysis demonstrates that at peak workforce employment and typical seasonal occupancy levels, all of Suffolk Onshore Scheme's construction workers could be accommodated within a 60-minute drive time of the Order Limits.</p> <p>Given this, it is assessed that there would be negligible magnitude of impact on the hotel, bed and breakfast, and inns accommodation sector arising from the Suffolk Onshore Scheme. It is anticipated that accommodation providers would be able to accommodate employees</p>                 | N             |

| Ref.                        | Summary of issue                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
|-----------------------------|-----------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                             |                                                                                               |      |      |      |        | working at the Suffolk Onshore Scheme without any adverse effects on the sector.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| SE7                         | Concern that there will be insufficient accommodation space for construction workers.         | X    |      |      |        | Assessment of accommodation needs for construction workers has been undertaken within the ES. The assessment concluded that accommodation providers would be able to accommodate employees without any adverse effects on existing accommodation needs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |
| <b>Health and wellbeing</b> |                                                                                               |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| HW1                         | Concern over any health or medical issues that may arise as a result of the Proposed Project. | X    | X    | X    | X      | <p>The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, National Grid has carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts.</p> <p>A complete assessment of health and wellbeing effects has been undertaken. This is set out in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing and Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing</b>. These conclude that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>With regard to electromagnetic fields (EMFs), the UK has a carefully thought-out set of policies for protecting the general public against EMFs, the main component of which is exposure guidelines. These exposure guidelines are set by independent scientific bodies and are based on decades-long studies into the effects if EMFs and ill health. After those decades of research, the weight of evidence is against there being any health risks of EMFs below the guideline limits. It is National Grid's policy to ensure that all of its equipment comply fully with these exposure limits.</p> | N             |



| Ref. | Summary of issue                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
|------|-----------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                 |      |      |      |        | Further information can be found in <b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| HW2  | Impact on the freedom of movement in the Proposed Project area. |      |      |      | X      | <p>Outline PRoW Management Plans have been prepared for both Suffolk and Kent as part of the DCO application. These have been developed in consultation with the relevant local planning authorities and provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. See <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk</b> and <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>.</p> <p>The majority of interactions with PRoW are short term in nature for a temporary period during construction. The proposed management measures in the Management Plans above seek to retain access to PRoW during all phases of the Proposed Project, with temporary diversions only being proposed where these are required to bypass any temporary closures during the construction phase where necessary.</p> <p>No PRoW will be permanently diverted as a result of the Kent Onshore Scheme.</p> <p>Two PRoW are proposed to be permanently stopped up as a result of the Suffolk Onshore Scheme which comprise PRoW E-354/006/0 due to the location of the Friston Substation and PRoW E-491/005/0 due to the location of the Saxmundham Converter Station. Permanent diversions would be implemented for these routes retaining freedom of movement.</p> <p>The proposed diversion routes will be put in place prior to the stopping up of these PRoW so that PRoW users are able to continue their journey. These will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. The proposed diversion</p> | N             |

| Ref. | Summary of issue                                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                    |      |      |      |        | routes will be set out in the final Public Rights of Way Management Plans, which are subject to approval of Suffolk County Council.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| HW3  | Concern over the mental well-being of those in close proximity to the Proposed Project and those not having the same access to public open spaces. | X    | X    | X    | X      | <p>National Grid recognise that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. Throughout the development phase of the Proposed Project, National Grid have therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, National Grid have sought to provide certainty on the plans wherever possible.</p> <p>There will be some temporary disruption to the area during construction, but as the works in the Pegwell Bay area will be conducted using trenchless solutions, there will be no long term impacts on access for the public.</p> <p>Only two PRoW will be permanently closed and both would have permanent diversions in place prior to their closure ensuring access to PRoW is retained.</p> <p>A Construction Code of Practice will help control and manage aspects of the development scheme that could affect health and wellbeing (<b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| HW4  | Requests for details on the gas to be used                                                                                                         |      |      |      | X      | The gas to be used in the gas insulated switchgear has not yet been confirmed, but for avoidance of doubt, National Grid can confirm that the switchgear will not utilise SF6 gas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N             |

| Ref. | Summary of issue                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | for health and safety reasons.                                   |      |      |      |        | The health and safety of the public, local communities and employees is central to everything that National Grid does, and this applies to this element of the project as all others.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| HW5  | Concerns over the health effects of the proposed overhead lines. | X    | X    | X    | X      | <p>The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, National Grid have carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts.</p> <p>With regard to electric and magnetic fields (EMFs), the UK has a carefully thought-out set of policies for protecting the general public against EMFs, the main component of which is exposure guidelines. These exposure guidelines are set by independent scientific bodies and are based on decades-long studies into the effects if EMFs and ill health. After those decades of research, the weight of evidence is against there being any health risks of EMFs below the guideline limits. It is National Grid's policy to ensure that all of its equipment comply fully with these exposure limits.</p> <p>The proposed overhead lines have been designed to ensure they are fully compliant with guidelines and policies. This ensures that health concerns are properly and adequately addressed. Where possible the required cabling has been placed underground.</p> <p>Further information can be found in <b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b>.</p> | N             |

## Onshore Route Location

| Ref.                                    | Summary of issue                                                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Design change |
|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| ORL1                                    | Concerns over the impact of the construction of the HVDC cable on properties along Leiston Road near the Aldeburgh Golf Club. |      |      | X    | X      | Following feedback received at Statutory consultation, National Grid adjusted the route of the HVDC cable and moved it further away from two properties on Leiston Road.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Y             |
| <b>Inter-project cumulative effects</b> |                                                                                                                               |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| IP1                                     | Significant concerns regarding the impact of multiple energy projects within Suffolk on similar timescales.                   | X    | X    | X    | X      | <p>National Grid has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement.</p> <p>National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities (see <b>Application Document 7.10 Coordination Document</b>).</p> <p>The cumulative effects of the Proposed Project together with other projects in the area is assessed in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b>.</p> <p><b>Application Document 6.3.2.13.A ES Appendix 2.13.A Descriptions of Other Developments</b> contains information regarding other likely project timescales, although the cumulative assessment has used a worst case, i.e. that the major energy projects could all be under construction simultaneously. Further details are outlined within <b>Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies</b>.</p> | N             |

| Ref. | Summary of issue                                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|---------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                               |      |      |      |        | Whilst National Grid acknowledges the number of projects in the area, the team have worked with other developers to reduce the impact of projects on communities and the environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| IP2  | Request for a complete and honest review of all the proposed energy projects in Suffolk.                      | X    | X    | X    | X      | <p>National Grid has endeavoured to show information on other projects where possible. As part of the Statutory consultation, the Project Overview Document produced for the Statutory consultation included a map which included the Draft Order Limits for the Proposed Project alongside committed and planned developments in Suffolk. These other developments included Sizewell C, East Anglia ONE North, East Anglia TWO, LionLink and Nautilus. The interactive map on the Proposed Project website during the Statutory consultation also included a number of layers showing the location of other infrastructure projects in Suffolk. National Grid did not include these developments on all of its plans as it would have made the plans more difficult to understand.</p> <p>Additionally, the cumulative effects of the Proposed Project and the other projects planned in Suffolk is considered in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b>.</p> | N             |
| IP3  | Concerns regarding the impact of the Kent Onshore Scheme together with already approved projects in the area. | X    | X    | X    | X      | National Grid acknowledges that the Proposed Project, together with other planned projects in the area, may have cumulative impacts and as such has undertaken a complete assessment of potential cumulative impacts in <b>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N             |
| IP4  | Concerns that the programmes for the SPR East Anglia ONE North and East Anglia TWO projects and the           | X    | X    |      | X      | <b>Application Document 6.3.2.14.A ES Appendix 2.14.A Descriptions of Other Developments</b> contains updated information regarding other project timescales which have been used in the updated cumulative impact assessment in the ES. East Anglia ONE North and East Anglia                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |

| Ref. | Summary of issue                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------|-----------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | data collected have not been correctly represented in the assessment. |      |      |      |        | <p>TWO construction is expected to commence in 2024/2025 and energisation to commence in 2027 (Scottish Power Renewables, 2024).</p> <p>Relevant information submitted within the East Anglia ONE North and East Anglia TWO DCO examinations has been reviewed and has informed the production of the ES where relevant. This has included the review and adoption of several of the representative viewpoint locations to inform the assessment on visual amenity of the Suffolk Onshore Scheme. This is shown on <b>Application Document 6.4.2.1 Landscape and Visual</b>. Outline landscape mitigation which is shown on <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk</b> has been prepared with reference to the East Anglian ONE North and TWO landscape plans. Impacts on the setting of heritage assets have also been assessed and are detailed in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>. This included a review of the East Anglia ONE North and TWO assessments and viewpoints considered as part of their assessment.</p> |               |

## Physical environment

|     |                                                                   |   |  |  |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |   |
|-----|-------------------------------------------------------------------|---|--|--|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| PE1 | Possibility of beach erosion due to construction of the landfall. | X |  |  | X | <p>A detailed assessment of the impact on the coastline and beaches is provided in <b>Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment</b>.</p> <p>The Kent landfall site is assessed to have low sensitivity to erosion due to its sheltered setting within Pegwell Bay and historically stable beach levels.</p> <p>The sensitivity of the Suffolk landfall coastline is considered to be of high sensitivity reflecting its environmentally designated status and the fact that erosion and beach lowering is already taking place at the landfall site.</p> | N |
|-----|-------------------------------------------------------------------|---|--|--|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|



| Ref. | Summary of issue                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                           |      |      |      |        | <p>The rock bags/concrete mattresses prior to cable pull in are temporary measures and it is assumed that they will be installed with as low a profile as possible, minimising the obstruction to wave and tidal processes to minimize the impact on the coastline. Any rock protection required post installation will be buried at the same location as previous temporary protection and will not protrude from the seafloor. Further, both coastlines are naturally dynamic settings that are considered to have some capacity to recover from any localised (intertidal) morphological changes associated with the introduction of rock bags/concrete mattresses. Therefore, at both landfalls, the magnitude of the impact is likely to be small. This will result in a minor effect that is not significant.</p>                                                                                                                                                                                                                                                                               |               |
| PE2  | Concern over the impact on the Coralline Crag which is stated to protect Aldeburgh and the potential for coastal erosion. | X    | X    |      | X      | <p>The Coralline Crag formation is considered within <b>Application Document 6.2.4.1 Part 4 Chapter 1 Physical Environment</b>.</p> <p>The cable corridor route passes over a small section of the Crag, therefore, the potential impacts associated with suspended sediment deposition onto the Crag, cable installation burial and rock armouring are assessed in this Chapter. The assessment draws information from a Landfall Sediment Modelling Assessment that was undertaken at Aldeburgh.</p> <p>Furthermore, the potential for permanent damage to the Crag occurring and having a knock-on impact on sediment transport in the region and potentially altering coastal geomorphology is also assessed.</p> <p>The magnitude of the impact as a result of the installation of the cable is small due to the relatively small area that may be impacted compared to the large extent of the Coralline Crag outcrop. Within <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> it is noted that the Coralline Crag shoal/outcrop is in</p> |               |

| Ref. | Summary of issue                                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                      |      |      |      |        | close proximity to the west of the break-out point and recommends installation should not create pre-cut trenches at the Coralline Crag due to the sensitivity of the system. Instead, concrete mattresses should be used to protect the cable. Accounting for the measures proposed to protect the Coralline Crag Ridges, there would be a minor effect, which is not significant.                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| PE3  | Concerns over the impact on the geological structures in Pegwell Bay.                                                                                                | X    |      |      | X      | <p>Potential impacts on the geomorphology of Pegwell Bay are considered in <b>Application Document 6.2.4.1 Part 4 Chapter 1 Physical Processes</b>.</p> <p>The assessment concludes that there are not predicted to be any significant adverse effects on the geological structures at Pegwell Bay as a result of the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |
| PE4  | Query regarding the surveys that have been undertaken to ensure the Proposed Project will not damage any shipwrecks, sunken submarines or crashed military aircraft. | X    | X    |      | X      | <p>Potential impacts on maritime and aviation archaeology were assessed in <b>Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology</b>.</p> <p>The assessment was conducted by means of accessing any records of sites, findspots, wrecks, casualties and other seabed features from reliable datasets and understanding this resource further through the assessment of available marine geophysical survey data along with discovering new sites and features (<b>Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report, Annex 6.7 and 6.8</b>). As well as summarising the known archaeological resource, the baseline assessment also underlines the potential for encountering unknown shipwreck and aircraft crash sites within the study area.</p> | N             |
| PE5  | Potential for saline intrusion due to                                                                                                                                |      |      |      | X      | <b>Application Document 6.3.2.5.B ES Appendix 2.5.B Groundwater Risk Assessment</b> includes an assessment on the potential for saline intrusion to occur at the landfall location. The assessment concluded that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N             |

| Ref.                   | Summary of issue                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
|------------------------|------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                        | construction of the underground cabling.                                                                   |      |      |      |        | there is a low risk of significant saline intrusion caused by the Proposed Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| <b>Benthic ecology</b> |                                                                                                            |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| BE1                    | Impact on the Goodwin Sands MCZ which supports priority habitat and important species.                     | X    | X    |      | X      | Since the production of the PEIR and Statutory consultation, the Offshore Scheme has been re-routed to avoid the Goodwin Sands MCZ. This will avoid direct impacts and reduce the impacts to the known and potential benthic receptors located within the area including <i>Sabellaria spinulosa</i> and <i>Mytilus edulis</i> . Information can be found in <b>Application Document 6.11 Marine Conservation Zone Assessment</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Y             |
| BE2                    | Concern over the extent of damage to marine benthic habitats as a result of the marine cable construction. | X    | X    |      | X      | <p>Depending on the location of the cable, between 10-20 m of seabed would be cleared. Drop Down Video or Remotely Operated Vehicle mounted cameras may be used to confirm the locations and extents of sensitive benthic habitats or features. This would inform micro-routeing of submarine cable systems to avoid or minimise interactions with these features in so far as practicable.</p> <p>A total area of 0.15 km<sup>2</sup> of permanent loss of habitat is expected due to cable protection. Many of the habitats comprise subtidal muds and mixed sediments, which are widespread and of low value.</p> <p>Since the production of the PEIR and Statutory consultation, the Offshore Scheme has been re-routed to avoid the Goodwin Sands MCZ.</p> <p>The Offshore Scheme is designed for a lifespan of approximately 40-60 years. The cable system installation is designed such that a regular maintenance regime is not required to maintain the integrity of the link.</p> <p>The impacts on benthic ecology are presented in <b>Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology</b>.</p> | N             |

| Ref.                              | Summary of issue                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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| <b>Fish and shellfish ecology</b> |                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| FS1                               | Concern over the impact on fish due to construction of the marine cable.                        | X    | X    |      | X      | The potential impact of the Proposed Project on fish is assessed in <b>Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology</b> . There are no significant impacts on fish predicted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |
| FS2                               | Concern that the construction method for the marine cable will cause damage to benthic ecology. | X    | X    |      | X      | <p>The potential impact of the Proposed Project on benthic ecology is assessed in <b>Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology</b>. There are no significant impacts predicted on benthic ecology.</p> <p><b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> provides a detailed overview of the cable installation techniques for the Proposed Project.</p> <p>The primary method of cable installation for the Offshore Scheme is burial to a target depth of 1-2.5 m to avoid impacts to other sea users and existing hydromorphology.</p> <p>The following cable laying methodologies may be used:</p> <ul style="list-style-type: none"> <li>• simultaneous cable lay and trenching/burial (SLB); and</li> <li>• surface cable lay followed by post lay trenching of cables/burial (PLB).</li> </ul> <p>SLB is becoming more widespread as installation contractors design and build their own ploughs. It has the advantage of providing immediate protection to the cable but requires the cable lay vessel (CLV) to be longer on site due to the slower speed compared to surface laying. This may become an issue in areas where weather patterns are unpredictable. It does however reduce the overall duration of lay and</p> | N             |

| Ref.           | Summary of issue                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|                |                                     |      |      |      |        | <p>protection works. SLB is not being encouraged for the Proposed Project due to the nature of the seabed conditions found along the route.</p> <p>PLB separates the lay and protection activities, enabling the CLV to lay quickly and then move onto other operations whilst a separate spread undertakes the burial activities. This also has advantages in that a wider range of burial tools may be considered, depending on the nature of the seabed. Rate of progress for PLB is approximately 10 km - 12 km per day. Rates depend on seabed sediments and required depths of lowering. For the Proposed Project, the majority of the route is London Clay so rates would be lower than for sands and less cohesive materials.</p>                                                                                                                                                                                                                                                                                           |               |
| Marine mammals |                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| MM1            | Impact on seals within Pegwell Bay. | X    | X    |      | X      | <p>National Grid acknowledges the importance of Pegwell Bay to wildlife.</p> <p>Project-specific monthly surveys were also undertaken in the period September to November 2024 with the primary aim of determining the specific haul-out locations of the Pegwell Bay seals (<b>Application Document 6.4.4.4.A Pegwell Bay Seal Survey Report</b>). During all three surveys hauled out seals were only found in a relatively restricted area of the lower River Stour moving between the sandbanks in the river channel at low tide and up to the top of the riverbank, to rest on the saltmarsh.</p> <p>The haul out locations are over 1km away from works in Pegwell Bay, including the exit pit for the trenchless installation from the onshore. At low tide seals are out of direct line of sight of Pegwell Bay as they haul-out on the low tide river bank. Impacts on seals are reported in <b>Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals</b>. No significant adverse effects are predicted.</p> | N             |
| Ornithology    |                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |

| Ref. | Summary of issue                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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| OR1  | Impact of the Suffolk and Kent Onshore Schemes on migrating bird species of international importance. | X    | X    | X    | X      | <p>National Grid recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity, Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology and Application Document 6.6 Habitats Regulations Assessment Report</b>, which consider the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway.</p> <p>The assessments conclude that whilst there would be some significant adverse effects on ornithology in the short-medium term, the creation of habitats as part of the project would lead to a significant beneficial effect on ornithology, in the long term.</p> | Y             |
| OR2  | Impact on the North Warren Nature Reserve, Leiston-Aldeburgh SSSI and the Sandlings SPA.              | X    | X    | X    | X      | <p>Impacts from construction of the onshore cable on the RSPB Reserve, Leiston-Aldeburgh SSSI and Sandlings SPA have all been considered in the design, construction methods and programme for the Proposed Project. This assessment has been discussed with Natural England, Suffolk Council and East Suffolk Council. The outcome of the assessment identified areas where mitigation was required.</p> <p>Significant disturbance is to be avoided by a combination of construction methods (adopting a trenchless construction solution rather than open</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Y             |



| Ref. | Summary of issue                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
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|      |                                           |      |      |      |        | cut trenching), technical mitigation (noise reduction measures), moving the construction compound further from the SPA than it was identified at Statutory consultation, and phasing the most potentially disturbing elements of work in that area to avoid the bird nesting season.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |               |
| OR3  | Impact on the red-throated diver in Kent. | X    | X    |      | X      | <p>The red-throated diver has been the subject of a separate assessment within <b>Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology</b>. A specific protocol has been developed for this species of bird (<b>Application Document 7.8 Red Throated Diver Protocol</b>) which is secured through Requirement 5 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>Furthermore, in discussion with Natural England, and based on their most recent advice for the red-throated diver, National Grid has committed to a seasonal restriction (01 November – 31 March) for offshore cable burial activities in the Outer Thames Estuary SPA and a seasonal restriction (01 January – 31 March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. The assessment presented in the ES submitted with the DCO application reflects this seasonal restriction, which is included in the Red Throated Diver Protocol secured by Requirement 5.</p> | N             |
| OR4  | Impact on the golden plover in Kent.      | X    | X    |      | X      | <p>Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at</p>                                                                                                                                                                                                                                                                                   | Y             |

| Ref. | Summary of issue                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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|      |                                                                                                            |      |      |      |        | <p>Targeted consultation. This commitment is contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> which is secured through <b>Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order</b>.</p> <p>The mitigation measures incorporated into the application, including the delivery of 10ha of off-site arable enhancement primarily for golden plover in the Thanet Coast and Sandwich Bay SPA/ Ramsar. This habitat enhancement would mean that the residual effects on the SPA would be negligible and would also lead to a moderate beneficial impact in the long-term on a receptor of up to District (for nesting birds) and Regional (for non-breeding birds) due to habitat creation. This is a long-term moderate beneficial effect which is significant.</p> |               |
| OR5  | Concerns that the Proposed Project will have impacts similar to those of the recently installed Nemo Link. | X    | X    | X    | X      | <p>The Nemo Link project was a joint venture, continental interconnector in partnership with Belgian Elia. The Proposed Project is a piece of domestic transmission infrastructure owned by National Grid.</p> <p>National Grid is committed to a trenchless solution beneath the sensitive saltmarsh habitat at Pegwell Bay (unlike Nemo Link) and the option of a trenched installation is not included in the application. The commitment to a trenchless solution is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>. This will reduce the impacts of the Proposed Project in comparison to Nemo Link.</p>                                                                                                                                                                                               | N             |
| OR6  | Impact on birds from the proposed overhead lines.                                                          | X    | X    | X    | X      | National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to <b>Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey</b> and the surveys are reported in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |

| Ref.                      | Summary of issue                                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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|                           |                                                                                                                 |      |      |      |        | <p><b>Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report.</b></p> <p>The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. The potential impacts on birds in Kent is presented in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity</b>. Mitigation measures are detailed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> |               |
| OR7                       | Request to show bird distribution in Kent on maps.                                                              |      |      |      | X      | <p>The application for development consent is accompanied by an ES which will contain the full non-breeding bird reports undertaken in 2022-23 and 2023-24 and the breeding bird reports undertaken in 2023 and 2024. These surveys cover Pegwell Bay and include maps showing distribution of birds recorded. The bird survey reports for Kent are <b>Application Documents 6.3.3.2 B to G</b>.</p>                                                                                                                                                                                                                                                                                                                                   | N             |
| <b>Marine archaeology</b> |                                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| MA1                       | Concern over the impact on maritime heritage from the marine cable and landfall sites in both Suffolk and Kent. | X    | X    |      | X      | <p>As part of the ES that accompanies the DCO application, National Grid has undertaken an assessment of the potential impacts on marine archaeology to include physical disturbance activities causing direct damage and/or loss of heritage receptors on and below the seabed, and physical disturbance activities causing changes to hydrodynamic and sedimentary regimes leading to sediment reduction on the seabed and scour, causing adverse indirect effects on seabed heritage receptors. Furthermore, the assessment has considered works that would affect the setting of known heritage receptors and the character of the historic</p>                                                                                    | N             |

| Ref. | Summary of issue                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|      |                                                                                         |      |      |      |        | <p>seascape. These assessments have been undertaken using archaeological specialists in line with recognised good practice guidance documents.</p> <p>The results of the assessment are found in <b>Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology</b>.</p> <p>A number of sources of primary and synthesised information were consulted for the assessment which are contained in <b>Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report</b>.</p> <p>The assessment did not identify any potential significant adverse effects of the Proposed Project on marine archaeology.</p>                                                                                                                                                                                                                                                                                                                                                                     |               |
| MA2  | Requests for clarification on what surveys have been undertaken for marine archaeology. | X    |      |      | X      | <p>Sidescan sonar, Multibeam Echo Sounder, magnetometer and sub-bottom profiler surveys were undertaken by MMT in 2021. See PEIR report Appendix 4.7.A pages 15 - 18 for the technical specifications and pages 42 - 52 for the results and Figure 4.7.A.1 for the extent of the marine geophysical survey area extending into Pegwell Bay.</p> <p>Additional survey data obtained in 2024 included sidescan sonar, Multibeam Echo Sounder, magnetometer and sub-bottom profiler surveys undertaken by Next Geo and a gradiometer survey of Pegwell Bay obtained by SEP Hydrographic. The results of the archaeological assessment of this data and a figure showing the extent of the marine geophysical survey area will be presented within the DCO application.</p> <p>Wessex Archaeology conducted the archaeological assessment of all the marine geophysical data.</p> <p>Two geotechnical surveys have been undertaken: MMT obtained 69 vibrocores in 2021 and Next Geo obtained 20 vibrocores in 2024.</p> | N             |

| Ref.                           | Summary of issue                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
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|                                |                                                                                              |      |      |      |        | <p>Wessex Archaeology conducted the geoarchaeological assessment of all the vibrocores.</p> <p>Archaeological walkover surveys were undertaken at the landfalls by archaeologists from Wessex Archaeology in September 2023 for the Suffolk landfall and in June 2023 for the Kent landfall. The Kent landfall was surveyed again in August 2024 following the widening of the Order Limits.</p> <p>National Grid is planning a UXO survey in 2026 within the Order Limits.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| <b>Shipping and navigation</b> |                                                                                              |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| SN1                            | Concerns over the impact of the construction of the marine cable on existing marine traffic. | X    | X    |      | X      | <p>As part of the Proposed Project EIA, National Grid undertook an assessment of the potential impacts on shipping and navigation, <b>Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation</b>. The Proposed Project currently routes south of the Sunk Deep Water Anchorage and north of the Sunk W1 Buoy in order to be further from the Sunk Pilot Station in accordance with requirements of the Harwich Haven Authority.</p> <p>The assessment recommended the establishment of communication plans with clear protocols to ensure effective communication and coordination between all relevant shipping and navigation stakeholders.</p> <p>During construction and operation, National Grid will develop a well-coordinated communication strategy, and proactive planning of operations, to ensure safe and efficient operations with minimal disruption to shipping and navigation A Navigation Installation Plan will be produced post-DCO application submission in order to provide a mechanism to achieve this.</p> | N             |

| Ref. | Summary of issue                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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| SN2  | Query as to how inspection and maintenance of the marine cable will be undertaken.          |      |      |      | X      | <p>The cable system installation is designed such that a regular maintenance regime is not required to maintain the integrity of the cable. However, monitoring may indicate that localised lengths along the cable may require maintenance. Cable repairs may be required at any time but are expected to be rare.</p> <p>During the operational lifetime of the cable a number of inspections to examine integrity are foreseen. This is expected to take place annually via ROV/autonomous operated underwater vehicle in the early stages of the operation moving to every 2 – 5 years once suitable functional/operational stability is established.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |
| SN3  | Concern over the impact of pipeline crossings on the River Stour with regard to navigation. | X    | X    | X    | X      | <p>The Proposed Project is not proposing a pipeline crossing on the River Stour. Further details of the Proposed Project are contained within <b>Application Document 6.2.1.4 ES Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. A temporary bridge structure will span across the River Stour for the duration of the construction period. The public right of navigation along the River Stour will be temporarily stopped-up/closed for one to five days whilst the bridge is lifted into place and secured. The bridge will be designed so that once in place the river remains navigable. Sensitivity of open space receptors is assessed to be high, due to their local importance and limited alternatives available for substitution in the local area. The Proposed Project will require a short-term stop-up/closure of river navigation. However, when considering the stop up/closure in the context of the duration of the construction period, the magnitude of impact will be negligible. Overall, this results in a temporary negligible effect, which is not considered to be significant. Further information is contained within <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>.</p> | N             |



| Ref. | Summary of issue                                                                                                                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| SN4  | Suggestion that no cable joints should be in the Sunk area to protect existing shipping movements.                                                               | X    |      |      |        | <p>This suggestion has been factored into routing and noted in <b>Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation and Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment</b>.</p> <p>The change in routing was consulted on at Targeted consultation after discussions with Harwich Haven. The number of campaigns is currently projected to be 2, each of c. 60 km. The jointing point of the cables will aim as far as practicable to be outside the SUNK area and the higher risk area to the cables in this heavily trafficked portion of the route. If a single lay campaign is proposed by the Installation Contractor, there will be no need for a joint (only if the cable is accidentally damaged or suffers a technical failure within the SUNK area (i.e. post installation campaign) will a repair joint will be required).</p> | Y             |
| SN5  | Requirement for cable installation (and associated works) to be north of both the Storm Buoy and the W1 buoy, and south of the charted Sunk deepwater anchorage. | X    |      |      |        | <p>Through discussion with Harwich Haven Harbour Authority, the route has been refined to route north of the Sunk W1 buoy. This is discussed in <b>Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation (Application Document 6.2.4.7) and Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment</b>.</p> <p>Concerns over proximity to the charted Sunk deepwater anchorage are noted. This is a matter that be discussed further and be addressed in the Statement of Common Ground. While routing is currently highlighted in the comment, the route does not enter the Sunk Deepwater Anchorage. At DF3 (consulted on in Targeted consultation), the route of the corridor is in compliance with the HHA limits as described.</p>                                                                                                               | Y             |

## Commercial fisheries

| Ref. | Summary of issue                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| CF1  | Concern over the impact of the construction of the marine cable on the fishing industry.                                  | X    | X    |      | X      | <p>The permanent loss of fishing grounds for all fisheries, including trawlers, has been considered and updated in <b>Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries</b>. Following mitigation, the impact has been deemed to have minor significance.</p> <p><b>Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries</b> concludes there to be potential for moderate effects (significant) on static gear fisheries during the construction, operation and decommissioning phases, relating to the Proposed Project. Additional mitigation has therefore been included to reduce this potential impact and ensure early and regular consultation with fishers are upheld, with the aim of ensuring the fishing communities' views are heard in a timely manner, allowing the development to take an informed approach moving forward.</p>                                                                                                                                                                                                                                             | N             |
| CF2  | Query regarding whether there will be no trawling areas over the marine cable and how it will be protected from trawling. |      |      |      | X      | <p>National Grid discourages fishing over its assets due to the potential risks to vessel operators and to the cables, which are of critical national importance and if damaged could result in implications for the UK transmission system and security of supply. As such, it advises that vessel operators follow the longstanding maritime guidance regarding the avoidance of demersal trawling (and anchoring) in the vicinity of subsea cables. Specifically, this guidance includes the Mariner's Handbook (P100) 12th Edition (UKHO, 2020), all Admiralty charts, and the recent Marine Guidance Note (MGN) 661 published by the Maritime and Coastguard Agency (MCA).</p> <p>National Grid do, however, recognise that that some fishing may still occur over its subsea cable assets, either inadvertently or at the discretion of individual vessel operators, acknowledging that there is not a statutory exclusion zone. As such, the subsea cables will be suitably designed and protected to reduce the risk of them being damaged by fishing activity as far as is practicable. In the first instance this will be</p> | N             |

| Ref.                                    | Summary of issue                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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|                                         |                                                                         |      |      |      |        | <p>through burial, then through external protection where necessary. Where external protection is used, this will be designed in accordance with best-practice and industry guidance to minimise snagging risks in so far as practicable.</p> <p>As built surveys of the cables will also be conducted, and their positions (including locations of external protection) will be reported to the UKHO and Kingfisher for inclusion on Admiralty and KIS-ORCA charts. These details will also be shared with relevant fisheries stakeholders.</p> <p>There will be temporary loss of fishing grounds during survey work and installation activities, as such they work with the fishing industry to put in place management measures to mitigate this disruption.</p>                                                             |               |
| Climate change                          |                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| CC1                                     | Concerns about the impacts on the Proposed Project from climate change. | X    | X    | X    | X      | <p>A climate change risk assessment is included within <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b>. This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in Environmental Impact Assessments.</p> <p>A separate, more detailed flood risk assessment has been conducted within <b>Application Document 6.8 Flood Risk Assessment</b>. The flood risk assessment involves detailed modelling and assessment, and accounts for the impacts of climate change on flooding.</p> <p>The project has been designed taking into account future climate change and is designed to be as resilient as possible to its effects.</p> | N             |
| Combined effect of the Proposed Project |                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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| CE1  | Concerns over the range of impacts the Suffolk Onshore Scheme would have such as disruption to local residents in tranquil residential areas, impact on local roads, impact on local tourism, impact on dark skies and internationally important wildlife habitats such as RSPB reserves, AONBs and SSSIs. | X    | X    | X    | X      | <p>National Grid acknowledges that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Environmental Statement has been prepared as part of the DCO submission. The Environmental Statement summarises the findings of the Environmental Impact Assessment to inform decision-makers (in this case the SoS) about the environmental implications of the Proposed Project.</p> <p>An intra-project cumulative effects assessment has been carried out for the Proposed Project. This assessment considers the potential for multiple impacts to act on single receptors, such as local residents or designated sites For the Suffolk Onshore Scheme, the full assessment is available within <b>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects</b>.</p> | N             |
| CE2  | The combined impact of the Kent Onshore Scheme on terrestrial ecology, agricultural land, noise and air impacts, impacts on local roads, potential for increasing flooding and landscape and visual impacts, among others.                                                                                 | X    | X    | X    | X      | <p>National Grid acknowledge the fact that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Environmental Statement has been prepared as part of the DCO submission. The Environmental Statement summarises the findings of the Environmental Impact Assessment to inform decision-makers (in this case the SoS) about the environmental implications of the Proposed Project.</p> <p>A full intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within <b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Intra-Project Cumulative Effects</b>.</p>                                                                                                                                        | N             |

## Alternative solutions

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
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| AS1  | <p>Request to look at alternative solutions to the Proposed Project in both Suffolk and Kent. Alternatives suggested were:</p> <ul style="list-style-type: none"> <li>• Use brownfield sites (Sizewell, Bradwell, Isle of Grain, Kingsnorth, Richborough, Margate, Cliftonville, Dungeness, Manston airport, Tilbury);</li> <li>• Develop a fully integrated grid offshore;</li> <li>• Take the power directly to Kent; and</li> <li>• Take the power to where needed (London/South East).</li> </ul> | X    | X    | X    | X      | <p>In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. This includes all the alternative sites suggested.</p> <p>The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. The need case for the Proposed Project has identified that connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide.</p> <p>National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.</p> <p>It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.</p> | N             |

| Ref. | Summary of issue | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Design change |
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|      |                  |      |      |      |        | <p>This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.</p> <p>National Grid have listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce environmental impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works.</p> <p>Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered (including brownfield sites), how National Grid has coordinated with other projects and a complete project description is contained in:</p> <ul style="list-style-type: none"> <li>• <b>Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);</b></li> <li>• <b>Application Document 4.2 Strategic Options Report (October 2023);</b></li> <li>• <b>Application Document 7.2 Strategic Options Back check Report;</b></li> <li>• <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;</b></li> <li>• <b>Application Document 7.10 Coordination Document; and</b></li> </ul> |               |



| Ref.                                                                                                                                              | Summary of issue                                                                                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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| <ul style="list-style-type: none"> <li>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.</li> </ul> |                                                                                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| AS2                                                                                                                                               | Concerns that the assumption to connect to a substation in the Leiston area is flawed because the construction of the substation is subject to judicial review. | X    | X    | X    | X      | Since the closure of Statutory consultation, the Court of Appeal has rejected the outstanding legal challenge and both Orders remain extant and are expected to be implemented by SPR.                                                                                                                                                                                                                                                                                                                                                                                                              | N             |
| <b>Design</b>                                                                                                                                     |                                                                                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| D1                                                                                                                                                | Query on whether the trench that will be excavated for the onshore cable will be fully reinstated.                                                              |      |      |      | X      | National Grid confirms that this is the case. All trenches will be reinstated to ground level, topsoil replaced and appropriate planting developed. Trees cannot be planted over the cable itself, so where new trees are to be planted they will be planted away from the cable route.                                                                                                                                                                                                                                                                                                             | N             |
| D2                                                                                                                                                | Query as to whether the Friston Substation and Converter station can be sunk into the ground to reduce the visual impact.                                       |      |      |      | X      | <p>With regard to sinking Friston Substation, National Grid has assessed the ground conditions at the proposed site and they are not suitable to allow this to occur. National Grid is looking at how to keep the size as small as possible.</p> <p>Similarly, ground conditions are not amenable to fully sinking the converter station. Excavation of a vast amount of material is also an issue here. Where possible, National Grid is looking at cutting into the slope to provide a small a footprint as possible. The topographical features of the site will be harnessed in the design.</p> | N             |

| Ref. | Summary of issue                                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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| D3   | Query on the width and depth of proposed trenching.                                                                   |      |      |      | X      | The HVDC cables in the marine environment will be bundled together; however, it is anticipated in the terrestrial environment, there will be a degree of separation for thermal efficiency and ease of maintenance. National Grid will be installing 2 HVDC cables in a trench approximately 2.3 m wide and 1.5 m deep.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |
| D4   | Suggestions that all cables (in both Suffolk and Kent) are installed using horizontal directional drilling.           |      |      |      | X      | Where cables are routed through sites with statutory designations, National Grid will employ trenchless solutions. It acknowledges that there will be a temporary impact until the trench is fully reinstated and any planting established. This commitment is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . Horizontal directional drilling is significantly more expensive than open cut trenches in most areas. National Grid is a regulated business and must justify all spending because of the impact spending has on eventual customer bills. Therefore, this method cannot be used for the installation of cables in all locations. Trenchless solutions have been incorporated where necessary or appropriate to reduce environmental impacts. | N             |
| D5   | Query as to whether the Kent Converter Station can be underground or to increase the footprint and reduce the height. |      |      |      | X      | It is not possible to accommodate all of the infrastructure underground due to the ground conditions and the nature of the technology being used in the at the Converter Station. The building will be designed where possible to sit within the landscape. It is not possible from an engineering perspective to increase the footprint of the building and decrease the height.                                                                                                                                                                                                                                                                                                                                                                                                                                           | N             |
| D6   | Suggestions that all cabling should be underground and                                                                |      |      | X    | X      | The amount of overhead line incorporated into the project is only a very small length of the connection provided. Where overhead lines are proposed alternative options have been extensively assessed and while there may be perceived visual benefits associated with use of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N             |

| Ref.              | Summary of issue                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
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|                   | overhead lines should not be used.                                           |      |      |      |        | underground cables, on balance, overhead lines involve less impact on Minister Marshes during construction and over the lifetime of the asset.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| <b>Needs case</b> |                                                                              |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| NC1               | Query as to why the network between Suffolk and Kent needs to be reinforced. | X    | X    | X    | X      | <p>The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. National Grid's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.</p> <p>Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:</p> <ul style="list-style-type: none"> <li>• Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);</li> <li>• Application Document 4.2 Strategic Options Report (October 2023);</li> <li>• Application Document 7.2 Strategic Options Back Check Report;</li> <li>• Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;</li> <li>• Application Document 7.10 Coordination Document; and</li> </ul> | N             |

| Ref.                                                                                                                                              | Summary of issue                                                                                                                                                                                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
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| <ul style="list-style-type: none"> <li>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.</li> </ul> |                                                                                                                                                                                                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| NC2                                                                                                                                               | Suggestions from respondents in Suffolk that the Proposed Project would not be needed if there was an offshore hub with a converter station and a cable directly to Kent and/or the south east, with onshore infrastructure placed on brownfield sites. | X    | X    | X    | X      | <p>In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure.</p> <p>National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.</p> <p>It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.</p> <p>This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.</p> | N             |

| Ref. | Summary of issue                                                                                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
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| NC3  | Concerns from Suffolk residents that the county is bearing the brunt of all infrastructure for electricity for the whole of the South East.                     | X    | X    |      | X      | <p>National Grid recognises that at present there are a number of projects being proposed in the Suffolk area and the disruption this is causing to residents. A significant amount of the electricity generation for Great Britain is off the east coast. This electricity needs to come ashore and be delivered to the whole of the country as over 80% of UK electricity demand is outside of London, therefore it is vital that new infrastructure is provided for the whole country and the electricity generated is distributed accordingly.</p> <p>The Proposed Project is a key part of delivering net zero by 2050 for the whole nation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N             |
| NC4  | Suggestions that there has been a lack of a coordinated strategic approach for the multiple projects that are under consideration in the Proposed Project area. | X    | X    | X    | X      | <p>National Grid has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement. This includes, for example, developing a Coordination Masterplan for the Suffolk Converter Station site in Saxmundham considering how the Converter Stations for Sea Link, Lionlink and Nautilus (should it be required in this location) would work together on the site (see <b>Application Document 7.10 Coordination Document</b>). This shows a coordinated strategy and strategic approach has been taken by NGV and National Grid for the site.</p> <p>National Grid has also been working closely with SPR on the development of the site at Friston, including inputting into the design for the National Grid Substation at Friston that will be constructed under the SPR consent (scenario 1) or as part of the Proposed Project (scenario 2). This joint working has also included initial discussions on development of the Friston site, including the overall landscaping approach and how the National Grid cables interact with the SPR landscaping (including cable routing and construction and techniques)</p> | N             |

| Ref.                                    | Summary of issue                                                                                                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|                                         |                                                                                                                                                                                                                     |      |      |      |        | <p>National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities, including the two examples above (see <b>Application Document 7.10 Coordination Document</b>).</p> <p>The cumulative effects of the Proposed Project together with other projects in the area is assessed in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p> <p>Whilst National Grid acknowledges the number of projects in the area, the team have worked with other developers to reduce the impact of projects on communities and the environment.</p>                                                                                       |               |
| <b>Coordination with other projects</b> |                                                                                                                                                                                                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| CP1                                     | Concern that there is a lack of coordination between the Proposed Project and other energy projects in the Suffolk area and that consequently, the cumulative impact is not being adequately assessed or mitigated. | X    | X    | X    | X      | <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure. National Grid continues to work with other projects to explore opportunities for co-location and coordination.</p> <p>This includes, for example, developing a Coordination Masterplan for the Suffolk Converter Station site in Saxmundham considering how the Converter Stations for Sea Link, Lionlink and Nautilus (should it be required in this location) would work together on the site (see <b>Application Document 7.10 Coordination Document Appendix A NGV Coordination Masterplan</b>). This shows a coordinated strategy and strategic approach has been taken by NGV and National Grid for the site.</p> | N             |

| Ref. | Summary of issue                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
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|      |                                                                             |      |      |      |        | <p>National Grid has also been working closely with SPR on the development of the site at Friston, including inputting into the design for the National Grid Substation at Friston that will be constructed under the SPR consent (scenario 1) or as part of the Proposed Project (scenario 2). This joint working has also included initial discussions on development of the Friston site, including the overall landscaping approach and how the National Grid cables interact with the SPR landscaping (including cable routing and construction and techniques)</p> <p>National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities, including the two examples above (see <b>Application Document 7.10 Coordination Document</b>).</p> <p>The cumulative effects of the Proposed Project together with other projects in the area is assessed in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p> <p>Whilst National Grid acknowledges the number of projects in the area, the team have worked with other developers to reduce the impact of projects on communities and the environment.</p> |               |
| CP2  | Queries as to whether there is a benefit from the coordination of projects. | X    | X    | X    | X      | <p>National Grid is committed to coordinating consenting and delivery with other projects where opportunities are available, including the colocation of infrastructure where it can be demonstrated that this will support reductions in cumulative impacts.</p> <p>There are benefits to co-location with other projects because if infrastructure can be sited in one location it reduces the difficulties associated with finding locations for up to two other converter station sites in the surrounding area which meet the requirements for the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N             |



| Ref. | Summary of issue                                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
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|      |                                                                                                                                                                        |      |      |      |        | connection agreements, whilst taking into account landscape designations and other sensitive receptors, etc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| CP3  | Concerns that National Grid has not presented a complete picture of all the energy projects in the Suffolk area, and that a coordinated review needs to be undertaken. | X    | X    | X    | X      | <p>National Grid has endeavoured to show information on other projects where possible. As part of the Statutory consultation, the Project Overview Document produced for the Statutory consultation included a map which included the Draft Order Limits for the Proposed Project alongside committed and planned developments in Suffolk. These other developments included Sizewell C, East Anglia One North, East Anglia Two, LionLink and Nautilus. The interactive map on the project website during the Statutory consultation also included a number of layers showing the location of other infrastructure projects in Suffolk. National Grid did not include these developments on all of its plans as it would have made the plans more difficult to understand.</p> <p>National Grid as part of their submission has produced a report on coordination which covers how they approached coordination with other projects with the aim of reducing the impact on the environment and local communities (see <b>Application Document 7.10 Coordination Document</b>).</p> <p>Additionally, the cumulative effects of the Proposed Project and the other projects planned in Suffolk is considered in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p> | N             |
| CP4  | Query regarding why the Proposed Project was not constructed at the same time as the Nemo Link.                                                                        |      |      |      | X      | <p>Nemo was installed by National Grid Ventures, which although part of National Grid PLC, is a legally separate company to National Grid Electricity Transmission.</p> <p>Nemo is an interconnector to Belgium and is used to import and export power with Europe. The Proposed Project is a transmission</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N             |

| Ref.                                 | Summary of issue                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                      |                                                                                                                                    |      |      |      |        | reinforcement project that is used to transport power around the National Grid in the UK; they have different functions and programmes so could not be combined.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| <b>Safety</b>                        |                                                                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| S1                                   | Concerns that the Proposed Project, particularly the marine cable, is vulnerable to attack/sabotage outside from outside agencies. |      |      |      | X      | <p>As an operator of national infrastructure, National Grid commits significant resources and investment into maintaining the security of their sites and assets.</p> <p>National Grid 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>They follow government advice, industry standards and best practice, and the network is designed to allow for potential equipment failure or disruption and be able to continue to deliver safe, secure and reliable electricity.</p> <p>As new assets are built, significant changes are made to any site, or the threat landscape changes, security is considered/reviewed.</p> <p>National Grid would be unable to comment further on security measures.</p> | N             |
| <b>Major accidents and disasters</b> |                                                                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| MAD1                                 | Query as to what emergency measures would be in place in the event of a fire and/or explosion, and                                 | X    | X    |      | X      | <p>During operation National Grid will follow all relevant health and safety policies to reduce the risk of fire and explosion.</p> <p>All Proposed Project buildings will be constructed in accordance with buildings regulations which includes consideration of measures needed</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |

| Ref. | Summary of issue                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|      | in the event of a toxic gas release from Friston Substation.                               |      |      |      |        | <p>in the event of a fire or an explosion. Furthermore, a fire risk assessment will be carried out and the project buildings will be constructed in line with this risk assessment. All buildings are equipped with relevant fire suppression equipment and systems.</p> <p>In accordance with best practice, the fence line of all buildings is placed at a distance to contain an event, such as a fire or explosion, within its confines. Within the fenceline, vegetation is removed to reduce the possibility of the spread of fire.</p> <p>An Emergency Response Plan would be provided for operation and as part of this Plan, resilience exercises are conducted to test the systems and procedures.</p> <p>The fire and rescue service are a key consultee whom National Grid is engaging. They have had a chance to comment on the Proposed Project and National Grid will produce guidance for them for operation.</p> <p>In addition, there is no oil-containing equipment at Friston and so there is less risk of toxic fumes from the Substation.</p> |               |
| MAD2 | Concerns that the Proposed Project will affect the nuclear evacuation route from Sizewell. | X    | X    |      | X      | National Grid is working closely with the Emergency Planning Department at Suffolk County Council with regard to emergency situations. During construction, a project-specific emergency evacuation plan will be provided and there will be no effect on the nuclear evacuation route from Sizewell.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |
| MAD3 | Concerns over the use of SF6 gas at Friston Substation.                                    |      |      |      | X      | It is the policy of National Grid to reduce SF6 gas within the electricity transmission system. For the Proposed Project the plan is to use a non-SF6 gas within the substation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |

## Onshore/offshore EMF

| Ref.                                   | Summary of issue                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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| EMF1                                   | Query regarding the measures that will be put in place regarding electromagnetic fields.               | X    |      |      | X      | <p>In the UK there are exposure limits in place to protect against EMF effects. Those exposure limits have been set independently by an international commission of scientists who carefully review all the research which has investigated EMF and health effects. There have been over four decades of research looking into whether EMFs can cause health effects, and there are no established effects below the exposure limits.</p> <p>The magnetic fields produced by cables are extremely localised. They quickly with distance from the source. Details are contained in <b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b>.</p> <p>All of National Grid's electricity equipment is designed to produce EMFs below the limits set by the Government that are in place to protect us all.</p> | N             |
| <b>Community benefits/enhancements</b> |                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| CBE1                                   | Criticism that there is no consideration for community improvements in the Proposed Project proposals. | X    | X    |      | X      | <p>National Grid supports the delivery of community benefits associated with transmission infrastructure and already has a number of established programmes which deliver this.</p> <p>National Grid is waiting for the Government's position on the provision of community benefits associated with transmission infrastructure. This will determine its future approach.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |
| CBE2                                   | Suggestions made for community improvements and enhancement.                                           | X    | X    | X    | X      | National Grid is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |

| Ref.                        | Summary of issue                                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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| <b>Timescales/programme</b> |                                                                                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| TP1                         | Concerns over the length of the timeframe for the Proposed Project together with other projects in the area; concerns over the cumulative impacts. | X    | X    | X    | X      | <p>The construction programme as a whole is estimated to be around four years, however, exact details of the different stages are yet to be confirmed.</p> <p>The cumulative impact assessment for the Proposed Project was based on the most up-to-date information for other projects in the area. Information can be found in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p>                                                                                                                                                                                                                                                                                   | N             |
| TP2                         | Requests to provide a detailed programme.                                                                                                          |      |      |      | X      | <p>An indicative construction programme is provided in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. The design-life of the different Proposed Project elements are also provided.</p> <p>A detailed construction programme cannot be completed until the construction contractors are appointed. Requirement 4 of the draft Development Consent Order (<b>Application Document 3.1 draft Development Consent Order</b>) requires that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme.</p> | N             |
| TP3                         | Concerns over the sequencing of construction work and the potential for work to cross several bird                                                 | X    | X    |      | X      | National Grid acknowledges your concerns regarding timeframes for construction. Impacts on birds are assessed in <b>Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology</b> . National Grid is committing to a full seasonal restriction (1st Nov-31st March) for offshore cable installation activities in the Outer Thames Estuary SPA (2 km buffer to be agreed) and a reduced seasonal restriction (1st Jan-31st March) for                                                                                                                                                                                                                                                                                                   | N             |

| Ref.              | Summary of issue                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|                   | breeding/wintering seasons.                                                                   |      |      |      |        | <p>Suffolk landfall cable installation activities. This commitment is contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>Requirement 4 of the draft Development Consent Order (<b>Application Document 3.1 draft Development Consent Order</b>) requires that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme. This will set out the sequencing of construction work and enable it to be considered in the context of bird breeding and wintering seasons.</p> |               |
| TP4               | Suggestions that the construction works in the area are coordinated.                          | X    |      |      | X      | National Grid has engaged with other project developers, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities, see <b>Application Document 7.10 Coordination Document</b> .                                                                                                                                                                                                                                                                                                                           | N             |
| <b>Mitigation</b> |                                                                                               |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| M1                | Many suggestions made in response to question 19 on the feedback form for mitigation measures |      |      | X    | X      | The Proposed Project team greatly appreciate the insights of the local communities in how they can best mitigate any residual impacts on the environment and enhance the environment further than its baseline condition. The EIA process is responsible for establishing the baseline environmental condition of the Proposed Project area, which then determines the mitigation that National Grid must put in place. This is                                                                                                                                                                                                                                                                                                                                                                                                                                 | N             |

| Ref. | Summary of issue                                                                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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|      | that National Grid can adopt.                                                                                                                                  |      |      |      |        | then discussed with the relevant statutory advisory services such as Natural England, Historic England and the Environment Agency. National Grid has had regard to the feedback of the local community described in this report throughout this process, including feedback being provided to and read by the environmental specialists who are responsible for determining the mitigation measures to be put in place, and is actively being considered within the relevant Management Plans to be provided to the Main Works Contractors'. Mitigation measures are listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> .    |               |
| M2   | Reassurance sought that the mitigation hierarchy has been applied at every stage of the Proposed Project.                                                      | X    | X    |      | X      | National Grid can confirm that the mitigation hierarchy has been applied at each stage of project development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |
| M3   | Suggestions that the previous damage caused by the Nemo Link needs to be highlighted to understand how to better mitigate the impacts of the Proposed Project. |      |      |      | X      | <p>The Nemo Link was a joint venture, continental interconnector in partnership with Belgian Elia. The Proposed Project is a piece of domestic transmission infrastructure owned by National Grid.</p> <p>National Grid is committed to a trenchless solution beneath the sensitive saltmarsh habitat at Pegwell Bay and it has not included the option of a trenched installation. The commitment to a trenchless solution is secured in Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>While the Proposed Project team has listened carefully to the points raised with regard to the Nemo Link, this was a separate project which</p> | N             |



| Ref.                | Summary of issue                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
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|                     |                                                                                   |      |      |      |        | assessed a different installation methodology to that of the Proposed Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| <b>Consultation</b> |                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| C1                  | Suggestions to hold meaningful discussions with Suffolk and Kent Wildlife Trusts. |      |      |      | X      | National Grid has engaged with both Suffolk and Kent Wildlife Trusts throughout the development of its proposals. National Grid has treated both Trusts as non-prescribed consultees and therefore consulted them as part of both the Statutory and Targeted consultations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N             |
| C2                  | Suggestion to present the complete picture of projects in the area.               | X    | X    | X    | X      | <p>National Grid has endeavoured to show information on other projects where possible. As part of the Statutory consultation, the Project Overview Document produced for the Statutory consultation included a map which included the Draft Order Limits for the Proposed Project alongside committed and planned developments in Suffolk. These other developments included Sizewell C, East Anglia One North, East Anglia Two, LionLink and Nautilus. The interactive map on the project website during the Statutory consultation also included a number of layers showing the location of other infrastructure projects in Suffolk. National Grid did not include these developments on all of its plans as it would have made the plans more difficult to understand.</p> <p>Additionally, the cumulative effects of the Proposed Project and the other projects planned in Suffolk is considered in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p> | N             |
| C3                  | Suggestion to present all the energy projects planned and join together the       |      |      |      | X      | National Grid is not an electricity generator in its own right – its role is to ensure that power can be transported from where it is generated to where it is needed. Whilst National Grid Ventures, a legally-separate part of the National Grid Group, is responsible for two energy projects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | N             |

| Ref. | Summary of issue                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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|      | consultations for all projects in the area. |      |      |      |        | <p>planned in East Anglia (the LionLink and Nautilus interconnectors), the range of other energy projects being planned in East Anglia are being developed by different private developers.</p> <p>National Grid considered the cumulative effect of these other projects when developing its plans for the Proposed Project, with more information available for Suffolk in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b>.</p> <p>They have additionally considered the potential for coordination of their proposals with National Grid Ventures' proposals throughout the development of plans for the Proposed Project. Coordination with National Grid Ventures has been considered as part of every public consultation on the Proposed Project, with the Saxmundham converter station site having been identified partially because of its capacity to accommodate further converter stations, such as those that would be required for the National Grid Ventures projects.</p> <p>That said, it is not possible to bring all these different projects forward at the same time as they are at varying different stages of development. For example, projects such as Sizewell C, East Anglia ONE North and East Anglia TWO all now have development consent. The Proposed Project has now submitted its DCO application, whilst National Grid Ventures' LionLink and Nautilus interconnectors are at a much earlier stage of development. Delaying the more advanced projects in this area to allow for consultation on all projects at the same time means that projects such as the Proposed Project, which has been identified by the National Energy System Operator as an 'essential' project that needs to be operational by the end of 2030, may not meet these deadlines. This would prevent other projects from connecting into the network and thereby jeopardize the UK's ability to meet its net zero targets.</p> |               |

| Ref. | Summary of issue                                                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Design change |
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| C4   | Criticism that the consultation exercise was a PR exercise using jargon rather than an attempt to gauge the impact of the Proposed Project. Criticism that National Grid did not listen to public opinion. | X    |      |      | X      | <p>National Grid has carefully considered all feedback submitted in response to its pre-application public consultations when developing its plans. Throughout the development of the proposals, it has sought to show how feedback has informed the development of the plans. For example, the Project Overview Document published as part of the Statutory consultation specifically addresses how feedback had informed changes to its plans, whilst the Non-Statutory Consultation Report considers in further detail feedback received to the Non-statutory consultation. This Consultation Report provides a detailed analysis of feedback received to National Grid's pre-application public consultations on the Proposed Project, along with how this feedback informed the development of its plans.</p> <p>When undertaking its pre-application consultations, National Grid sought to avoid the use of jargon and technical terms wherever possible. Where present, it endeavoured to define any unfamiliar technical terms as part of its consultation materials. Additionally, it produced materials with the specific purpose of explaining the proposals in as non-technical a manner as possible. These documents include the Project Overview Document – 10 minute read and the Preliminary Environmental Information Report – non-technical summary (see section 13 and 16 <b>Application Document 5.1.6 Appendix E Statutory consultation</b>) both of which were published as part of the Statutory consultation.</p> | N             |
| C5   | Criticism that the maps showing the draft Order Limits were confusing and some of the diagrams were confusing to understand.                                                                               | X    |      |      | X      | <p>National Grid sought to provide plans and explanations that were as clear as possible. For example, on both page 31 and page 35 of the Project Overview Document published as part of the Statutory consultation, it explained what the draft Order Limits represent.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N             |

| Ref. | Summary of issue                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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| C6   | The consultation process has been stressful and confusing and has led to effects on the mental health of local residents in Suffolk.                   | X    | X    |      | X      | National Grid recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, National Grid has sought to provide certainty on the plans wherever possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |
| C7   | Concerns that the National Grid personnel present at the public exhibitions could not answer questions posed about the impact of the Proposed Project. |      |      |      | X      | <p>A range of technical disciplines were represented at each public information exhibition. All members of the team were able to talk about the broad plans for the Proposed Project, whilst representatives from each discipline were able to talk about their specialism in further detail. Where a person attending the public information exhibitions expressed a desire to talk about a specific subject, the Proposed Project team tried to ensure that they were able to talk to the relevant discipline wherever possible, but this may have not always been possible.</p> <p>On occasion queries were raised that the team was not yet able to answer due to the stage of the project. The challenge with timing consultation events is to time them sufficiently early in the process that there remains genuine opportunity to shape the project, whilst having proposals that are sufficiently detailed to be consulted on. In seeking this balance, it is noted that not all assessments had been completed at the time of Statutory Consultation. Therefore, some detailed questions on survey results and impacts could not be answered in full at that stage of the project.</p> | N             |
| C8   | Comments that the model on display at                                                                                                                  |      |      |      | X      | The indicative 3D model available at the public information exhibitions was one of several tools utilised by National Grid to help explain its                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |

| Ref. | Summary of issue                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|      | the public exhibitions was misleading in its scale.                                                                                         |      |      |      |        | proposals. In developing the model, National Grid has sought to balance the need to show other nearby infrastructure, such as that at Richborough Energy Park, with the need for the model to be at an appropriate size. The model included local road names and was to scale, whilst members of the team were on hand at each event to help explain what the model showed in further detail.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| C9   | Criticism that local residents were not aware of the Statutory consultation exercise and that the feedback form included leading questions. |      |      |      | X      | <p>A range of measures were employed to help promote the Statutory consultation. These promotional measures included sending a newsletter (see section 7 <b>Application Document 5.1.6 Appendix E Statutory consultation</b>) to every property in the Primary Consultation Zone that gave details of the consultation, including details of every public information exhibition. The Statutory consultation and public information exhibitions were also advertised in local newspapers and on social media. The locations referenced by the respondent are all within the Primary Consultation Zone, and were therefore due to receive this newsletter, which was sent via Royal Mail.</p> <p>National Grid considers that the Feedback Form (see section 8 <b>Application Document 5.1.6 Appendix E Statutory consultation</b>) produced for the Statutory consultation did not include leading questions. Every question included a free text box in which respondents could provide further written comments. When asking about its proposals in each area of the Proposed Project route, it specifically sought feedback on whether respondents did or did not support a given aspect of the proposals.</p> <p>Although the Feedback Form sought feedback on specific areas of National Grid's proposals, at question 20 it also invited respondents to provide comments on any aspects of the proposals not covered elsewhere in the Feedback Form. Furthermore, whilst the Feedback</p> | N             |

| Ref.                                     | Summary of issue                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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|                                          |                                                                         |      |      |      |        | Form was provided to help people provide their consultation response, free text responses could also be submitted by email or post.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| C10                                      | Lack of detailed engagement on a technical level.                       |      | X    |      |        | <p>Statutory consultation was undertaken in accordance with the SoCC (see Section 6 <b>Application Document 5.1.5 Appendix D SoCC</b>) which itself was subject to extensive consultation with the host LPAs and prepared in accordance with all applicable statutory requirements pursuant to the Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017 as well as other relevant guidance.</p> <p>The material published for Statutory consultation was based on the information available at that time and was of sufficient detail to enable informed feedback to be provided on the emerging scheme proposals. National Grid 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 the Statutory consultation (and indeed all other consultation and engagement activities undertaken by National Grid as part of the National Grid acknowledges the Council's concerns) have been considered and taken into account as set out within <b>Application Document 5.1 Consultation Report</b>.</p> <p>Following Statutory consultation, National Grid committed to ongoing engagement with stakeholders, including a programme of thematic meetings, addressing specific aspects of the Proposed Project design and potential impacts arising during construction and operation.</p> | N             |
| <b>Walking, Cycling and horse-riders</b> |                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| WCH1                                     | Concerns over the impact of the Proposed Project on the PRoW (including | X    | X    | X    | X      | National Grid has rigorously assessed the Proposed Project's impact on footpaths adhering to the mitigation hierarchy by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |

| Ref. | Summary of issue                                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
|------|-----------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | bridleways) in Suffolk and Kent including the Heritage Coast footpaths, e.g. the King Charles III England Coast Path. |      |      |      |        | <p>National Grid has a temporary impact on a PRow during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided and implemented prior to the closure.</p> <p>Impacts on footpaths are considered in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism and Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>. Potential impacts on PRow and walking and cycling routes including the King Charles III England Coast Path are also considered within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport</b>.</p> <p>Separate Outline PRow Management Plans have been prepared for Suffolk and Kent as part of the DCO application. These have been developed in consultation with the relevant local highways authorities and PRow officers and provide details on PRow diversions, closures and management during the construction, operation and decommissioning phases of the Proposed Project. The King Charles III England Coast Path has also been considered where any management and mitigation measures are required given its significance. See <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>.</p> |               |
| WCH2 | Impact on the ability of cyclists to use the quiet lanes in Suffolk.                                                  | X    |      |      | X      | National Grid acknowledges the concerns regarding quiet lanes and the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> . National Grid considers sensitive receptors when drawing up the proposed construction access routes. For example, Grove Road (which                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N             |



| Ref.                       | Summary of issue                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|----------------------------|-----------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                            |                                                                                   |      |      |      |        | <p>is designated as a quiet lane) will only be used as a vehicle crossover between two proposed access points, to allow construction vehicles to continue along the haul road. Grove Road will not therefore be used by construction vehicles, other than when these are required to cross Grove Road (which will be managed).</p> <p>As above, the impacts will be temporary during the construction phase and mitigation measures will be put in place to minimise any potential impacts; see <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>.</p>                                                                                                                                                                                                                                                                                                                            |               |
| WCH3                       | Concerns over the safety of cars and of pedestrians using pavements on the B1121. | X    | X    |      | X      | <p><b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> includes a review of the collision record (based on full collision data obtained from Suffolk County Council) and an assessment of Road Safety and Hazardous/Large Loads for the study area during the construction phase, including the A12/ B1121 junction and the B1121 Main Road to the south of Saxmundham. This 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 road safety of the B1121, with the proposed embedded mitigation and control and management measures in place, as identified within the <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk</b>. Further consultation was held with Suffolk County Council as the ES was prepared.</p> | N             |
| <b>Land rights and CPO</b> |                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| LCPO1                      | Concerns over the impact on landowners and the need to provide compensation.      |      |      |      | X      | <p>National Grid acknowledges that the Proposed Project may cause concern to landowners.</p> <p>National Grid will pursue voluntary agreements with affected landowners. Compensation offered for voluntary land rights is benchmarked against</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |

| Ref.                                  | Summary of issue                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Design change |
|---------------------------------------|----------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                       |                                                                                                          |      |      |      |        | <p>other similar utility providers. If a voluntary agreement cannot be reached, then the Compulsory Purchase Compensation Code allows for a claim of compensation for the loss that property owners may have suffered as a direct result of the retained part of their property ownership being worth less as a direct result of the works. Compensation for compulsory acquired rights is governed by statute.</p> <p>National Grid is and will continue to work with all landowners including farmers who may be directly affected by the Proposed Project to understand the impacts on their operations and to work with them as the construction programme is developed. National Grid will seek to work with the farming community to limit disruption where practicable. Compensation claims for disturbance are considered on a case-by-case basis if negative impact on farming operations can be established.</p> |               |
| <b>Project finance/cost of scheme</b> |                                                                                                          |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| PF                                    | Concerns that National Grid is putting cost before the environment when developing the Proposed Project. |      |      |      | X      | <p>National Grid acknowledges these concerns. However, the need to reinforce the network in this area determines the geographical parameters for delivering the Proposed Project. National Grid is seeking to minimise potential impacts through careful consideration of construction methods and design, while the EIA process is responsible for establishing the baseline environmental condition of the Proposed Project area. This then determines the mitigation that must be put in place and is then discussed with the relevant statutory advisory services.</p> <p>National Grid's duties and obligations involve balancing the need to be economic and efficient, whilst also having regard to preserving amenity which includes, among others, the natural environment, cultural heritage, landscape and visual quality.</p>                                                                                  | N             |

| Ref.                | Summary of issue                                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| PF2                 | Suggestion that the Proposed Project is not good for customers and is not financially viable due to the high level of compensation and mitigation required. | X    |      |      | X      | The Government and the Regulator (Ofgem) expect National Grid to find a balance when developing proposals, taking account of the duties set out in the Electricity Act 1989 to be efficient, coordinated and economical and to have regard to the desirability of preserving amenity. When looking at the costs of a new connection, National Grid is guided by the laws, policies and regulations that have been set by Government on behalf of electricity consumers and society. National Grid is required through those to balance affordability to the electricity bill payer with the impact of the proposals on the environment. National Grid considers that the Proposed Project strikes a justifiable balance in the context of national policy and National Grid's statutory duties, which include the need to be economic and efficient. It is for the Government, through the planning process, to confirm whether this balance is right. | N             |
| PF3                 | Concern over impact on property prices.                                                                                                                     |      |      |      | X      | National Grid acknowledges that development may cause concern to landowners. Diminution in property value known as 'injurious affection' and any other appropriate heads of claim will be considered on an individual basis in accordance with current legislation. The Compulsory Purchase Compensation Code allows for a claim of compensation for the loss that property owners may have suffered as a direct result of the retained part of their property ownership being worth less as a direct result of the works.                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |
| <b>Construction</b> |                                                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| C1                  | Impact of construction compounds and haul roads.                                                                                                            | X    | X    | X    | X      | The locations of construction haul roads and compounds have been selected to minimise the impact on the environment wherever possible. During construction, contractors will be required to adhere to <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> and develop their own task-specific management plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N             |

| Ref. | Summary of issue                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|------|-------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| C2   | Concerns over the impact of the Proposed Project on the expansion of Aldeburgh Golf Club. |      |      |      | X      | The HVDC cable route in the vicinity of Aldeburgh Golf Club was moved further away from residential properties which led to the route having no interaction with the proposed expansion or the plans the Golf Club has for a new irrigation network.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Y             |
| C3   | Concern that there is limited information about the construction of the Proposed Project. |      |      |      | X      | <p>Available information of the proposed methods and programme of construction is provided in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. Outline information on the proposed permanent access roads, temporary haul roads and compounds is also provided.</p> <p>Project drawings indicate where construction compounds will be located, including typical compound layouts. Compound site restoration will follow a standard method that has successfully been implemented in numerous other sites, which have reverted to previous uses with no lasting adverse impacts. Furthermore, National Grid is working with other developers to identify opportunities to coordinate construction activities.</p> <p>A detailed construction programme cannot be completed until the construction contractors are appointed. Requirement 4 of the draft Development Consent Order (<b>Application Document 3.1 Draft Development Consent Order</b>) states that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme.</p> | N             |
| C4   | Suggestion to ensure that the construction workforce are adequately trained               |      |      |      | X      | During construction, contractors will be required to adhere to <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> and develop their own task-specific management plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |

| Ref.                      | Summary of issue                                                                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                           | and comply with all procedures and management plans.                                                                                          |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| C5                        | Construction work on a Saturday afternoon is not acceptable.                                                                                  | X    | X    |      | X      | <p>Since publication of the PEIR within Statutory consultation, the proposed construction working hours have changed. The change of these hours has been consulted on as part of the Targeted consultation.</p> <p>8.5.6 The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:</p> <ul style="list-style-type: none"> <li>Monday – Friday: 0700 to 1900; and</li> <li>Saturday, Sunday and Bank Holidays: 0700 to 1700.</li> </ul> <p>Details relating to the proposed construction working hours and any associated restrictions are contained in <b>Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| <b>Norwich to Tilbury</b> |                                                                                                                                               |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| NT1                       | Suggestion that the Proposed Project's plans should be modified to reduce the scale of development for the planned Norwich to Tilbury scheme. | X    | X    | X    | X      | <p>The Proposed Project is a separate project to Norwich to Tilbury. Each project is designed to meet specific network reinforcement needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030. Since the connecting projects are being promoted by different companies, with different project teams, covering several different geographical locations and on different timelines for delivery, it is not possible to co-ordinate simultaneous delivery of all of the network reinforcements coming forward under the Great Grid Upgrade programme.</p>                                                                                                                                                                                                                                                                                                         | N             |

| Ref. | Summary of issue | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback) | Design change |
|------|------------------|------|------|------|--------|----------------------------------------------------------------------------------|---------------|
|      |                  |      |      |      |        |                                                                                  |               |
|      |                  |      |      |      |        |                                                                                  |               |

## 8.6 Responding to the Feedback

- 8.6.1 In accordance with Section 49 of the Planning Act, this Chapter has demonstrated how National Grid has had regard to the matters raised within the relevant responses submitted to the Statutory consultation.
- 8.6.2 The tables contained in sections 24 and 25 of **Application Document 5.1.6 Appendix E Statutory consultation** and referenced within this chapter provide:
- a verbatim record of the relevant responses received by Section 42(1)(a) prescribed bodies, Section 42(1)(b) local authorities and Section 42(1)(d) land interests to National Grid's Statutory consultation, and National Grid's response to these matters, in accordance with Section 49 of the Planning Act 2008 (see section 24 of **Application Document 5.1.6 Appendix E Statutory Consultation**); and
  - a record of the relevant responses to National Grid's Statutory consultation carried out under Sections 47 and 48 of the Planning Act 2008, together with details of how National Grid has had regard to those relevant responses, in accordance with Section 49 of the Planning Act 2008 (see section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation**).

## 8.7 Evolution of the Proposed Project in Response to Statutory Consultation Feedback

- 8.7.1 As set out in Chapter 3 of this report, Section 49 of the Planning Act 2008 requires National Grid to have regard to relevant responses received in response to consultation and publicity undertaken pursuant to Section 42, Section 47 and Section 48. This section of the report provides details of how the relevant responses have influenced the evolution of the Proposed Project.
- 8.7.2 The pre-application consultation for the Proposed Project informed the ongoing process of developing the proposals and influenced the iterative nature of the consultation approach and mitigation commitments. Further details are provided in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered and Application Document 7.3 Design Development Report**.
- 8.7.3 At each stage of consultation, National Grid has reviewed the feedback received. Where appropriate, National Grid has sought to refine its proposals in response to the feedback from the consultation processes. National Grid has, in other cases, taken account of the relevant responses in the preparation of the Environmental Statement and other DCO application documents.
- 8.7.4 In summary, feedback received during the Statutory consultation informed the development of the Proposed Project in the following ways:
- development of design; and
  - approach to assessment scenarios/methodologies and commitment to mitigation and enhancement measures in the EIA.
- 8.7.5 National Grid undertook a review of all the responses that had been received through the Statutory Consultation process. Some of these responses lead to changes to the Proposed Project which are described in the Development of Design section, below, and in Table 8.5. Responses that either could not be accommodated or that National



Grid considered should not lead to changes to the Proposed Project are set out in Table 8.6.

## Development of Design

- 8.7.6 Following responses received from the Statutory consultation, National Grid has made changes to the Proposed Project. The changes relate to:
- **permanent infrastructure:** proposed changes to the permanent infrastructure planned including the cable routes and converter stations/substation(s);
  - **construction and maintenance work:** proposed changes to how National Grid would build and maintain the Proposed Project during the construction and operation phases;
  - **mitigation, enhancements and approach to biodiversity net gain:** proposed changes to how National Grid will mitigate the impact of the Proposed Project on the environment and deliver enhancements to the local environment; and
  - **strategy for coordination:** proposed changes to how National Grid will coordinate the construction and operation of the Proposed Project with other projects planned in Suffolk.
- 8.7.7 As National Grid's plans have evolved in response to consultation feedback, further technical work and environmental assessments; it has also made a range of smaller changes to the Proposed Project. These include various refinements, including reductions and increases to the size of the draft order limits.
- 8.7.8 The changes made are presented in Table 8.5 and further information is provided in Table 9.1 of Chapter 9.

Table 8.5 Changes to Proposed Project following Statutory consultation

| Area of change                                 | Design change                                                                                                                                                                                                                                                                                          |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Suffolk Onshore Scheme</b>                  |                                                                                                                                                                                                                                                                                                        |
| <b>Permanent infrastructure</b>                |                                                                                                                                                                                                                                                                                                        |
| HVAC cable route                               | In response to ongoing engagement with NGV and SPR, the length of the HVAC cable route has increased by approximately 0.2 km due to a number of minor refinements to the cable corridor and the routeing of the cables into the converter station near Saxmundham and the proposed Friston Substation. |
| HVDC cable route                               | The HVDC route has been realigned near Leiston Road, moving it further away from the road. This change would move construction activity further away from nearby residential properties.                                                                                                               |
| Saxmundham converter station and access bridge | A modified version of the proposed western construction and maintenance access route for the Saxmundham converter station site has been identified. The changes include moving the point at which                                                                                                      |

| Area of change                                                       | Design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                      | <p>the access route crosses the river further north, to reduce interaction with the flood zone.</p> <p>The height of the bridge over the River Fromus has been increased due to feedback National Grid received from the Environment Agency during Statutory consultation. The Environment Agency has requested a bridge height of 6 m due to concerns regarding compliance with the Water Framework Directive. However, National Grid's preference is for a 4 m high bridge and so two bridge height options (4 m and 6 m) have been taken forward to the DCO submission whilst discussions continue with the Environment Agency.</p> |
| <b>Construction and maintenance work</b>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Construction and maintenance compounds                               | National Grid has refined the size and location of several construction compounds that were shown in the general arrangement plans during the Statutory consultation. To facilitate colocation with NGV given their current design development stage, additional optionality for the construction compounds to support the Converter Station Development was added.                                                                                                                                                                                                                                                                    |
| Construction and maintenance access                                  | Changes have been made to several construction accesses in response to feedback and construction requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Working hours                                                        | To give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, it has identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours.                                                                                                                                                                                                                                                                                                                                                                             |
| Temporary pylons or masts                                            | If Friston Substation has been constructed as part of SPRs East Anglia ONE North and East Anglia TWO Projects development consent, only a connection into the Substation would be constructed by the Proposed Project and no temporary pylons would be needed. In the event that National Grid is required to build Friston substation themselves (meaning that it is not built under SPRs existing consent), some temporary pylons will need to be built during its construction.                                                                                                                                                     |
| <b>Mitigation, enhancement and approach to biodiversity net gain</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Additional land                                                      | The draft order limits for the Proposed Project have changed in some areas to allow for further environmental mitigation, enhancement following responses received to Statutory consultation.                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Strategy for coordination</b>                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| General                                                              | The Proposed Project has been developed as a standalone project but has been designed in a coordinated way with other projects, including two potential NGV projects. As development work on the Proposed Project and these other projects has progressed, National Grid's approach to coordination has evolved.                                                                                                                                                                                                                                                                                                                       |
| Cable corridors and landfall                                         | For the HVDC cable route, this reflects the fact that LionLink no longer prefers the Aldeburgh landfall and onward cable route. For the shorter HVAC route, the Proposed Project design has been refined to                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Area of change     | Design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | <p>remove the LionLink cables to allow NGV, whose project is at an earlier stage, to fully consider and consult on the most appropriate AC cable route.</p> <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' evolving requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure. National Grid continues to work with other projects to explore opportunities for co-location and coordination.</p> <p>As part of the DCO submission, National Grid has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and location communities, see <b>Application Document 7.10 Coordination Document</b>.</p> |
| Converter stations | <p>The preferred location of the Suffolk Converter Station has been confirmed within the wider site, and the draft order limits have been refined to remove the areas that may be required for the future NGV projects' converter stations.</p> <p>However, one of the reasons that the Saxmundham site was identified was because of its capacity to accommodate further converter stations, and National Grid continue to work collaboratively with NGV to consider the most appropriate way of developing the wider site in a coordinated way. The Saxmundham Converter Station coordination masterplan is Appendix B of <b>Application Document 7.1</b>.</p>                                                                                                                                                                                                       |

## Offshore Scheme

### Permanent infrastructure

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Offshore route location | <p>In response to feedback received during Statutory consultation and additional cable route development, various refinements to the marine HVDC cable route have been made, resulting in a reduction of the offshore cable route length of approximately 8 km. The changes will allow the avoidance of areas where aggregate is extracted from the sea, the Goodwin Sands marine protection area, migrating sands (which are less suited to cable protection), and the Harwich deep water channel and SUNK pilot station.</p> <p>Further technical work has also identified a need for further rock emplacement (where rock is used to backfill the marine cable trench after the cable has been laid).</p> |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Kent Onshore Scheme

### Permanent infrastructure

|                  |                                                                                                                                         |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| HVDC cable route | The HVDC cable route near the A256 has been realigned to avoid existing buried water infrastructure in this area. In this location, the |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------|

| Area of change                           | Design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          | use of trenchless crossing technology is proposed to reduce the impact of construction activity on road users.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Converter station height                 | <p>Following more detailed design work after completing site surveys, National Grid is proposing to increase the ground level at the converter site around the converter station height by constructing a stone platform of up to 2 m.</p> <p>The ground beneath the platform may need to be improved by such methods as installing modular columns; the approach taken will depend on ongoing and future detailed survey work.</p> <p>The maximum height of the converter station buildings themselves would not change. However, as these structures would now be on a raised platform, the maximum total height will now be 28 m rather than 26 m.</p> |
| Location and type of new pylons          | <p>Following the Environmental Impact Assessment, National Grid confirm the use of full-height (approximately 50 m) lattice pylons for the connection between the proposed combined converter station/substation and the Richborough to Canterbury 400 kV overhead line. This means there would be fewer new pylons in total when compared to the low-height pylon option.</p> <p>Additionally, the location of these pylons has been refined to reduce the size of the triangular area that would be formed by the construction of pylons between the existing overhead line and the proposed substation.</p>                                            |
| <b>Construction and maintenance work</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Construction and maintenance compounds   | <p>One of the construction compounds previously proposed to the east of the A256 has been removed and the size of the compound to the west of the A256 is increasing.</p> <p>The size of the compound north of the converter station site has also reduced.</p>                                                                                                                                                                                                                                                                                                                                                                                           |
| Construction and maintenance access      | <p>To avoid using the saltmarsh as an access route, National Grid is proposing a new construction and maintenance access off Sandwich Road via the former hoverport in Pegwell Bay. This includes a compound off Sandwich Road.</p> <p>In response to feedback and construction requirements, National Grid has made amendments to several construction accesses, including adding or removing accesses in some areas.</p>                                                                                                                                                                                                                                |
| Working hours                            | <p>To give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, it has identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours.</p>                                                                                                                                                                                                                                                                                                                                                                                         |
| Temporary pylons and masts               | <p>The existing overhead line between Richborough and Canterbury in the vicinity of the converter station and substation site would need to be diverted during construction. To facilitate this work, up to six temporary pylons would need to be provided, or guyed masts</p>                                                                                                                                                                                                                                                                                                                                                                            |

| Area of change                                                       | Design change                                                                                                                                                    |
|----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                      | (structures that use tensioned cables attached to the ground for stability) would be used.                                                                       |
| <b>Mitigation, enhancement and approach to biodiversity net gain</b> |                                                                                                                                                                  |
| Additional land                                                      | The draft order limits for the Proposed Project have changed in some areas to allow for further environmental mitigation, enhancement and biodiversity net gain. |

## Design Changes Not Made and Why

- 8.7.9 In accordance with the August 2024 Advice on the Consultation Report Guidance, Table 8.6, below, provides a summary (on a thematic basis using the themes set out in the consultation summary at Table 8.4) to explain why National Grid considered that some of the feedback received could not be accommodated or should not lead to changes to the project. Whilst a number of design changes have been introduced (as set out in Table 8.5 above) which relate to the general themes set out below in Table 8.6, not all of the detailed concerns raised in relation to these matters have resulted in design changes. This is also addressed below.

## Converter Station Masterplan

- 8.7.10 At statutory consultation, National Grid consulted on a 'co-location option' in Suffolk, which sought views on the possibility of up to three converter stations anywhere within the wider Saxmundham site. This reflected the ongoing coordination with NGV regarding the interconnector projects Nautilus (which was at the time assumed to be connecting in Suffolk) and Lion Link. An indicative location for the Sea Link converter station was shown, as well as indicative locations for up to two further converter stations. This illustrated what the site could look like with up to three converter stations. These locations were also used as assumptions, where relevant, in some of the PEIR assessments. The statutory consultation also sought views on a series of architectural design approaches, which could inform future detailed design work on the proposed converter stations.
- 8.7.11 Following the statutory consultation, and drawing from the feedback received, these concepts were taken forward as part of the development of a site-wide masterplan and a series of design principles. The masterplan itself is indicative in nature, and consent is not being sought for it. It has therefore not been subject to further statutory consultation, although extensive ongoing engagement was undertaken with the host authorities in Suffolk following statutory consultation, throughout the development of the masterplan and design principles.
- 8.7.12 A detailed masterplan, drawing from previous ongoing engagement, was shared with the host authorities in September 2024 to inform ongoing discussion. Further detailed workshops and meetings were held between November 2024 and February 2025, including the with host authorities, the East Suffolk Design Review Panel, and NGV. Further correspondence and information were exchanged for consideration and comment throughout this period. This process of ongoing engagement allowed the design and masterplan approach to be discussed and explored in detail with the host authorities, with matters discussed including the extent of the Order Limits necessary to deliver the Sea Link elements of the masterplan; the selection of and design approach

to the River Fromus crossing; and opportunities for on-site biodiversity net gain. Regard was had to the outcome of these discussions in an ongoing manner, and this engagement has informed the approach taken to the converter station masterplan and the design principles (**Application Document 7.10.1 NGV Coordination Masterplan, Application Document 7.11.1 Design Approach Document – Suffolk, and Application Document 7.12.1 Design Principles – Suffolk**).

8.7.13

This masterplan (Appendix A of **Application Document 7.10 Coordination Document**) process serves several related purposes. It is partly a feasibility exercise, to explore and demonstrate that the identified converter station site can accommodate up to three converter station projects. It is partly a tool which has informed the refinement of the Sea Link design (and the associated Order Limits and LoDs), ensuring that this has been undertaken having regard to the possible future siting decisions, technical requirements, and mitigation approach of NGV. It is also an overarching vision which can assist National Grid, NGV, the host authorities, and local communities and stakeholders understand how a coordinated converter station site may be developed.

Table 8.6 Summary explanation of the reasons why some feedback did not result in changes to the Proposed Project following Statutory consultation

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Landscape and visual                   | <p>A number of comments were received which raised landscape and visual impacts. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix Statutory Consultation</b>.</p> <p>Following receipt of comments, and as part of the evolution of the Proposed Project, the design was amended and additional mitigation measures incorporated to reduce landscape and visual impacts.</p> <p>These mitigation measures are contained in <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b> and are secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>Notwithstanding these proposed mitigation measures, National Grid accepts that the Proposed Project would unavoidably have some adverse landscape and visual impacts which are assessed in <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual and Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b>.</p> <p><b>Application Document 7.1 Planning Statement</b> considers the landscape and visual impacts of the Proposed Project against the policy tests for NSIPs and concludes that these impacts are in accordance with national planning policy.</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Terrestrial ecology                    | <p data-bbox="424 297 1433 477">Given that it is not practical to deliver the Proposed Project without any residual adverse landscape and visual impacts, and that these impacts have been mitigated and are consistent with national policy, National Grid considered that no further changes to the Proposed Project were required to address comments on landscape and visual impacts.</p> <p data-bbox="424 501 1444 719"><b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme. The assessment concludes that there would not be any significant adverse effects on designated landscapes, including the Suffolk Heaths and Coast AONB, arising from the Suffolk Onshore Scheme.</p> <p data-bbox="424 743 1366 813">For this reason, no further changes were required to the Proposed Project to reduce impacts on the Suffolk Heaths and Coast AONB.</p> <p data-bbox="424 853 1433 958">A number of comments were received which raised ecological issues. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p> <p data-bbox="424 985 1449 1458">The design of the Proposed Project has been informed by an iterative design process advised by qualified professional ecologists. National Grid has set out a series of mitigation and enhancement measures within the Order Limits to increase biodiversity and mitigate impacts on terrestrial ecology. The proposed planting design (as outlined in <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk</b> and <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b>) includes habitat creation, including balancing ponds around the Saxmundham Converter Station and Friston Substation and balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.</p> <p data-bbox="424 1485 1449 1590">Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> secures a number of Management Plans that are designed to protect terrestrial ecology.</p> <p data-bbox="424 1615 1441 1760">The Proposed Project is also committed to achieving 10% Biodiversity Net Gain even though this is not a legal requirement at present. Further details regarding Biodiversity Net Gain are contained in <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report</b>.</p> <p data-bbox="424 1830 1452 2078"><b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3: Ecology and Biodiversity</b> and <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3: Ecology and Biodiversity</b> record that the Proposed Project would also have some less than substantial positive effects due to habitat creation in both Suffolk and Kent. The Proposed Project avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|                                        | <p>features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in <b>Schedule 3 of Application Document 3.1 draft Development Consent Order</b>.</p> <p>National Grid therefore considers that no additional changes are required to the Proposed Project to further reduce and mitigate impacts on terrestrial ecology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with the policies of NPS EN-1 and NPS EN-5 that relate to the protection of ecological sites and features.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Cultural heritage                      | <p>A number of comments were raised which raised issues relating to cultural heritage. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p> <p>A Heritage Statement is submitted as Appendix E of <b>Application Document 7.1 Planning Statement</b> which concludes that, in accordance with national policy and guidance, the Proposed Project would not result in substantial harm to any designated or non-designated assets.</p> <p>The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to two designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality.</p> <p>In accordance with the NPS EN-1 paragraphs 5.9.32 and 5.9.33, and taking into account of the principles set out in NPS EN-1 paragraphs 4.2.16 and 4.2.17, the substantial public benefits and need for the Proposed Project, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the lower end of the spectrum, to the designated heritage assets and the non-designated heritage asset of schedulable quality. The less than substantial harm upon non designated heritage assets affected by the Suffolk Onshore Scheme is also clearly outweighed by the substantial public benefits and need for the Proposed Project providing the judgement required under paragraph 5.9.33 of NPS EN-1.</p> <p>Following Statutory Consultation, the Proposed Project has been designed, to follow as far as possible, the mitigation hierarchy for</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Water environment                      | <p>impacts on cultural heritage in order to 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.</p> <p>As such National Grid did consider that any additional changes to the Proposed Project were required to make it consistent with national policy in relation to Cultural Heritage.</p> <p>A number of responses relating to adverse impacts on the water environment were received as part of the Statutory Consultation. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p> <p>Following the statutory engagement, National Grid engaged with the Environment Agency, the Lead Local Flood Authority (County Council) and Internal Drainage Boards regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. National Grid has prepared <b>Application Document 6.8 Flood Risk Assessment</b> which has been informed by information on historical and recent flooding incidents in the locality.</p> <p>The Proposed Project was evolved to incorporate a series of mitigation measures to minimise impacts to the water environment during construction and operation, and these are provided in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>. Measures relevant to the control and management of impacts during construction are outlined in <b>Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice</b>.</p> <p><b>Application Document 7.1 Planning Statement</b> confirms that the mitigation hierarchy has been followed, and there are no likely significant residual effects in relation to water environment receptors during all phases of the Proposed Project. National Grid has submitted a WFD assessment (<b>Application Document 6.9 Water Framework Directive Assessment</b>) which confirms that the Proposed Project is not likely to cause deterioration of the WFD status of the waterbodies interacting with the Proposed Project.</p> <p>National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the statutory consultation. As such, it is considered that the Proposed Project is in accordance with both national and local policy with regard to impacts on the water environment and that no further changes are considered necessary to make the Proposed Project consistent with national policy in this regard.</p> |
| Geology and hydrogeology               | <p>A number of comments were raised which raised issues relating to concerns relating to geology and/or hydrogeology. These are</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                        | <p>summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E</b>.</p> <p><b>Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology and Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology</b> provide assessments of the likely effects on geology and hydrogeology that could result from construction, operation and decommissioning of the Suffolk Onshore Scheme and Kent Onshore Scheme, respectively. These include assessments of the potential for existing contamination and pollutant linkages, in relation to sensitive receptors such as human health and groundwater. The geology and hydrogeology impacts on receptor sites are assessed within <b>Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Processes</b> as it is located within the marine section of the Proposed Project.</p> <p>With control and management measures set out in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> the potential effects of groundwater contamination are expected to be minor due to mitigation measures</p> <p>Overall, with embedded mitigation measures, there are no likely significant residual effects in relation to geology and hydrogeology that could result from the Suffolk and Kent Onshore Scheme during their construction, operation and maintenance and decommissioning phases.</p> <p>National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to geology and hydrogeology impacts.</p> |
| Agriculture and soils                  | <p>A number of comments were raised which raised issues relating to impacts on agriculture and soils. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E Statutory Consultation</b>.</p> <p>A complete assessment of the impacts on agriculture in Suffolk and Kent have been undertaken and are included <b>Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils and in Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils</b>.</p> <p>Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (<b>Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk</b>) and outline Soil Management Plan (<b>Application Document 7.5.10.2 Outline Soil Management Plan - Kent</b>).</p> <p>The impacts of the Proposed Project on agriculture and soils are assessed against national policy in <b>Application Document 7.1</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| Traffic and transport                  | <p data-bbox="424 293 1426 443"><b>Planning Statement</b> which concludes that the Proposed Project is in accordance with the national policies relating to the protection of agricultural land as the use of agricultural land and the permanent loss of land during construction is justified.</p> <p data-bbox="424 465 1455 645">National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Statutory Consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to agriculture and soils impacts.</p> <p data-bbox="424 685 1402 831">A number of comments were raised which raised issues relating to traffic and transport. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p data-bbox="424 853 1442 999">National Grid has continued to evolve the Traffic and Transport aspects of the Proposed Project following the conclusion of, and in response to, the Statutory Consultation exercise and has liaised with the relevant Highway Authorities.</p> <p data-bbox="424 1021 1422 1200">Following these discussions, <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk and Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent</b> have been incorporated into the Proposed Project.</p> <p data-bbox="424 1223 1445 1480">The Proposed Project is also designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> explain the details of the temporary short-term diversions and appropriate measures.</p> <p data-bbox="424 1503 1417 1648">These documents provide an outline of plans to be brought forward to mitigate the impacts on the Traffic and transport network and are secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p data-bbox="424 1671 1445 1962">Given that it is impossible to deliver the Proposed Project without at least some disruption of the traffic and transport networks and that no significant adverse effects are anticipated as a result of the construction phase National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to traffic and transport impacts.</p> |
| Air quality                            | A number of comments were raised which raised issues relating to air quality. These are summarised in Table 8.4, above, and responded to in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|                                        | <p>detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>National Grid acknowledges the potential for impacts on air quality during construction, particularly from dust generating activities. <b>Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality and Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality</b> provide an assessment of impacts of the Proposed Project on air quality.</p> <p><b>Application Document 7.1 Planning Statement</b> confirms that it has been assessed that there will be no significant adverse effects upon air quality during each phase of the Suffolk Onshore Scheme and Kent Onshore Scheme and that effects can be managed to acceptable levels. The Proposed Project therefore accords with NPS EN-1 and local policies relevant to air quality.</p> <p>National Grid considers that the information submitted with the DCO addresses and responds to the issues raised in the Statutory Consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to Air quality impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                  |
| Noise and vibration                    | <p>A number of comments were raised which raised issues relating to noise and vibration impacts. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>An assessment of construction noise impacts has been undertaken and is provided in <b>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration and Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration</b>.</p> <p>The Proposed Project has subsequently been changed to incorporate measures to control noise and vibration, as set out in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice, Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) and Outline Noise and Vibration Management Plans (Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk and Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent</b>.</p> <p>Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p><b>Application Document 7.1 Planning Statement</b> confirms that the Proposed Project has been assessed as according with noise related policies in NPS EN-5 regarding substations and overhead lines.</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| Socio-economic, recreation and tourism | <p>National Grid considers that the information submitted with the DCO application address and responds to the issues raised in the Statutory Consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to noise and vibration impacts.</p> <p>A number of comments were raised which raised issues relating to socio-economic effects. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>A complete assessment of socio-economics effects has been undertaken. This is set out in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b>. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>Further control and management measures have also been included to mitigate any adverse socio-economic, recreation and tourism effects. Such measures which include traffic control measures are set out in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b>.</p> <p>Overall, the Suffolk Onshore Scheme and Kent Onshore Scheme are considered to be in accordance with national policies with regard to the acceptability of socio-economic, recreation and tourism impacts.</p> <p>National Grid therefore considers that the information submitted with the DCO application addresses and responds to the issues raised in the Statutory consultation and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to Socio-economic, recreation and tourism impacts.</p> |
| Health and wellbeing                   | <p>A number of comments were raised which raised issues relating to health and wellbeing effects. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>A complete assessment of health and wellbeing effects has been undertaken. This is set out in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing and Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing</b>. These conclude that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>National Grid considers that the information submitted with the DCO application addresses and responds to address the issues raised in the Statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to Health and wellbeing impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| Inter-project cumulative effects       | <p data-bbox="424 297 1422 450">Significant concerns were expressed regarding the impact of multiple energy projects on similar timescales. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p data-bbox="424 472 1374 613">National Grid has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement.</p> <p data-bbox="424 636 1433 819">National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities (see <b>Application Document 7.10 Coordination Document</b>).</p> <p data-bbox="424 842 1414 949">National Grid considers that the measures included in this document provide an appropriate means of mitigating and controlling cumulative effects of a number of other projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Offshore physical environment          | <p data-bbox="424 990 1442 1245">The potential for adverse impacts on the offshore physical environment were raised in some of the responses received as part of the Statutory Consultation process. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b> and include the impact of the Proposed Project on erosion of the beach from landfall construction as well as potential impact to the Coralline Crag features.</p> <p data-bbox="424 1267 1449 1487">The Kent landfall site is assessed to have low sensitivity to erosion due to its sheltered setting within Pegwell Bay and historically stable beach levels. The sensitivity of the Suffolk landfall coastline is considered to be of high sensitivity reflecting its environmentally designated status and the fact that erosion and beach lowering is already taking place at the landfall site.</p> <p data-bbox="424 1509 1437 1877">The rock bags/concrete mattresses prior to cable pull in are temporary measures and it is assumed that they will be installed with as low a profile as possible, minimising the obstruction to wave and tidal processes to minimize the impact on the coastline. Any rock protection required post installation will be buried at the same location as previous temporary protection and will not protrude from the seafloor. Both coastlines are naturally dynamic settings that are considered to have some capacity to recover from any localised (intertidal) morphological changes associated with the introduction of rock bags/concrete mattresses.</p> <p data-bbox="424 1899 1410 2042">The physical environment impact assessment considers how any alterations to the Coralline Crag Ridges may impact the wider Suffolk coastline, including altering the stability and character of the coastline as far north as Dunwich and as far south as Orford Ness.</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                                        | <p>The Coralline Crag Ridges outcrop is a geologically resistant feature that has a low sensitivity to erosion, however, its significance in determining the hydrodynamics, sediment transport patterns and coastal geomorphology in the region, incurs a higher level of sensitivity (medium – high) that reflects how even moderate alterations to the Ridges may then significantly impact the geomorphology of the coastline.</p> <p>However, whilst the potential for any physical damage to the Coralline Crag feature could result in regional alterations to coastal processes and coastal geomorphology, the magnitude of the impact as a result of the installation of the cable is assessed as being small due to the relatively small area they may be impacted compared to the large extent of the Coralline Crag outcrop. Within <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>, it is noted that the Coralline Crag shoal/outcrop is in close proximity to the west of the break-out point and recommends installation should not create pre-cut trenches at the Coralline Crag due to the sensitivity of the system. Instead, concrete mattresses will be used to protect the cable. Accounting for the recommendations to protect the Coralline Crag Ridges, this results in a minor effect.</p> <p>With the application of the above mitigations to reduce impact, it is not considered that any changes to the Proposed Project are required to make it consistent with national policy and regulations.</p> |
| Benthic ecology                        | <p>A number of responses relating to adverse Benthic Ecology impact were received as part of the Statutory Consultation. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>Following receipt of comments and as part of the iterative design process, the design of the Proposed Project was amended. The Offshore Scheme has been re-routed to completely avoid the Goodwin Sands MCZ, running directly adjacent to the boundary for approximately 3.2 km (<b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>) and will avoid direct impacts on the site, reducing the impacts to the known and potential receptors located within the area, including <i>Mytilus edulis</i> beds (<b>Application Document 6.11 Marine Conservation Zone Assessment</b>).</p> <p>In summary, National Grid considers that no further changes are required to the Proposed Project to further reduce and mitigate impacts on benthic ecology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with NPS EN-1 NPS EN-5 and local planning policy relating to the protection of ecological sites and features.</p>                                                                                                                                                                                                                                                                                        |
| Fish and shellfish ecology             | <p>Concerns over the impact on fish and their associated habitat due to construction of the marine cable were raised in some of the responses received as part of the Statutory Consultation process. These are</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|                                        | <p>summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The potential impact of the Proposed Project on fish is assessed in <b>Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology</b>.</p> <p>The route of the marine cable has been designed to minimise the impact on the sea bed. Pre-installation surveys will be undertaken which will include, as appropriate, the use of drop down video or remotely operated vehicle surveys to confirm the locations and extents of sensitive benthic habitats or features to avoid where possible.</p> <p>The assessment concludes there are no residual significant impacts on fish, therefore in this instance National Grid considers that no further changes are required to the Proposed Project to further reduce and mitigate impacts on benthic ecology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with NPS EN-1 NPS EN-5 and local planning policy relating to the protection of ecological sites and features.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Marine mammals                         | <p>The potential for adverse impacts on Marine Mammals were raised in some of the responses received as part of the Statutory Consultation process. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b> and include in particular the impact of the Proposed Project on seal populations at Pegwell Bay.</p> <p>Seals at Pegwell Bay are known to preferentially haul-out on the sandbanks in the channel of the River Stour at low tide, below line of sight of the main Bay. They are, therefore, sheltered from any noise or activities occurring in the 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, (at least 1,100 m from any 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.</p> <p>Thus, sound propagation modelling, the location of the haul out sites, and the habituation of the seals to very close presence of regular vessel activity in the river and the short duration of activities in Pegwell Bay indicates any disturbance from construction activities is not expected to result in any significant effects.</p> <p>With the application of embedded mitigations including, sensitive routeing and siting of infrastructure and temporary works; and Commitments made within <b>Application Document 7.5.3.2 Appendix B Register of Environmental Actions and Commitments (REAC)</b> it is not considered that any further changes to the Proposed Project are required to make it consistent with national policy and regulations.</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Ornithology                            | <p data-bbox="424 300 1437 555">A number of responses relating to impact on Ornithology were received as part of the Statutory consultation, including impact to migratory birds within the English east coast, particularly potential impact to North Warren Nature reserve, Leiston-Aldeburgh SSSI and Sandlings SPA, and potential impact to Red Throated Diver. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p data-bbox="424 577 1342 651">Following receipt of comments and as part of the iterative design process, the design of the Proposed Project was amended.</p> <p data-bbox="424 674 1453 1111">Careful attention has been paid to this requirement in the design and timing of works close to Leiston-Aldeburgh SSSI in particular. This has included discussions with Natural England, Suffolk County Council, East Suffolk Council, Suffolk Wildlife Trust and RSPB. The impact assessment has been informed by noise modelling, using criteria agreed with Natural England and timing of potentially disturbing works to take place outside the breeding bird season has been built into the programme. In order to minimise impacts on the SSSI the decision has also been taken to traverse it by trenchless techniques rather than open cut trenching, and an assessment of the potential impacts of trenchless methods on the SSSI through interference with surface hydrology have been undertaken.</p> <p data-bbox="424 1133 1417 1317">Construction compound S10 is adjacent to Sandlings SPA, North Warren RSPB Reserve, Leiston-Aldeburgh SSSI. Sandlings SPA is designated for its nesting nightjar and woodlark. These species are either absent (nightjar) or non-breeding (woodlark) from September to February inclusive.</p> <p data-bbox="424 1339 1433 1592">Works that can be scheduled to take place between September and February inclusive are, therefore, unlikely to result in disturbance of nesting nightjar or woodlark. Trenchless compound (S10) set-up is programmed to occur outside the nesting season (March to August). Therefore, no mitigation is needed beyond standard noise fencing. The noise fence would also act as a visual screen, thus protecting birds in the SPA from visual disturbance.</p> <p data-bbox="424 1615 1422 1765"><b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b> sets out the main alternatives considered in relation to the Suffolk Onshore Scheme and the reasons behind the decision to cross Leiston-Aldeburgh SSSI by trenchless technique.</p> <p data-bbox="424 1787 1449 2076">Finally, in regard to the specific issue of Red Throated Diver, <b>Application Document 7.8 Red Throated Diver Protocol</b> has been developed outlining the measures to be implemented to reduce the Proposed Project's impacts on Red Throated Diver, including restrictions on the timings of certain construction activities within the Outer Thames Estuary SPA. National Grid has committed to seasonal restriction advice from Natural England from 01 November-31st March for offshore cable burial activities in the Outer Thames Estuary SPA and</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                                        | <p>a seasonal restriction from 1st January-31st March for landfall cable construction at Suffolk Aldeburgh.</p> <p>In summary, National Grid considers that no further changes are required to the Proposed Project to further reduce and mitigate impacts on ornithology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with NPS EN-1 NPS EN-5 and local planning policy relating to the protection of ecological sites and features.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Marine archaeology                     | <p>The potential for adverse impacts on Marine Archaeology were raised in some of the responses received as part of the Statutory consultation process. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b> and include the impact of the Proposed Project on heritage assets.</p> <p>Following the Statutory consultation exercise the potential for adverse impacts on historic assets has been discussed with the relevant local councils and Historic England.</p> <p>The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or minimise marine archaeological impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project.</p> <p>Additional measures have been included within <b>Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice</b> relevant to the control and management of impacts that could affect marine archaeology receptors.</p> <p>With the implementation of mitigation measures, the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial, which are considered not significant in terms of EIA.</p> <p>Overall, it is not considered therefore, that further changes to the Proposed Project are required to make it consistent with national policy and regulations.</p> |
| Shipping and navigation                | <p>A number of concerns regarding potential for adverse impacts on shipping and Navigation were raised in some of the responses received as part of the Statutory consultation process.</p> <p>Embedded measures have been integral in reducing the shipping and navigation effects of the Proposed Project. Commitments made are within <b>Application Document 7.5.3.2 Appendix B Register of Environmental Actions and Commitments (REAC)</b>.</p> <p>Measures that that have been incorporated are:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                                        | <ul style="list-style-type: none"> <li>• sensitive routing and siting of infrastructure and temporary works;</li> <li>• route design refined to run South of the SUNK Deep water anchorage and north of the W1 buoy, in order to be further from the SUNK Pilot station in accordance with requirement of HHA; and</li> <li>• commitment to producing specific navigation installation plan to ensure safe effective coordination of operations in the area.</li> </ul> <p>With implementation of the changes made to date and mitigation measures outlined above, it is not considered therefore, that further changes to the Proposed Project are required to make it consistent with national policy and regulations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Commercial fisheries                   | <p>Potential for adverse impacts on commercial fisheries, namely impact to fishing grounds and potential cable damage and snagging risk from fishing gear were raised in some of the responses received as part of the Statutory Consultation process. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or minimise commercial fisheries impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project.</p> <p>Mitigation measures are additional topic and site-specific measures that have been applied to mitigate or offset any likely significant effects. These include; minimising the amount of time the cable stays unprotected and exposed to potential interactions with anchoring vessels or fishing gear (anchor drag or gear snagging), during construction; and additional cable burial commitments made within <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>. Furthermore, this ES has concluded that with the additional mitigation, no significant effects on any commercial fisheries receptors are to be expected in UK waters.</p> <p>Considering the mitigation measures outlined above, it is not considered therefore, that further changes to the Proposed Project are required to make it consistent with national policy and regulations.</p> |
| Climate change                         | <p>Concerns about the impacts on the Proposed Project from climate change during the Statutory Consultation. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Issue raised in Statutory consultation  | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Combined effect of the Proposed Project | <p data-bbox="424 297 1445 515">A climate change risk assessment is included within <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b>. This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in Environmental Impact Assessments.</p> <p data-bbox="424 539 1436 680">A separate, more detailed flood risk assessment has been conducted within <b>Application Document 6.8 Flood Risk Assessment</b>. The flood risk assessment involves detailed modelling and assessment, and accounts for the impacts of climate change on flooding.</p> <p data-bbox="424 705 1436 813">National Grid considers that the information submitted with the DCO addresses and responds to climate change issues and does not consider that any further changes are required to the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Alternative solutions                   | <p data-bbox="424 853 1422 994">Some concerns were expressed regarding the impact of the Proposed Project across a range of environmental and social disciplines. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p data-bbox="424 1019 1442 1126">National Grid acknowledges that the Proposed Project has the potential to have adverse impacts across a range of disciplines. A comprehensive ES has been prepared as part of the DCO submission.</p> <p data-bbox="424 1151 1449 1442">A full intra-project cumulative effects assessment has been carried out for the Proposed Project. This assessment considers the potential for multiple impacts to act on single receptors, such as local residents or designated sites. For the Suffolk Onshore Scheme, the full assessment is available within <b>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects</b> and for Kent in <b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects</b>.</p> <p data-bbox="424 1467 1394 1574">National Grid considers that the impacts of the Proposed Project are mitigated and controlled and as such, that no further changes to the Proposed Project are required.</p> <p data-bbox="424 1619 1406 1760">A significant amount of feedback was raised in relation to the need to consider alternative solutions to the Proposed Project. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p data-bbox="424 1785 1442 1926">In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure.</p> <p data-bbox="424 1951 1430 2058">National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                        | <p>It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.</p> <p>This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.</p> <p>National Grid (Sea Link), North Falls (Offshore Wind Farm) and Five Estuaries (Offshore Wind Farm) have been working together to explore the potential for offshore coordination as part of the Offshore Transmission Network Review 'Early Opportunities' workstream. The projects, acting together in a consortium led by North Falls, were awarded funding by the Department of Energy Security and Net Zero through the Offshore Coordination Support Scheme in December 2023.</p> <p>On 28 March 2024, the consortium submitted a high-level feasibility study that formed the first step of the grant funding agreement. The study assessed the feasibility of a coordinated offshore connection specifically: the capital costs; building blocks; construction and commissioning methodologies and overall programme associated with a coordinated solution.</p> <p>The Secretary of State for Energy Security and Net Zero has reviewed this study, amongst other information and has decided not to grant further funding to the consortium. The feasibility study identified that coordination is technically feasible however, it also identified in the feasibility study that there were significant extra costs and the negative impact on the delivery timeline of connecting more renewables to the UK energy system, especially considering the government's commitment to quadruple offshore wind and fully decarbonise the UK's electricity system by 2030.</p> <p>For the reasons detailed in Table 8.4 and <b>Application Document 5.1.6 Appendix E Statutory consultation</b>, National Grid considers that it has addressed the feedback relating to alternative solutions and does not consider that any further changes are required to the Proposed Project.</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Needs case                             | <p>A significant amount of feedback was raised in relation to the needs case for the Proposed Project. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. National Grid's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project.</p> <p>For the reasons detailed in Table 8.4 and <b>Application Document 5.1 Appendix E Statutory consultation</b>, National Grid considers that it has addressed the feedback relating to the needs case and does not consider that any further changes are required to the Proposed Project.</p> |
| Coordination with other projects       | <p>Concerns were raised by respondents that there is a lack of coordination between the Proposed Project and other energy projects in the Suffolk area and that consequently, the cumulative impact is not being adequately assessed or mitigated. These are summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>National Grid has engaged with other project developers, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities, see <b>Application Document 7.10 Coordination Document</b>.</p>                                                                                                                                                                                                                         |
| Safety                                 | <p>During the Statutory consultation process concern was expressed that the Proposed Project is vulnerable to attack/sabotage outside from outside agencies. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>There is no change that National Grid can introduce to the Proposed Project that will entirely remove this threat,</p> <p>However National Grid will liaise 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. National Grid</p>                                                                                                                                                                                                                                                                                            |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Major accidents and disasters          | <p>considers that no further changes were required to address the safety of the Proposed Project.</p> <p>Concern was expressed over the potential impacts from major accidents and disasters. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>If approved, National Grid will follow all relevant health and safety policies to reduce the risk of fire and explosion, and all Proposed Project buildings will be constructed in accordance with buildings regulations which includes consideration of measures needed in the event of a fire or an explosion. National Grid does not consider that the Proposed Project requires any further changes in order to further mitigate and control potential for Major Accidents and Disasters.</p>                           |
| Onshore/offshore EMF                   | <p>Queries were raised during Statutory Consultation regarding the measures that will be put in place regarding electromagnetic fields. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>All of National Grid's electricity equipment is designed to produce EMFs below the limits set by the Government. Details are contained in <b>Application Document 6.5 Electric and Magnetic Field Compliance Report</b>. This concludes that 'All of the proposed onshore Proposed Project cable designs would be fully compliant with the Government policy' and as such National Grid does not consider that any further changes are required to the project in relation to EMF.</p>                                                                                            |
| Community benefits/enhancements        | <p>Concerns were raised during the Statutory consultation that there was consideration for community improvements in the Proposed Project proposals, and several suggestions made for community improvements and enhancement were made. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>National Grid is waiting for confirmation of the Government's position on the provision of community benefits associated with transmission infrastructure, which will inform the Applicant's future approach to the provision of community benefits and enhancements.</p> <p>Therefore, whilst National Grid supports the principle of providing some form of community benefits as part of the Proposed Project it is not possible to formally introduce them at this stage.</p> |
| Timescales/programme                   | <p>Concerns were expressed over the length of the timeframe for the Proposed Project together with other projects in the area; concerns over the cumulative impacts. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Mitigation                             | <p>The construction programme as a whole is estimated to be around four years, however, exact details of the different stages are yet to be confirmed.</p> <p>An indicative construction programme is provided in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. The design-life of the different Proposed Project elements are also provided.</p> <p>Whilst National Grid is confident of the timescales of the Proposed Project, and there are no changes that can be made that will remove the risk to timescales and programme.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Walking, cycling and horse riders      | <p>Concerns were expressed over the whether the appropriate level of mitigation to address the impacts of the Proposed Project would be secured. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The Proposed Project has been through a robust EIA process to establish the baseline environmental condition of the Proposed Project area, which then determines the mitigation that National Grid must put in place.</p> <p>This was then discussed with the relevant statutory advisory services such as Natural England, Historic England and the Environment Agency. With regard to the feedback of the local community described in this report, this has been provided to and read by the environmental specialists who are responsible for determining the mitigation measures to be put in place and is actively being considered within the relevant Management Plans to be provided to the Main Works Contractors'.</p> <p>Mitigation measures are listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>.</p> <p>National Grid is confident in the mitigation that is proposed is appropriate and that no further changes are required to the mitigation that has been included in the Proposed Project.</p> <p>National Grid is rigorously assessing the Proposed Project's impact on footpaths adhering to the "mitigation hierarchy" by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where National Grid has a temporary impact on a PRoW during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided.</p> <p>Impacts on footpaths are considered in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism and Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>. Potential impacts on PRoW and walking and cycling routes including the King</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Land rights and CPO                    | <p>Charles III England Coast Path are also considered within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport</b>.</p> <p>National Grid has submitted <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> which are considered to suitably mitigate the impacts of the Proposed Project on walking, cycling and horse-riders to the extent that no further changes to the Proposed Project are required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Project finance/ cost of scheme        | <p>Concerns were expressed over the impact on landowners and the need to provide compensation. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>National Grid acknowledges that the Proposed Project may cause concern to landowners. Engagement with landowners has continued on the Proposed Project since before non-statutory consultation as is set out in the <b>Application Document 4.2 Statement of Reasons</b> and a number of design changes have resulted from such engagement as set out in Table 8.4 above. However, it is not possible to introduce a change to the Proposed Project that will remove all potential impacts on landowners and National Grid’s will continue to pursue voluntary agreements with affected landowners, and as such does not consider that any changes (further to this approach) are required.</p> <p>Suggestion was made that the Proposed Project is not good for customers and is not financially viable due to the high level of compensation and mitigation required. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The Government and the Regulator (Ofgem) expect National Grid to find a balance when developing proposals, taking account of the duties set out in the Electricity Act 1989 to be efficient, coordinated and economical and to have regard to the desirability of preserving amenity. When looking at the costs of a new connection, National Grid is guided by the laws, policies and regulations that have been set by Government on behalf of electricity consumers and society. National Grid is required through those to balance affordability to the electricity bill payer with the impact of the proposals on the environment. National Grid considers that the Proposed Project strikes a justifiable balance in the context of national policy and National Grid’s statutory duties, which include the need to be economic and efficient. It is for the Government, through the planning process, to confirm whether this balance is right.</p> <p>As such, National Grid does not consider that any further changes to the Proposed Project to address this feedback is necessary.</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| Construction                           | <p>Feedback was received in relation to impacts of the construction of the Proposed Project. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1 Appendix E Statutory consultation</b>.</p> <p>The locations of construction haul roads and compounds have been selected to minimise the impact on the environment wherever possible. During construction, contractors will select locations for construction haul roads and compounds that will minimise the impact on the environment wherever possible. During construction, contractors will be required to adhere to <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> and develop their own task-specific management plans.</p> <p>Available information of the proposed methods and programme of construction is provided in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>. Outline information on the proposed permanent access roads, temporary haul roads and compounds is also provided.</p> <p>Details relating to the proposed construction working hours and any associated restrictions are contained in <b>Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>National Grid considers that the impacts of the Proposed Project are mitigated and controlled and that the submitted information is comprehensive, as such no further changes to the Proposed Project are required.</p> |
| Norwich to Tilbury                     | <p>Suggestions were made that changes were required to the Proposed Project to reduce its scale and to incorporate it into the Norwich to Tilbury Project. This is summarised in Table 8.4, above, and responded to in detail in <b>Application Document 5.1.6 Appendix E Statutory consultation</b>.</p> <p>As set out in Table 8.4, above the Proposed Project is a separate project to Norwich to Tilbury, and it is not possible to incorporate it into the Norwich to Tilbury Project. Therefore, no further changes have been made to the Proposed Project to address this feedback.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

## Approach to Assessment and Proposed Mitigation Measures

- 8.7.14 Throughout the Proposed Project development National Grid has sought views from a range of prescribed bodies, relevant local authorities and statutory undertakers in order to prepare a robust Environmental Impact Assessment.
- 8.7.15 Following receipt of the Statutory consultation responses, National Grid, in accordance with Section 49 of the Planning Act 2008, had regard to the relevant responses received and has provided comments on these within section 24 and 25 **Application Document 5.1.6 Appendix E Statutory consultation**.



- 8.7.16 The approach to assessment and commitment to mitigation measures for a number of disciplines has been informed by the feedback received from consultees, for example:
- Use of a trenchless solution for the proposed cables underneath statutorily designated sites and sensitive saltmarsh habitat;
  - Retention of significant trees and development of ecological protection areas;
  - Avoidance of the breeding season for specific bird species;
  - Increase in the depth of HVDC cables; and
  - Removing some proposed construction access roads from being major routes for construction traffic.

## 8.8 Section 50 Duty to have Regard to the Government's Pre-Application Guidance

- 8.8.1 The advice note Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, was published 16 May 2024, the part of the guidance headed "Duty to have regard to the government's pre-application guidance (section 50)" states
- 8.8.2 *"The report should provide evidence that demonstrates how the applicant has had regard to the government's guidance on the Pre-application stage. The report should illustrate how the relevant guidance has been followed. If the applicant has diverged from the guidance this should be explained and justified."*
- 8.8.3 The Proposed Project had already completed non-statutory and statutory consultation before the new advice was published. National Grid met with the Planning Inspectorate on 10 September 2024 and they accepted National Grid's programme does not allow it to follow the guidance in full due to the maturity of the Proposed Project. National Grid consider the consultation carried out to date has been adequate, as set out in this report **Application Document 5.1 Consultation Report**.

## 8.9 Section 51 Demonstrating Regard to Pre-Application Advice

- 8.9.1 The advice note Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, was published 16 May 2024, section 51 states:
- 8.9.2 *"The applicant's consultation report should include evidence which demonstrates how they have had regard to the section 51 pre-application advice from the Planning Inspectorate and advice from the other statutory consultees which provide advice on behalf of the government."*
- 8.9.3 *Provision of this evidence will:*
- *support the applicant's case to demonstrate that they have complied with the requirements of Part 5, Chapter 2 of the Planning Act*
  - *give confidence to stakeholders that the applicant has considered the statutory advice received and made all reasonable efforts to submit a well prepared application*
  - *There is no prescribed format for providing this evidence however it may be best presented in a table appended to the consultation report."*

## Primary Service Features

8.9.4 The Pre-application advice states:

*“Across all three tiers of pre-application service, all applicants are expected to engage the following five primary service features. We consider that these features are fundamental general requirements for improved service, certainty and outcomes:*

- *Programme Document*
- *Issues Tracker and Potential Main Issues for the Examination*
- *Advice Log*
- *Adequacy of Consultation Milestone (AoCM)*
- *Demonstrating regard to advice”*

8.9.5 As stated in paragraph 8.8.3 the Proposed Project had already completed non-statutory and statutory consultation when this guidance was published in May 2024. National Grid met with the Planning Inspectorate on 10 September 2024 and as documented in the published minutes, they accepted National Grid’s programme does not allow it to follow the guidance in full due to maturity of the Proposed Project.

8.9.6 National Grid submitted a formal response to the Planning Inspectorate on 12 February 2025 giving regard to the five primary services and explaining not all the five primary services will be submitted or fully undertaken, see table 8.7 below.



Table 8.7 Regard Had Primary Service Feature

| Primary Service Feature | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | National Grid Regard Had Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Programme Document      | <p>The production and maintenance, by the applicant, of a pre-application Programme Document setting out the main steps that the applicant anticipates taking during the preparation of the application. This document will be introduced by the applicant at the Inception Meeting and its development and maintenance monitored by the Inspectorate throughout the pre-application stage. A public version of the pre-application Programme Document must be published on the applicant's website.</p> <p>Updates to the pre-application Programme Document should be communicated by the applicant proactively, with a clear description of the potential impacts on the requested services of the Inspectorate, relevant statutory bodies, local authorities and other stakeholders provided. A reliable view of programmes across the NSIP portfolio is essential to enable these actors to resource and support the pre-application service effectively. In preparing and making updates to the pre-application Programme Document, we expect applicants to be responsive and reasonable in tailoring programmes to support the engagement of statutory bodies and local authorities where required.</p> | <p>At the point at which the guidance and prospectus came forward (May 2024), the proposed project had already completed two phases of project-wide pre-application consultation.</p> <p>National Grid submitted the inaugural draft Programme Document to PINS in August 2024 and comments were received back from PINS in September 2024.</p> <p>The Programme Document (see section 20 of <b>Application Document 5.1.7 Appendix F Targeted consultation</b>) has been updated and published on our Proposed Project dedicated website February 2025.</p> <p>National Grid intends to make its application for development consent in Q1 2025.</p> |
| Issues Tracker          | <p>The production and maintenance, by the applicant, of an Issues Tracker throughout the pre-application stage. The expectation is for applicants to be upfront about issues and who they affect. The Issues Tracker should be made available for regular review by the Inspectorate, affected statutory bodies and local authorities in order to encourage</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>Due to the maturity of the engagement undertaken to date, an issues tracker of the nature referred to in the guidance has not been prepared, National Grid has nevertheless engaged in an extensive and ongoing programme of pre-application engagement with relevant statutory bodies and local authorities.</p>                                                                                                                                                                                                                                                                                                                                  |

dialogue and, where possible, achieve resolution. The degree of risk associated with each issue identified in the tracker should be allocated a 'RAG' (red, amber, green) status. The Issues Tracker may be sustained into post-submission stages subject to the discretion of the appointed Examining Authority.

The issues tracking process will culminate in a list of Potential Main Issues for the Examination (PMIE) which will be entered into the examination as an application document. The PMIE should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. It is entirely separate from the later Initial Assessment of Principal Issues (IAP) developed by the appointed Examining Authority, but may, per any evidence within the application documentation, influence the content of the IAP. The function of the PMIE (along with PADSS) is to demonstrate that there are sufficiently few and uncomplex residual issues to potentially allow for a four-month examination to be timetabled (in Fast Track procedure cases) and/ or to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. In the enhanced tier service, a multiparty meeting may be convened by the applicant to assist finalisation of the PMIE.

Development of the Proposed Project has involved engagement with a wide range of stakeholders including statutory/prescribed consultees, local communities and their elected representatives, landowners and specialist interest groups. These stakeholders have differing interests that require different levels of consultation, but the engagement has been based on the following core principles:

- Early and ongoing engagement to inform and influence the design process;
- Seeking feedback through the iterative design process and taking this feedback into consideration;
- Building long-term relationships with key stakeholders throughout the different stages of the project to help better understand their views;
- Where possible and practicable, ensuring concerns and issues are addressed; and
- Ensuring appropriate statutory consultation is undertaken in compliance with requirements, see **Application Document 5.1.1 Annex 1 Consultation compliance checklist**.

The project commenced engagement activities in 2020 when initial meetings with local planning authorities in Suffolk and Kent, the Environment Agency, Natural England, and the Marine Management Organisation were held. These meetings focused on identifying appropriate

study areas and identifying and appraising corridor and siting options.

This continued through into the summer of 2021, when project-specific marine surveys (geophysical, geotechnical and environmental) were undertaken. Marine stakeholders were engaged at this stage to discuss the emerging landfall and routeing preferences in the marine environment, ensuring any feedback that may influence route selection/ optimisation could be taken into consideration prior to surveys starting. Stakeholders involved included the MMO, Historic England (marine) and the Crown Estate.

Since this early engagement there has been continued stakeholder engagement undertaken with key stakeholders and Local Planning Authorities throughout the project as well as the main consultation periods (2022, 2023 and 2024). The purpose of this engagement has been to continually seek feedback in order to inform the emerging design and associated environmental assessments. A list of the engagement meetings and thematic meetings that have occurred to date and further detail of the general ongoing engagement will be found in the following Application Documents:

- **Application Document 5.1 Consultation Report** (this report);
- Statements of Common Ground, see paragraph 3.4.23 of this report and **Application Documents 7.4.1 – 7.4.15 Statement of Common Ground**;

- **Application Document 7.4 Statement of Commonality.**

In order to assist the Inspectorate to identify the main issues and who the Proposed Project will affect, the Applicant is to submit a number of draft Statements of Common Ground with Statutory Undertakers and Host Authorities with the DCO Submission. The Statements of Common Ground (SoCG) have been prepared to identify matters agreed and matters currently outstanding between certain stakeholders. They set out the agreed position and identify any remaining matters of difference or in dispute the relevant body. The SoCGs will be progressed during the pre-examination and examination stages. A Statement of Commonality will be submitted with the DCO application and will provide an overview of the position of each SoCG.

Advice Log      Engagement in the Inspectorate’s production of an Advice Log to replace meeting notes as a record of interactions between us and the applicant. Trials of the Advice Log approach have proved it to be an effective mechanism to streamline the way in which we record advice and free-up resources (both internal and external) to deal with other elements of the pre-application process which focus on improving the quality of the emerging application. The Advice Log is owned and maintained by the Inspectorate. After each meeting with the applicant, we will seek comments on drafting within the Advice Log from the applicant prior to publication on Find a National Infrastructure Project. The applicant will use the Advice Log

The Section 51 Advice Log for advice provided by PINS after November 2024 is available on the PINS project website.

Prior to this date, notes of the regular meetings held with PINS and Section 51 advice provided is available in the form of meeting notes; also available on the PINS project website. Together these documents record all advice provided by PINS since the first meeting held between PINS and National Grid on the project in November 2021.

| Primary Service Feature            | Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | National Grid Regard Had Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | as the basis for demonstrating regard to section 51 advice within the application (see 5, below).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Adequacy of Consultation Milestone | <p>Engagement in a pre-submission Adequacy of Consultation Milestone (AoCM) intended to allow early consideration of the adequacy of consultation undertaken by the applicant and minimise risk at the acceptance stage. The AoCM should be programmed to occur early enough to enable applicants to consider how to undertake any additional engagement that may be needed, but sufficiently towards the end of the pre-application stage to assess the adequacy of the consultation that has been done. To inform the AoCM, the applicant will make a written submission to the Inspectorate which establishes the consultation undertaken to date, confirms the approaches set out in the Statement of Community Consultation, and summarises the consultation responses and the way in which they are shaping the application. Importantly, it should include the views and any relevant supporting material from local authorities if available. The written submission will be published on the relevant project page on Find a National Infrastructure Project.</p> <p>The AoCM and associated activities will be established in the applicant's pre-application Programme Document. In the enhanced tier service, where requested and required, an additional multiparty meeting, chaired/ facilitated by the Inspectorate, will be made available to discuss the AoCM submission including the views from local authorities.</p> | <p>AoCM documentation is not being prepared as the Consultation Report (this report) contains all detail around the consultation process.</p> <p>National Grid notes that the pre-application guidance refers to the AoCM as being an informal stage, comprising a statement comparing what has occurred to the Programme Document and SoCC.</p> <p>After discussion with PINS in the September 2024 meeting, the PINS post meeting note stated:</p> <p><i>"Where the Applicant's programme does not allow for the submission of the AoCM then this should be fully explained in the submission including why the Applicant considers that consultation carried out to date has been adequate".</i></p> <p>As set out in Chapters 5, 8, 9 and 10 of this Consultation Report, National Grid has carried out extensive consultation exercises on the Proposed Project and considers that the consultation carried out to date has been adequate.</p> |
| Demonstrating regard to Advice     | The production of evidence, presented within the Consultation Report accompanying the submitted application, demonstrating the applicant's regard to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | This report <b>Application Document 5.1 Consultation Report</b> has included regard had to all responses received throughout the process of consultation. Table                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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**Primary Service Requirement Feature**

**National Grid Regard Had Response**

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advice that the Inspectorate and affected statutory bodies have issued during the pre-application stage. This should highlight amendments to the application arising from advice received, and similarly provide justification where advice received has not led to an amendment to the application. This new requirement is expected to give rise to better evidence to support the applicant's case for compliance with Part 5, Chapter 2 of the PA2008, and give better confidence to the stakeholder system that the applicant has taken account of the statutory advice received and made reasonable efforts to submit an application that is in an optimised condition for post-submission stages, including the examination.

8.4, Table 9.10 and Table 10.4 of this Consultation Report provide themed summaries of the responses to Statutory consultation, Targeted consultation and Pre-submission engagement respectively. These tables indicate where the feedback has led to a design change.

**Application Document 7.3 Design Development Report** will be submitted with the DCO application. This provides an overview of the design rationale for the Proposed Project. It outlines how the design process was conducted and how the proposed design has evolved and where different design were considered. It provides the reasons why the favoured choice has been selected.

The report also explains where design choices have sought from feedback to reduce the environmental effects of the project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects wherever practicable.

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- 8.9.7 On 12 July 2024 National Grid submitted the following draft Development Consent Order submission documents following discussions with the Planning Inspectorate:
- Draft Development Consent Order
  - Project Description
  - Works Plans
  - Land Plans
  - Explanatory Memorandum
  - Habitats Regulations Assessment
  - Consultation Report
- 8.9.8 National Grid also issued the draft DCO submission documents to the following statutory consultees for pre-application advice:
- Dover District Council;
  - East Suffolk Council;
  - Kent County Council;
  - MMO;
  - Natural England;
  - Suffolk County Council; and
  - Thanet District Council.
- 8.9.9 Table 9.8 demonstrates the regard had to the comments received from the Planning Inspectorate and statutory consultees on the draft submission documents.



Table 8.8 Regard had to pre-application advice

| Organisation / Statutory Consultee | Draft document name                    | Summary of advice                                                                                                                | Regard had to pre-application advice (s51)                                                                                                                                                                                                              |
|------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Planning Inspectorate          | Draft Development Consent Order (dDCO) | It was commented that a number of the template schedules were blank and that cross referencing should be checked.                | Early drafts were sent for pre-engagement review and these issues have now been addressed in the submission version of the draft Development Consent Order (dDCO), see <b>Application Document 3.1 draft Development Consent Order</b> .                |
|                                    |                                        | Reference should be made to the specific section of the Planning Act 2008 which the development meets to be considered a NSIP.   | Reference to the project being directed into the Planning Act 2008 regime by virtue of a Section 35 Direction is included in the dDCO see <b>Application Document 3.1 draft Development Consent Order</b> .                                             |
|                                    | Project Description                    | Cross referencing should be checked across all application documents.                                                            | Cross referencing across all application documents has been undertaken for the submission documents.                                                                                                                                                    |
|                                    |                                        | The draft version of the Project Description is very brief.                                                                      | A detailed Project Description is included in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Project</b> .                                                                                                            |
|                                    | Works Plans                            | Information is missing from the draft Works Plans including the North mark on the plans and square brackets missing information. | Early drafts were sent for pre-engagement and these issues have now been addressed in the submission version of the Works Plans, see <b>Application Documents 2.5.1 Work Plans – Suffolk, 2.5.2 Work Plans – Kent and 2.5.3 Work Plans - Offshore</b> . |
|                                    |                                        | Not all Works Plan numbers included within a sheet are shown on the legend.                                                      |                                                                                                                                                                                                                                                         |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                     | Regard had to pre-application advice (s51)                                                                                                                                                                                                    |
|------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | Lands Plans                     | <p>All PROW routes should be included and shown clearly.</p> <p>Only some of the sheets were provided so complete checks were not possible.</p>                                                                                                                       | <p>Early drafts were sent for pre-engagement and these issues have now been addressed in the submission version of the Lands Plans, see <b>Application Documents 2.3.1 Land Plans – Suffolk, 2.3.2 Land Plans.</b></p>                        |
|                                    | Explanatory Memorandum          | <p>A list of abbreviations and acronyms should be included within the application.</p>                                                                                                                                                                                | <p>A list of abbreviations and acronyms is included within the application, see <b>Application Document 1.6 Glossaries &amp; Acronyms.</b></p>                                                                                                |
|                                    |                                 | <p>Cross referencing should be checked across the application documents.</p> <p>There a number of square brackets missing information.</p>                                                                                                                            | <p>An early draft of the Explanatory Memorandum was sent for pre-engagement and these issues have now been addressed in the submission version of the Explanatory Memorandum, see <b>Application Document 3.2 Explanatory Memorandum.</b></p> |
|                                    |                                 | <p>Specific sections of the Planning Act 2008 should be included which state that the proposed development meets the test to be considered a NSIP.</p>                                                                                                                | <p>Reference to the project being directed into the Planning Act 2008 regime by virtue of a Section 35 Direction is included in the Explanatory Memorandum, see <b>Application Document 3.2 Explanatory Memorandum.</b></p>                   |
|                                    | Habitats Regulations Assessment | <p>Cross referencing of the Project Description should be checked across the application documents.</p>                                                                                                                                                               | <p>Cross referencing across all application documents has been undertaken for the submission documents.</p>                                                                                                                                   |
|                                    |                                 | <p>The Applicant should ensure the HRA Screening information provided with the DCO application is up to date and reflective of the proposed development sought through the dDCO, noting that this may have changed since the drafting of the PIER. The HRA Report</p> | <p>This has been included in the HRA submitted with the application, see <b>Application Document 6.6 Habitats Regulations Assessment Report.</b></p>                                                                                          |

| Organisation /<br>Statutory Consultee | Draft document<br>name | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Regard had to pre-application advice<br>(s51)                                                                                                                                                                                                                                                             |
|---------------------------------------|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |                        | should clearly explain the outcomes of the HRA screening stage.                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                           |
|                                       |                        | The favourable condition of the sites should also be included for each site.                                                                                                                                                                                                                                                                                                                                                                                                                         | Favourable condition information is not published for European sites; that information is published for SSSIs but Natural England usually advises us not to use it because the interest features of SSSIs (and their condition) do not necessarily translate to the European sites within which they lie. |
|                                       |                        | The Inspectorate notes the statement that “It is considered that as for the PEIR HRA this can be screened out since pollution control measures can be taken into account at the HRA screening stage.” The Applicant should ensure that such measures are integral or incorporated within the DCO application and are not intended to avoid or reduce the effects on any European site where being considered at the HRA Screening stage. Applicants are encouraged to take a precautionary approach. | This has been addressed in the HRA (see <b>Application Document 6.6 Habitats Regulations Assessment Report</b> ) submitted with the application.                                                                                                                                                          |
|                                       |                        | Reference to offsetting habitats is noted, for example paragraph 4.1.1 states “Proposals for creating approximately 6ha of acid grassland to offset the temporary loss are being developed and will be discussed in this section.” The Applicant is requested to clarify whether these proposals set out are mitigation or compensation and whether the land for which the loss is occurring is in the boundary of the                                                                               | This has been addressed in the HRA (see <b>Application Document 6.6 Habitats Regulations Assessment Report</b> ) submitted with the application.                                                                                                                                                          |

| Organisation / Statutory Consultee | Draft document name | Summary of advice                                                                                                                                                                                                                                                         | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                      |
|------------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                     | Proposed Development or functionally linked land.                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                 |
|                                    |                     | It is recommended that outline versions of management plans are provided with the DCO application. It is also helpful for a route map to be provided illustrating the mitigation and compensation secured, through which plan and where this is secured in the draft DCO. | Outline versions of management plans are provided with the dDCO (see <b>Application Document 3.1 draft Development Consent Order</b> ) and reference to where mitigation is secured is included within the draft documents submitted with the application.                                      |
|                                    |                     | It is advised that that the Applicant seek to agree the projects to be included in the in-combination assessment with relevant consultation bodies.                                                                                                                       | The list of plans and projects was consulted on at PEIR stage and a complete draft of the HRA has been shared with Natural England prior to DCO submission.                                                                                                                                     |
| Consultation Report                |                     | Cross-referencing within Annex 1 of the Consultation Report needs to be undertaken.                                                                                                                                                                                       | An early draft of the Consultation Report was sent to the Inspectorate for pre-engagement and cross-referencing has now been addressed in the submission version of the Consultation Report, <b>Application Document 5.1 Consultation Report</b> .                                              |
|                                    |                     | A number of the appendices or other documents referred to in the draft of the Consultation Report shared with the Inspectorate as part of the pre-engagement were not provided so the Inspectorate has not been able to comment.                                          | These appendices and have been included in the Consultation Report ( <b>Application Document 5.1 Consultation Report</b> ) and the other documents including the Statement of Reasons (see <b>Application Document 4.2 Statement of Reasons</b> ) have been submitted with the DCO application. |
|                                    |                     | Information provided in the draft Consultation Report on how the Applicant has met the                                                                                                                                                                                    | An early draft of the Consultation Report was sent for pre-engagement and full                                                                                                                                                                                                                  |

| Organisation /<br>Statutory Consultee | Draft document<br>name                 | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                  | Regard had to pre-application advice<br>(s51)                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |                                        | requirements of section 49 of the PA2008 (duty to take account of the responses to consultation and publicity) is very limited. Please ensure that full demonstration is included when submitting the application to how the Applicant's consultation has met all the requirements of section 49.                                                                                                  | demonstration as to how National Grid has met the requirements of section 49 have been included in the submission version of the Consultation Report see, section 24 and 25 of <b>Application Document 5.1.7 Appendix E Statutory Consultation</b> , section 17 and 18 of <b>Application Document 5.1.8 Appendix F Targeted Consultation</b> and section 10.5 of <b>Application Document 5.1 Consultation Report</b> , this report. |
|                                       |                                        | Different periods of consultation should be fully and clearly defined within the submitted Consultation Report.                                                                                                                                                                                                                                                                                    | Different periods of consultation are clearly addressed in separate chapters of the submission version of the Consultation Report, see <b>Application Document 5.1 Consultation Report</b> , this report.                                                                                                                                                                                                                           |
| Dover District Council                | Draft Development Consent Order (dDCO) | Dover Council raised a number of comments in relation to the dDCO in respect of the following topics: <ul style="list-style-type: none"> <li>(1) Schedule 1 description of the Authorised Project; and</li> <li>(2) Schedule 3 Requirements including in relation to local authority boundaries and discharge requirements; management plans; construction hours and contaminated land.</li> </ul> | National Grid has had regard to the comments received from Dover District Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> .                                                                                                                     |
|                                       | Works Plans                            | The Council looks forward to seeing further detail on the works further south of Sheet 3 of the Works Plans.                                                                                                                                                                                                                                                                                       | The Works Plans submitted with the DCO application (see <b>Application Documents 2.5.1 Work Plans – Suffolk, 2.5.2 Work Plans – Kent and 2.5.3 Work Plans –</b>                                                                                                                                                                                                                                                                     |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | Habitats Regulations Assessment | Section 3.4.2 is currently expected to confirm that there will be no direct habitat loss from any European sites and therefore no likely significant effect will arise". However, from document 2.3.2: Land Plans – Kent, there are areas within the intertidal zone of the Thanet Coast & Sandwich Bay SPA / Ramsar marked as being for access and for 'temporary use for construction, mitigation, maintenance and dismantling of redundant infrastructure'. The SNEO considers that even if these areas are identified as for potential use, there still needs to be consideration in the HRA of the type, scale and duration of the potential use, and any temporary or long-term impacts on the SPA / Ramsar site. | <p><b>Offshore</b>) show all elements of the works included in the Proposed Development.</p> <p>The temporary use of the areas within the intertidal zone of the Thanet Coast &amp; Sandwich Bay SPA/Ramsar in relation to any potential temporary long-term effects on the SPA/Ramsar have been fully addressed and considered in the HRA (see <b>Application Document 6.6 Habitats Regulations Assessment Report</b>) submitted with the DCO application.</p> |
| East Suffolk Council               | Draft Development Consent Order | <p>East Suffolk Council raised a number of comments in relation to the dDCO in respect of the following topics:</p> <ul style="list-style-type: none"> <li>(1) Articles of the dDco including in relation to the definitions; the extent and nature of the pre-commencement operations; limits of deviation; protective works; felling of trees; safeguarding and amendments to local legislation;</li> <li>(2) Schedule 1 description of the Authorised Project;</li> <li>(3) Schedule 3 Requirements including in relation to definitions; BNG: approval</li> </ul>                                                                                                                                                   | National Grid has had regard to the comments received from East Suffolk Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> .                                                                                                                                                   |

| Organisation / Statutory Consultee | Draft document name | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Regard had to pre-application advice (s51)                                                                                                                                                                                                                    |
|------------------------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                     | <p>process for and extent of management plans and converter station design; construction hours and reinstatement requirements;</p> <p>(4) Schedule 4 Discharge of Requirements including timescales for discharge; ability to consult with other bodies and fees</p>                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                               |
| Explanatory Memorandum             |                     | <p>As stated in the comments on the dDCO, East Suffolk Council does not consider that 28 days is an appropriate timescale for determination of the discharge of requirements, ESC notes that paragraph 4.3.5 of the Ex Memo states that there is provision for alternative periods of time to be agreed on a case-by-case basis with the relevant LPA but ESC considers that the period should be increased from 28 to 56 days in all cases and then retain the ability to agree a different period with different LPAs.</p> <p>Further discussion on the appropriate scope and wording of the pre-commencement operations is required in line with comments made on the dDCO.</p> | National Grid has had regard to the comments received from East Suffolk Council in relation to the draft Explanatory Memorandum and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation.</b> |
| Habitats Regulations Assessment    |                     | <p>What scoping distance has been used for European designated sites for the Stage 1 assessment? Also, there seems to be designated sites which overlap with those listed which are not included in Section 2 (e.g. the Minsmere-Walberswick Heaths and Marshes SAC and the Alde, Ore and Butley Estuaries SAC).</p>                                                                                                                                                                                                                                                                                                                                                               | All of these issues are addressed in the HRA (see <b>Application Document 6.6 Habitats Regulations Assessment Report</b> ) submitted as part of the DCO application.                                                                                          |



| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                           | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                   |
|------------------------------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                 | <p>Section 3.2 will also need to consider the identified impact pathways on the sites currently missing from the list.</p> <p>Paragraph 4.1.1 – is North Warren used by species which are part of the Alde-Ore or Minsmere designated sites populations? If it is then potential for disturbance of these will need to be considered in the assessment.</p> |                                                                                                                                                                                                                                                                                                              |
|                                    |                                 | Section 5.2 – ESC would like clarification on whether Sizewell C should be included as part of the onshore in-combination assessment like it is for the offshore assessment (e.g. Sizewell C recreational impacts on the Sandlings SPA?)?                                                                                                                   | Sizewell C is already consented and preparatory works are already being undertaken. It is very likely to already be under construction before Sea Link is consented. Therefore, it is not envisaged to consider 'in combination' effects.                                                                    |
| Kent County Council                | Draft Development Consent Order | <p>Kent County Council raised a number of comments in relation to the dDCO in respect of the following topics:</p> <p>(1) Articles of the dDco including in relation to the PROW Article and temporary stopping up and diversion; timescale for an application for consent to discharge to a watercourse and flood risk.</p>                                | National Grid has had regard to the comments received from Kent County Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> . |
|                                    | Land Plans                      | All PROW routes should be included and shown clearly and correctly as requested.                                                                                                                                                                                                                                                                            | All PROW routes are shown on <b>Application Document 2.7.2 Access, Rights of Way and Public Rights of Navigation Plans - Kent</b> . As per Regulation 5(2) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, PROWs are not part of                             |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                                              |
|------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | the information required to be shown on the Lands Plans.                                                                                                                                                                                                                                                                                |
|                                    | Explanatory Memorandum          | Updates need to be made to the Ex Memo to reflect whether diversions are temporary or permanent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | This has been noted by National Grid and the appropriate updates have been made where required.                                                                                                                                                                                                                                         |
|                                    |                                 | When considering alternative routes and “like for like”, user safety must be the priority together with no adverse impact on user amenity                                                                                                                                                                                                                                                                                                                                                                                                                           | This has been noted and observed by National Grid where appropriate.                                                                                                                                                                                                                                                                    |
| MMO                                | Draft Development Consent Order | <p>The MMO raised a number of comments in relation to the draft deemed marine licence included in the dDCO at Schedule 15 respect of the following topics:</p> <p>(1) the project should be divided into phases with corresponding conditions specified for each phase;</p> <p>(2) the DML should reference cable burial depth, maximum cable protection and dredge quantity;</p> <p>(3) provide additional information for the RTD condition, specifically relating to date;</p> <p>(4) all conditions should be enforceable and therefore include timescales;</p> | National Grid has had regard to the comments received from the MMO in relation to Schedule 15 (deemed marine licence) of the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> . |
|                                    |                                 | (5) the referencing of legislations should be reviewed carefully; ensure that the wording of conditions aligns with the MMO’s standard wording for DML conditions                                                                                                                                                                                                                                                                                                                                                                                                   | There is no need for a condition to be contained in the DML and this position is supported by the evidence contained in <b>Application Document Volume 6</b>                                                                                                                                                                            |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                       |
|------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                 | It is unclear whether conditions for Sandel and Herring protection are necessary without the ES. This will need to be reviewed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Environmental Statement</b> submitted with the DCO application.                                                                                                                                                                                                                                               |
| Natural England                    | Draft Development Consent Order | <p>Natural England raised a number of comments in relation to the draft deemed marine licence included in the dDCO at Schedule 15 respect of the following topics:</p> <ol style="list-style-type: none"> <li>(1) the definition of commence combined with the extent of the definition of offshore preparation works;</li> <li>(2) Inclusion of a draft outline offshore operations and maintenance plans with the application, similar to offshore wind farm applications;</li> <li>(3) Noting that some conditions are still incomplete and will be updated for submission of the draft DML;</li> <li>(4) Expectation that a micro-siting report will be provided citing requirements to avoid both historical and ecological concerns as is standard for offshore cables;</li> <li>(5) Noting that the condition relating to the cable protection plan needs to be amended to make it clear that no cable protection may be deployed in new areas 10 years after construction;</li> <li>(6) Noting that the condition relating to the restriction of activities during the Red Throated Diver overwintering period of 1 November to 31 March needs to include pre lay grapnel runs as restricted activities;</li> </ol> | National Grid has had regard to the comments received from Natural England Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> . |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                     |
|------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                 | (7) Noting that no condition has been included which limits the intertidal installation to only HDD or non-open cut techniques and this should be secured through explicit condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                |
|                                    | Habitats Regulations Assessment | A note would be welcomed to state that operational noise of the Kent Converter Station will be covered as requested.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Operational noise of the Kent Converter Station is fully addressed in the HRA, <b>Application Document 6.6 Habitats Regulations Assessment Report.</b>                                                                                                                                                         |
| Suffolk County Council             | Draft Development Consent Order | <p>Suffolk County Council raised a number of comments in relation to the dDCO in respect of the following topics:</p> <ul style="list-style-type: none"> <li>(1) Articles of the dDCO including in relation to the definitions; the extent and nature of the pre-commencement operations; limits of deviation; timescales for issuing approvals in relation to applications for street works; certified documents; felling of trees; protection of trees and hedgerows; TPOs; approval processes and amendments to local legislation;</li> <li>(2) Schedule 1 description of the Authorised Project;</li> <li>(3) Schedule 3 Requirements including in relation to definitions; approval process for management plans; construction hours; monitoring and maintenance of management plans; reinstatement; discharge of highways approvals; and archaeology</li> </ul> | National Grid has had regard to the comments received from Suffolk County Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation.</b> |

| Organisation / Statutory Consultee | Draft document name             | Summary of advice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Regard had to pre-application advice (s51)                                                                                                                                                                                                                                                                       |
|------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                 | <ul style="list-style-type: none"> <li>(4) Schedule 4 Discharge of Requirements including timescales for discharge;</li> <li>(5) Schedules 5 and 6 Management Plans including approval process; and</li> <li>(6) Schedule 13 TPOs</li> </ul>                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                  |
|                                    | Project Description             | The description omits mention of the proposed permanent access road with bridge to access the converter station site in Saxmundham.                                                                                                                                                                                                                                                                                                                                                                                                                       | A full description is included within the application documents submitted with the DCO application.                                                                                                                                                                                                              |
| Thanet District Council            | Draft Development Consent Order | <p>Thanet District Council raised a number of comments in relation to the dDCO in respect of the following topics:</p> <ul style="list-style-type: none"> <li>(1) Schedule 3 Requirements including in respect of the need for restriction on development until approvals of details of siting, design and external appearance; for the converter stations; management plans; construction hours and reinstatement requirements; and</li> <li>(2) Schedule 4 Discharge of Requirements in respect of timescales for discharge of requirements.</li> </ul> | National Grid has had regard to the comments received from Thanet District Council in relation to the dDCO (see <b>Application Document 3.1 Draft Development Consent Order</b> ) and a detailed response to those comments, see section 20 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> . |

## 8.10 Conclusion

- 8.10.1 Following the Statutory consultation, National Grid has had regard to the relevant responses received in accordance with Section 49 of the Planning Act 2008. Extracts of the relevant responses received and National Grid's detailed comments on these are contained within sections 24 and 25 of **Application Document 5.1.6 Appendix E Statutory consultation**.

## 9. 2024 Targeted Consultation

### 9.1 Introduction

- 9.1.1 Through ongoing engineering review, further technical and environmental assessments and development of the Proposed Project alongside review of feedback received from the Statutory consultation held between 24 October 2023 and 18 December 2023, several refinements were made, these include:
- in Suffolk, the changes include an alteration to the cable route north of Aldeburgh, confirmation of the proposed access route to the converter station and changes to this access route and the associated bridge over the River Fromus. Various changes to construction and maintenance access routes, compounds, and temporary overhead line diversions are also proposed, and National Grid have identified additional land for environmental mitigation and enhancement. The strategy for coordination with other projects has also evolved;
  - offshore, the proposed changes include refinements to the cable route, additional marine areas for construction vessel manoeuvring, and changes to the approach for backfilling marine trenches;
  - in Kent, the proposed changes include an increase of the overall maximum height of the converter station, confirmation of the type of pylon National Grid intend to use for the connection to the existing overhead line and identifying a further construction and maintenance access route off Sandwich Road via the former hoverport. Various other changes are proposed to construction and maintenance access routes, compounds, and temporary overhead line diversions, and it has identified additional land for environmental mitigation and enhancement.
- 9.1.2 A range of smaller changes to the Proposed Proposals were also made, including various alterations, reductions and increases to the Order Limits. Further detail on the construction methodology was provided, including changes to planned working hours.
- 9.1.3 Table 8.5 in the previous chapter sets out the changes to the Proposed Project for both the Suffolk and Kent Onshore Schemes and the Offshore Scheme.
- 9.1.4 It is of note that following Targeted consultation, National Grid made some further changes to the Proposed Project and these are described in Chapter 10 of this report.

### 9.2 The Approach to Targeted Consultation

- 9.2.1 In light of the above, National Grid considered how best to consult upon the refinements.
- 9.2.2 Paragraph 20 of the April 2024 ‘Guidance on the pre-application stage for Nationally Significant Infrastructure Projects’ states:

*‘For any material change to a part of the proposed application where the project as a whole is not fundamentally change....., a bespoke and targeted approach to further consultation can be adopted, which can address the specific consultation obligations arising proportionately.’*



- 9.2.3 Given the nature of the refinements, and in the context of the , National Grid did not consider that the 'proposed application changes [had changed] to such a large degree that the proposals could be considered a material and substantial change, nor that its environmental impacts were materially worse
- 9.2.4 The targeted consultation was conducted in accordance with the principles of the Planning Act 2008 (PA 2008) and in accordance with the Department for Communities and Local Government's (DCLG) Guidance (The PA 2008: Guidance on the pre application process). The legal requirements of section 42 were complied with (and section 47 and section 48 notices were published) as were the requirements of the Environmental Impact Assessment (EIA) regulations in respect of the provision of Preliminary Environmental Information.
- 9.2.5 National Grid considered all stakeholders should have the opportunity to provide feedback on the proposals regardless of whether they provided feedback in the earlier Non-statutory consultation or Statutory consultation. Therefore, the Targeted consultation was open to anyone interested in the Proposed Project to provide their feedback. Targeted consultation was held from 08 July 2024 to 11 August 2024.

## Section 42(1)(a): Identification of Prescribed Bodies

- 9.2.6 Letters were sent to Section 42(1)(a) bodies on 05 July 2024 containing a copy of the Proposed Project Community Newsletter (see section 2 of **Application Document 5.1.7 Appendix F Targeted consultation**) and a copy of the Section 48 notice (see section 3 of **Application Document 5.1.7 Appendix F Targeted consultation**). Email notifications were sent on 08 July 2024 and also contained the Community Newsletter and Section 48 notice. The letter is provided in section 4 of **Application Document 5.1.7 Appendix F Targeted consultation**.
- 9.2.7 A full list of the bodies consulted under Section 42(1)(a), as identified through Schedule 1 of the Applications: Prescribed Forms and Procedure (APFP) Regulations can be found in section 1 of **Application Document 5.1.6 Appendix E Statutory consultation**. However, a number of additional consultees were also identified, see Table 9.1.

Table 9.1 Additional Section 42(1)(a) prescribed consultees

| Consultee name                                  | Reason                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Leiston-cum-Sizewell Town Council               | The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2024 ('the 2024 Regulations') came into force on 30 April 2024. These regulations made several amendments to The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the 2009 Regulations'), under which the Section 42(1)(a) prescribed bodies were previously identified. |
| Aldringham-cum-Thorpe Parish Council            |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Theberton Parish Council                        |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Farnham with Stratford St Andrew Parish Council |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Snape Parish Council                            |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Tunstal Parish Council                          |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Iken Parish Council                             |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Sudbourne Parish Council                        |                                                                                                                                                                                                                                                                                                                                                                                                          |
| Orford and Gedgrave Parish Council              | One of the changes made was to introduce new wording to guide developers in defining a                                                                                                                                                                                                                                                                                                                   |

| Consultee name                                       | Reason                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Butley, Capel St Andrew and Wantisden Parish Council | ‘relevant’ body. The 2024 Regulations stipulate that a ‘relevant’ body now includes bodies which have ‘responsibility for an area which neighbours that location [where the proposals may or will be sited]’. As such, National Grid has added a number of neighbouring bodies to its list of Section 42(1)(a) prescribed bodies. Some of these bodies were previously consulted as non-prescribed consultees. |
| Chillsford Parish Council                            |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Middleton Cum Fordley Parish Council                 |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Rendham Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Sweffling Parish Council                             |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Great Glemham Parish Council                         |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Little Glenham Parish Council                        |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Yoxford Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Sibton Parish Council                                |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Campsea Ashe Parish Council                          |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Dunwich Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Blaxhall Parish Council                              |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Monkton Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Acol Parish Council                                  |                                                                                                                                                                                                                                                                                                                                                                                                                |
| St Nicholas at Wade with Sarre Parish Council        |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Birchington Parish Council                           |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Manston Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Broadstairs Town Council                             |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Margate Charter of Trustees                          |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Ramsgate Town Council                                |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Westgate on Sea Town Council                         |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Sandwich Town Council                                |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Stourmouth Parish Council                            |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Preston Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Chislet Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Woodnesborough Parish Council                        |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Wingham Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Sholden Parish Council                               |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Deal Town Council                                    |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Eastry Parish Council                                |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Northbourne Parish Council                           |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Staple Parish Council                                |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Hoath Parish Council                                 |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Essex Highways                                       |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Essex County Fire and Rescue Service                 |                                                                                                                                                                                                                                                                                                                                                                                                                |
| Essex Police, Fire and Crime Commissioner            |                                                                                                                                                                                                                                                                                                                                                                                                                |

| Consultee name                            | Reason |
|-------------------------------------------|--------|
| Kent and Medway Fire and Rescue Authority |        |
| Cambridgeshire Highways                   |        |
| Cambridgeshire Police and Crime           |        |
| Cambridgeshire Fire and Rescue            |        |

## Identification of Parish Councils

- 9.2.8 A list of the parish councils consulted for the targeted consultation in accordance with Schedule 1 to the APFP Regulations, which lists ‘the relevant parish council’ consultation can be found in section 1 of **Application Document 5.1.6 Appendix E Statutory Consultation**. However, a number of additional consultees were also identified, see Table 9.1 in this report.

## Section 42(1)(b): Identification of Local Authorities

- 9.2.9 Letters were sent to Section 42(1)(b) bodies on 05 July 2024 containing a copy of the Proposed Project Community Newsletter (section 2 of **Application Document 5.1.7 Appendix F Targeted Consultation**) and a copy of the Section 48 notice (section 3 of **Application Document 5.1.7 Appendix F Targeted Consultation**). Email notifications were sent on 08 July 2024 and also contained the Community Newsletter and Section 48 notice in compliance with Regulation 13 of the Infrastructure EIA Regulations 2017. The letter is provided in section 4 of **Application Document 5.1.7 Appendix F Targeted Consultation**.

## Section 42(1)(d) Parties

- 9.2.10 In advance of the Targeted consultation, National Grid carried out diligent inquiries on the additional land required. The diligent inquiries identified persons who were not previously consulted under Section 42(1)(d) during the Statutory consultation carried out between 24 October 2023 and 18 December 2023. These persons are listed in section 1 of **Application Document 5.1.7 Appendix F Targeted Consultation**. Diligent inquiries also identified persons with interests in the additional land required who had previously been consulted under Section 42(1)(d) during the Statutory consultation carried out between 24 October 2023 and 18 December 2023. These persons are listed in section 1 of **Application Document 5.1.7 Appendix F Targeted Consultation**.
- 9.2.11 Consultation letters were issued on 05 July 2024. A copy of the letter is provided in section 4 of **Application Document 5.1.7 Appendix F Targeted Consultation**. A copy of the formal newspaper notice of the application in accordance with Section 48 of the Planning Act and Regulation 4 of the APFP Regulations was issued in the following week. A further letter offering face-to-face meetings was issued by Dalcour Maclaren on the 08 July 2024.

## Notification to the Planning Inspectorate

- 9.2.12 On 05 July 2024, National Grid notified the Planning Inspectorate of the upcoming targeted consultation by email. On 08 July 2024, National Grid notified the Planning

Inspectorate of the upcoming Targeted consultation by post. Both notifications were enclosed with the following information which can be found in the sections noted of **Application Document 5.1.7 Appendix F Targeted Consultation**:

- Section 46 letter (Section 5);
- community newsletter (Section 2);
- project update document (Section 6);
- additional preliminary environmental information (Section 7);
- additional preliminary information executive summary (Section 8);
- environmental constraint plans (Section 9);
- general arrangement plans (Section 10);
- changes to order limits plans (Section 11);
- further design drawings (Section 12);
- Section 48 notice (Section 3); and
- Section 47 notice (Section 13). 2024 targeted

## Section 47 Consultees

- 9.2.13 Section 47 of the Planning Act 2008 sets out an applicant's duty to consult the local community about a proposed application. This was done in line with the SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**), which was published on 18 October 2023. The SoCC allowed for future targeted consultations to be held in accordance with the principles and methods set out in Section 4.3 of the SoCC.

## Engaging Seldom Heard Groups

- 9.2.14 Seldom heard groups are defined as being inaccessible to most traditional and conventional methods of consultation for any reason. These reasons could include young people, people with a physical disability, people with learning difficulties and people whose first language is not English. These people are less likely to participate in or respond to traditional consultation techniques in comparison to other consultees. This was done in line with the SoCC, (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) which was published on 18 October 2023. The SoCC allowed for future targeted consultations to be held in accordance with the principles and methods set out in the SoCC.

## Advertising and Publicity

- 9.2.15 Table 9.2 summarises the range of methods used to advertise the Targeted consultation and the section 47 consultation to the public.

Table 9.2 Additional Section 42(1)(a) prescribed consultees

| Publication                                                                          | Date                       | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Newsletter                                                                           |                            | A newsletter was posted to all residential and business addresses within the PCZ (see section 2 of <b>Application Document 5.1.7 Appendix F Targeted Consultation</b> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Newspaper notices (published in accordance with Section 47 of the Planning Act 2008) | 01.07.2024 and 04.07.2024– | <p>National Grid placed the Section 47 notice in the local press to publicise the Targeted consultation:</p> <ul style="list-style-type: none"> <li>• East Anglian Daily Times</li> <li>• Kentish Gazette (section 16 of <b>Application Document 5.1.7 Appendix F Targeted Consultation</b>)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Newspaper notices (published in accordance with Section 48 of the Planning Act 2008) | 04.07.2024 – 11.07.2024    | <p>National Grid placed the Section 48 notice in the local press to publicise the Targeted consultation:</p> <ul style="list-style-type: none"> <li>• East Anglian Daily Times</li> <li>• Kentish Gazette</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Social media                                                                         |                            | <p>National Grid publicised details of the Targeted consultation, including reminders when and where events were taking place via National Grid’s Facebook account and Instagram account. Copies of the Facebook and Instagram posts are enclosed in section 14 of <b>Application Document 5.1.7 Appendix F Targeted Consultation</b>.</p> <p>A summary of the Facebook and Instagram posts were as follows:</p> <ul style="list-style-type: none"> <li>• Post 1-4: The posts announced the latest consultation and signposted users to the consultation website to explore materials and to sign up to a webinar. Two versions were circulated, one for Suffolk and one for Kent.</li> <li>• Post 5 &amp; 6: The posts announced the latest consultation and signposted users to the consultation website to explore materials. Two versions were circulated, one for Suffolk and one for Kent.</li> <li>• Posts 7 &amp; 8: Two carousels were created, one for Suffolk and one for Kent. The carousels highlighted the key changes in</li> </ul> |

| Publication  | Date | Details                                                                                                                                                                                              |
|--------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |      | each region and signposted users to the consultation website to explore materials.                                                                                                                   |
| Site notices |      | Site notices were placed in 21 locations in Suffolk and 13 locations in Kent. A copy of the notice is provided in section 15 of <b>Application Document 5.1.7 Appendix F Targeted Consultation</b> . |

## Responses to Section 47 Targeted Consultation

- 9.2.16 Following the Targeted consultation deadline, National Grid recorded and considered all relevant responses in finalising the DCO application.
- 9.2.17 Section 9.5 summarises details of the relevant responses received from Section 47 consultees during the Targeted consultation period. As respondents online did not identify if they were responding to Section 47 consultation or Section 48 publicity, Section 9.5 discusses the relevant responses from non-Section 42 consultees which includes both Section 47 and Section 48 respondents.
- 9.2.18 Furthermore, a summary of the responses received, together with details of how National Grid has considered those responses in finalising its DCO application in accordance with its duty under Section 49 of the Planning Act 2008, is provided in section 18 of **Application Document 5.1.7 Appendix F Targeted Consultation**.

## Section 48 Publicity

- 9.2.19 This section provides an overview of how National Grid publicised the targeted consultation pursuant to Section 48 of the Planning Act 2008 and complied with Regulation 13 of the Infrastructure EIA Regulations 2017.
- 9.2.20 As required by Section 48 of the Planning Act 2008 and Regulation 4 of the APFP Regulations, a notice publicising the proposed application for development consent for the Proposed Project was published on 08 July 2024 in the London Gazette, once in a national newspaper (The Guardian), once in Lloyd's List Daily Briefing, once in a fishing trade journal (Fishing News) and for two successive weeks in a local newspaper (East Anglian Times, Kentish Gazette). Copies of the notices, as published, are enclosed in section 16 of **Application Document 5.1.7 Appendix F Targeted Consultation**.
- 9.2.21 Table 9.3 sets out details of the publications and date for the Section 48 notice.

Table 9.3 Additional Section 42(1)(a) prescribed consultees

| Publication title | Dates of first notice | Date of second notice | Deadline provided | Copy reference |
|-------------------|-----------------------|-----------------------|-------------------|----------------|
| Fishing News      | 04.07.2024            | N/A                   | 11.08.2024        |                |

| Publication title        | Dates of first notice                 | Date of second notice | Deadline provided | Copy reference                                                                       |
|--------------------------|---------------------------------------|-----------------------|-------------------|--------------------------------------------------------------------------------------|
| Kentish Gazette          | 27.06.2024 <sup>7</sup><br>04.07.2024 | 11.07.2024            | 11.08.2024        | See section 16 of <b>Application Document 5.1.7 Appendix F Targeted Consultation</b> |
| East Anglian Daily Times | 04.07.2024                            | 08.07.2024            | 11.08.2024        |                                                                                      |
| London Gazette           | 08.07.2024                            | N/A                   | 11.08.2024        |                                                                                      |
| Guardian                 | 08.07.2024                            | N/A                   | 11.08.2024        |                                                                                      |
| Lloyd's List             | 03.07.2024                            | N/A                   | 11.08.2024        |                                                                                      |

9.2.22 The Section 48 notice was also provided on the Proposed Project webpage and at five deposit point locations in Suffolk and seven locations in Kent.

9.2.23 A copy of the Section 48 notice is included in section 3 of **Application Document 5.1.7 Appendix F Targeted Consultation**.

## Compliance with Infrastructure Planning (EIA) Regulations 2017

9.2.24 Targeted consultation met the requirements of the EIA Regulations in respect of the provision of Preliminary Environmental Information. Additional Preliminary Environmental Information was consulted on, which set out the potential for any additional likely significant environmental effects associated with the changes, against those presented in the Preliminary Environmental Report at Statutory consultation.

## 9.3 How National Grid Carried out the 2024 Targeted Consultation

9.3.1 The Targeted consultation was carried out in accordance with the principles and methods set out in the SoCC, (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) which was prepared for the previous Statutory consultation held between 24 October 2023 and 18 December 2023. The SoCC allowed for future targeted consultations to be held in accordance with the principles and methods set out in the SoCC.

9.3.2 National Grid's consultation activities comprised of:

- updating the proposed project website;
- emailing interested parties who registered for Proposed Project updates;
- providing consultation materials;

<sup>7</sup> A Section 48 notice was published on 27.06.2024 but the wording was altered after the print deadline. Therefore, the notice was re-published on 04.07.2024.



- providing landowners notice and cover letter;
- six-page newsletter circulated within 3 km of the revised Order Limits;
- media and social media publications;
- consultation materials provided at deposit locations;
- webinars; and
- stakeholder briefings.

## Proposed Project Dedicated Website, Email and Information Line

- 9.3.3 The Proposed Project website was updated and contained all the Targeted consultation documents.
- 9.3.4 Targeted consultation feedback could be provided through the Proposed Project dedicated email address [contact@sealink.nationalgrid.com](mailto:contact@sealink.nationalgrid.com), by calling 0808 134 9569 or by writing to Freepost SEA LINK.

## Consultation Documents

- 9.3.5 To support the delivery of the Targeted consultation, National Grid produced a variety of consultation documents to explain the changes to the Proposed Project that were being consulted on, and to publicise the consultation, the methods via which people could respond and the date by which responses needed to be provided. National Grid ensured information was available by:
- uploading all consultation documents to the Proposed Project website;
  - depositing key consultation documents at easily accessible public information points;
  - organising webinars to give local people an opportunity to learn about the proposed changes to the Proposed Project and give them the opportunity to ask questions; and
  - making documents available in paper copy on request.
- 9.3.6 The consultation documents that were available to be viewed either on the Proposed Project website or at information points are as follows:
- project update document;
  - community newsletter;
  - additional preliminary environmental information;
  - environmental constraints plans;
  - general arrangement plans;
  - change to order limits plans; and
  - further design drawings.

## Media and Social Media

- 9.3.7 A social media campaign promoting the Targeted consultation launched on 08 July 2024 and ran to 29 July 2024. It included eight adverts in total, four of which were

targeted to the Suffolk area and the other remaining four covered Kent. Each advert was displayed on both Instagram and Facebook, totalling sixteen posts.

- 9.3.8 A press release was placed on the Proposed Project website at the start of consultation to promote the launch to the wider public.

## Deposit Locations

- 9.3.9 Paper copies of the consultation documents were made available at the deposit points in Table 9.4. Information on how to access a digital copy of the full Preliminary Environmental Information Report was also provided. The deposit point locations were selected following a review of the success of the deposit points utilised at the Statutory consultation. The documents made available were as follows:

- project update document;
- community newsletter;
- general arrangement plan;
- environmental constraints plan;
- changes to order limits plan;
- statement of community consultation;
- poster;
- further design drawings;
- Section 47 notice; and
- Section 48 notice.

Table 9.4 Deposit locations for Targeted consultation

| Location             | Address                                         |
|----------------------|-------------------------------------------------|
| Saxmundham Library   | Block B, Street Farm Road, Saxmundham, IP17 1AL |
| Leiston Library      | Main Street, Leiston, IP16 4ER                  |
| Aldeburgh Library    | Victoria Road, Aldeburgh, IP15 5EG              |
| Snape Village Hall   | 5 Garrett Close, Snape, Saxmundham, IP17 1RN    |
| Friston Village Hall | Church Road, Friston, Saxmundham, IP17 1PU      |
| Ash Library          | 11 Queen's Road, Ash, Canterbury, CT3 2BG       |
| Minster Library      | 4a Monkton Road, Minster, Ramsgate, CT12 4EA    |
| Sandwich Library     | 13 Market Street, Sandwich, CT13 9DA            |

| Location                | Address                                                 |
|-------------------------|---------------------------------------------------------|
| Ramsgate Library        | Guildford Lawn, Ramsgate, CT11 9AY                      |
| Newington Library       | Royal Harbour Academy, Stirling Way, Ramsgate, CT12 6FA |
| Thanet District Council | Cecil Street, Margate, CT9 1AY                          |
| Margate Library         | Cecil Street, Margate, CT9 1RE                          |

## Webinars

- 9.3.10 Online webinars were held on the dates and times identified in Table 9.5, which also provides attendance statistics. A total of four webinars were held during the Targeted consultation period. Each webinar included a 'question and answer' session enabling members of the public to submit questions to the team for a response.
- 9.3.11 A pre-recorded webinar was shared on the Proposed Project website at the start of the Targeted consultation period, providing an overview of the onshore proposals in Suffolk and Kent, together with the marine proposals.
- 9.3.12 While it was not possible to submit a relevant response to the Targeted consultation during the webinars, they provided an option for consultees to ask for information about the Proposed Project, the Targeted consultation or the Targeted consultation materials.

Table 9.5 Webinars Held During the Targeted Consultation

| Date         | Time             | Webinar description                                        | Number of attendees |
|--------------|------------------|------------------------------------------------------------|---------------------|
| 08 July 2024 | Pre-recorded     | Onshore proposals in Suffolk and Kent and marine proposals | N/A                 |
| 15 July 2024 | 6.30pm to 7.45pm | Onshore proposals in Suffolk and marine proposals          | 35                  |
| 16 July 2024 | 6.30pm to 7.45pm | Onshore proposals in Kent and marine proposals             | 40                  |
| 17 July 2024 | 6.30pm to 7.45pm | Onshore proposals in Suffolk and marine proposals          | 18                  |
| 22 July 2024 | 6.30pm to 7.45pm | Onshore proposals in Kent and marine proposals             | 28                  |

## Stakeholder Briefings

- 9.3.13 National Grid held stakeholder briefing sessions between 09 July 2024 and 31 July 2024. The briefings were conducted using video conferencing. National Grid presented

information on the changes to the Proposed Project since Statutory consultation and provided details of the Targeted consultation, including how stakeholders could engage with the process. The presentation was followed by an open discussion where attendees could ask questions and discuss issues of concern. Briefing sessions were held with the stakeholders presented in Table 9.6.

**Table 9.6 Stakeholder briefing sessions**

| <b>Stakeholder briefing session</b>                                                                           | <b>Date</b>  |
|---------------------------------------------------------------------------------------------------------------|--------------|
| East Suffolk District Council members                                                                         | 09 July 2024 |
| Suffolk County Council members                                                                                | 15 July 2024 |
| Minster Parish Council and Ramsgate Town Councils                                                             | 17 July 2024 |
| Saxmundham Town Council                                                                                       | 17 July 2024 |
| Friston, Aldringham Cum-Thorpe Parish Council, Benhall and Sternfield Parish Council and Snape Parish Council | 22 July 2024 |
| Deal Town Council, Sandwich Town Council, Ramsgate Town Council and Cliffsend Parish Council                  | 23 July 2024 |
| Thanet District Council members                                                                               | 23 July 2024 |
| Kent County Council members                                                                                   | 24 July 2024 |
| Aldeburgh Town Council, Sweffling Parish Council and Yoxford Parish Council                                   | 24 July 2024 |
| Yoxford Parish Council, Theberton and Eastbridge Parish Council                                               | 25 July 2024 |
| Kelsale-cum-Carlton Parish Council                                                                            | 31 July 2024 |

## 9.4 Analysis of Responses Received

### Number and Format of Responses

- 9.4.1 A total of 718 relevant responses were submitted to National Grid in response to the Targeted consultation held between 08 July 2024 and 11 August 2024. That number includes responses received after the deadline, which were accepted by National Grid on a discretionary basis.
- 9.4.2 Consultees who participated in the Q&A at the end of the online webinars were informed that they should submit their relevant response to the Targeted consultation, if they wished to do so, via the feedback mechanism set out in the publicity materials and consultation documents for them to be considered a relevant response and taken into account accordingly.
- 9.4.3 As such, any verbal comments or feedback provided via telephone, via a virtual meeting or via other channels such as social media, were not considered as a relevant response and have therefore not been taken into account in the analysis. If comments on the Project were provided by email and it was not clear if the comments were intended to be a formal submission of feedback, National Grid sought to contact that person and seek clarity. National Grid took a precautionary approach in which such comments were treated as formal feedback if confirmation was not forthcoming.
- 9.4.4 Furthermore, in some instances agents acting on behalf of landowners submitted minutes of meetings held as feedback. These were accepted and the feedback included in the analysis of responses. The landowners were also invited to submit their responses via the Proposed Project email.
- 9.4.5 Responses were therefore received through the submission of emails or letters.
- 9.4.6 Table 9.7 provides a breakdown of the number of responses per consultee category. As respondents online did not identify if they were responding to Section 47 consultation or Section 48 publicity, this chapter discusses the relevant responses from non-Section 42 consultees as both Section 47 and Section 48 respondents.

Table 9.7 Number of responses per consultee category

| Consultee category                                                      | Number of responses |
|-------------------------------------------------------------------------|---------------------|
| Section 42(1)(a) statutory consultees (including statutory undertakers) | 34                  |
| Section 42(1)(b) relevant local authorities                             | 25                  |
| Section 42(1)(d) people with an interest in the land                    | 15                  |
| Section 47 and Section 48 consultees                                    | 644                 |

## Consultation Analysis Method

- 9.4.7 For all feedback received a coding tree was developed to categorise the feedback into themes. The codes used were based on the scope of the Proposed Project and the topics considered in the Preliminary Environmental Information Report. The number of codes totalled 56 and, for ease of reference, these topics are grouped under the headings of Terrestrial, Marine, Project-Wide and Additional in Table 8.2 in Chapter 8.
- 9.4.8 In the Newsletter that was issued for Targeted consultation, National Grid stated that there was no need to resubmit comments given at a previous stage of consultation and asked that, when sharing comments it would be helpful if respondents could include the part of the Proposed Project they relate to, e.g. permanent infrastructure; construction and maintenance work; mitigation, enhancements and approach to biodiversity net gain; strategy for coordination; and anything else.
- 9.4.9 A consultation response could be allocated up to three codes to highlight the different themes or elements of the Proposed Project covered. To assist the Proposed Project team in identifying which scheme was being commented on, the feedback was also categorised into either Suffolk, Kent or General. The sentiment of the comment was then added (either positive, negative or neutral) and whether the comment could be considered a suggestion.
- 9.4.10 All feedback, regardless of origin, was reviewed and assigned a code or codes. Following the coding exercise, all coding was reviewed to ensure that codes had been applied in a consistent manner.

## 9.5 Section 42 Consultation Feedback

- 9.5.1 The responses to Targeted consultation were received predominantly from Section 42(1)(a) parties. Table 9.8 provides a list of the codes that were applied to the relevant responses in respect of Section 42(1)(a), Section 42(1)(b) and Section 42(1)(d) parties. The codes that occurred the most were: design; construction - general; onshore mitigation; coordination with other projects; cultural heritage; and traffic and transport. As noted above, Section 42(1)(d) parties were noted if they identified themselves as such in their response.
- 9.5.2 National Grid has reviewed each of the Section 42 relevant responses and coded them in accordance with the above methodology. Table 9.8 sets out the topics that were raised in feedback from the Section 42 parties. The most common topics for comment related to:
- coordination with other projects;
  - traffic and transport;
  - onshore mitigation;
  - terrestrial ecology;
  - construction; and
  - needs case.
- 9.5.3 All the responses received from Section 42 consultees during Targeted consultation (set out verbatim), together with details of how National Grid's regard had and how it has considered those responses in finalising its application for development consent in accordance with its duty under Section 49 of the Planning Act 2008, is provided in

section 17 of **Application Document 5.1.7 Appendix F Targeted Consultation**. A summary of the feedback received is in provided in Table 9.10 towards the end of this Chapter. The August 2024 guidance states that it may be appropriate for the applicant to group responses under headline issues, therefore, the feedback in this table is grouped into themes and it is indicated whether a s42(1) respondent provided feedback on a particular theme.

Table 9.8 Section 42 respondents, Targeted consultation

| Name of s42 respondent                               | Codes applied to consultation response                                                                                                                                                                                                                     |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section 42(1)(a)</b>                              |                                                                                                                                                                                                                                                            |
| Aldeburgh Town Council                               | Needs case, inter-project cumulative effects; alternative solutions; coordination with other projects; socio-economics, recreation and tourism; traffic and transport; geology and hydrogeology; landfall location; intra-project cumulative effects       |
| Anglian Water                                        | Landfall location; onshore route location; onshore mitigation; DCO process; consultation                                                                                                                                                                   |
| Babergh and Mid Suffolk District Councils            | Consultation (no new comments)                                                                                                                                                                                                                             |
| Dover District Council                               | Needs case; legislation and policy; onshore mitigation; design; converter station location; landscape and visual; construction – general; walking, cycling and horse-riders; terrestrial ecology; ornithology; cultural heritage; geology and hydrogeology |
| Eastern Inshore Fisheries and Conservation Authority | Commercial fisheries, offshore mitigation, offshore route location, benthic ecology; ornithology; marine mammals; habitat regulations screening                                                                                                            |
| East Suffolk Water Management Board                  | Water environment; construction – general; converter station location; onshore mitigation; terrestrial ecology; ornithology                                                                                                                                |
| East Sussex County Council                           | Consultation; walking, cycling and horse-riders; construction – general; traffic and transport; landscape and visual; onshore mitigation; legislation and policy                                                                                           |
| Essex County Council                                 | Construction – general; socio-economics, recreation and tourism; traffic and transport; inter-project cumulative effects; coordination with other projects                                                                                                 |
| Forestry Commission                                  | Landscape and visual; legislation and policy                                                                                                                                                                                                               |
| GTC Pipelines Ltd                                    | Design                                                                                                                                                                                                                                                     |
| Harwich Haven Harbour Authority                      | Legislation and policy; consultation; coordination with other projects; shipping and navigation; DCO process; design; offshore route location;                                                                                                             |



| Name of s42 respondent              | Codes applied to consultation response                                                                                                                                                                                                                                                                                                        |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Kent County Council                 | Water environment; climate change; traffic and transport; construction – general; walking, cycling and horse-riders; design; intra-project cumulative effects; onshore mitigation; landfall location; cultural heritage; onshore route location; converter station location; construction – compound areas; terrestrial ecology; consultation |
| Kent Fire and Rescue Service        | Design; consultation; traffic and transport; legislation and policy; safety; onshore mitigation                                                                                                                                                                                                                                               |
| Leiston-cum-Sizewell Town Council   | Needs case; onshore mitigation; coordination with other projects; alternative solutions;                                                                                                                                                                                                                                                      |
| Monkton Parish Council              | Needs case; terrestrial ecology; agriculture and soils                                                                                                                                                                                                                                                                                        |
| National Highways                   | Traffic and transport; legislation and policy                                                                                                                                                                                                                                                                                                 |
| Natural England                     | Terrestrial ecology; legislation and policy                                                                                                                                                                                                                                                                                                   |
| Port of London                      | Shipping and navigation; design; habitat regulations screening                                                                                                                                                                                                                                                                                |
| Suffolk & Essex Coast & Heaths AONB | Consultation; intra-project cumulative effects; coordination with other projects; legislation and policy; onshore mitigation; design; onshore route location; construction – compound areas; inter-project cumulative effects; construction – general; landfall location; terrestrial ecology; landscape and visual                           |
| Suffolk Constabulary                | DCO process; onshore mitigation; consultation; design; construction – general; timescales/programme; traffic and transport; safety; intra-project cumulative effects                                                                                                                                                                          |
| Surrey County Council               | Consultation (no comments)                                                                                                                                                                                                                                                                                                                    |
| Thurrock Council                    | Consultation (no comments)                                                                                                                                                                                                                                                                                                                    |

## 9.6 Section 47 Consultation and Section 48 Publicity Feedback

- 9.6.1 Out of the 718 responses received during the Targeted consultation, 644 were received from Section 47 and Section 48 respondents.
- 9.6.2 A significant amount of the feedback received during Targeted consultation was not directly related to the scheme changes consulted on, i.e. much of the feedback was the same as that received during Statutory consultation. Chapter 8 and section 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** provide the relevant responses received at Statutory consultation together with National Grid's regard had. The key common issues between Statutory consultation and Targeted consultation are provided in Table 9.9, together with the location within Appendix E of where the regard had can be found. If anything different was raised on the same topic, or if something had changes between Statutory consultation and Targeted consultation,

this is addressed in Section 18 of **Application Document 5.1.7 Appendix F Targeted Consultation** and is summarised in Table 9.10.

Table 9.9 Key themes of feedback common to both Statutory and Targeted consultation

| Theme                    | Summary of feedback                                                                                                                                                                                                                                                                      | Location of regard had in Application Document 5.1.6 Appendix E Statutory Consultation |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| Landscape and visual     | <ul style="list-style-type: none"> <li>• Development in an Area of Outstanding Beauty.</li> <li>• Visual impact on historic landscape, heritage coast and sites of cultural significance.</li> <li>• Light pollution.</li> </ul>                                                         | Section 25, Table 1.1                                                                  |
| Terrestrial ecology      | <ul style="list-style-type: none"> <li>• Construction in designated sites.</li> <li>• Impact on wildlife in Minster Marshes and Pegwell Bay.</li> <li>• Lack of sufficient ecological surveys.</li> <li>• Biodiversity and climate change crisis.</li> </ul>                             | Section 25, Table 1.2                                                                  |
| Water environment        | <ul style="list-style-type: none"> <li>• Construction in a flood plain increasing the risk of flooding in other areas.</li> <li>• Runoff from hardstanding causing pollution in local water bodies.</li> <li>• Impact on the expansion of Weatherlees sewage treatment plant.</li> </ul> | Section 25, Table 1.4                                                                  |
| Geology and hydrogeology | <ul style="list-style-type: none"> <li>• Unsuitability of the proposed landfall location in Suffolk due to the fragile geology.</li> <li>• Impact on the Coralline Crag.</li> <li>• Concerns over the impact on erosion.</li> </ul>                                                      | Section 25, Table 1.5                                                                  |
| Agriculture and soils    | <ul style="list-style-type: none"> <li>• Loss of agricultural land.</li> <li>• Damage to soils during installation of the cables.</li> </ul>                                                                                                                                             | Section 25, Table 1.6                                                                  |
| Traffic and transport    | <ul style="list-style-type: none"> <li>• Increased traffic on local road network.</li> <li>• Proposed access to converter station off the B1121.</li> <li>• Delays to emergency services.</li> </ul>                                                                                     | Section 25, Table 1.7                                                                  |

| Theme                                  | Summary of feedback                                                                                                                                                                                                                                                                                                               | Location of regard had in Application Document 5.1.6 Appendix E Statutory Consultation |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
|                                        | <ul style="list-style-type: none"> <li>• Pedestrian and cyclist safety during construction.</li> </ul>                                                                                                                                                                                                                            |                                                                                        |
| Noise                                  | <ul style="list-style-type: none"> <li>• Noise pollution during operation.</li> </ul>                                                                                                                                                                                                                                             | Section 25, Table 1.9                                                                  |
| Socio-economic, recreation and tourism | <ul style="list-style-type: none"> <li>• Impact on tourist industry.</li> <li>• Impact on property values.</li> <li>• Compensation.</li> </ul>                                                                                                                                                                                    | Section 25, Table 1.10                                                                 |
| Health and wellbeing                   | <ul style="list-style-type: none"> <li>• Ruination of areas used by the general public to improve their mental health such as nature reserves.</li> <li>• Impact on mental health during construction.</li> <li>• Impact on mental health from responding to multiple consultation exercises for projects in the area.</li> </ul> | Section 25, Table 1.11                                                                 |
| Inter-project cumulative effects       | <ul style="list-style-type: none"> <li>• The cumulative impact of many projects in both Suffolk and Kent.</li> </ul>                                                                                                                                                                                                              | Section 25, Table 1.12                                                                 |
| Marine mammals                         | <ul style="list-style-type: none"> <li>• Impact on seals in Pegwell Bay.</li> </ul>                                                                                                                                                                                                                                               | Section 25, Table 1.16                                                                 |
| Ornithology                            | <ul style="list-style-type: none"> <li>• Impact of overhead lines on birds.</li> <li>• Impact on migratory birds in Pegwell Bay (East Atlantic Flyway).</li> </ul>                                                                                                                                                                | Section 25, Table 1.17                                                                 |
| Marine conservation zone assessment    | <ul style="list-style-type: none"> <li>• Impacts on Margate and Long Sands Special Area of Conservation and Goodwin Sands Marine Conservation Zone.</li> </ul>                                                                                                                                                                    | Section 25, Table 1.24                                                                 |
| Alternative solutions                  | <ul style="list-style-type: none"> <li>• All development should be on brownfield sites or offshore.</li> </ul>                                                                                                                                                                                                                    | Section 25, Table 1.15                                                                 |
| Design                                 | <ul style="list-style-type: none"> <li>• Use of open cut versus trenchless solutions for installation of the cables.</li> </ul>                                                                                                                                                                                                   | Section 25, Table 1.26                                                                 |
| Needs case                             | <ul style="list-style-type: none"> <li>• No need for the Proposed Project in Suffolk or Kent.</li> </ul>                                                                                                                                                                                                                          | Section 25, Table 1.27                                                                 |
| Coordination with other projects       | <ul style="list-style-type: none"> <li>• Norwich to Tilbury.</li> </ul>                                                                                                                                                                                                                                                           | Section 25, Table 1.28                                                                 |

| Theme                             | Summary of feedback                                                                                                                                                                                                                                                                 | Location of regard had in Application Document 5.1.6 Appendix E Statutory Consultation |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
|                                   | <ul style="list-style-type: none"> <li>Lack of coordination regarding consultation exercises.</li> </ul>                                                                                                                                                                            |                                                                                        |
| Safety                            | <ul style="list-style-type: none"> <li>Risk of fire during operation.</li> <li>Vulnerability of infrastructure to hostile attack.</li> </ul>                                                                                                                                        | Section 25, Table 1.29                                                                 |
| Mitigation                        | <ul style="list-style-type: none"> <li>Claims that no matter what mitigation is proposed, the impacts can never be mitigated for.</li> </ul>                                                                                                                                        | Section 25, Table 1.34                                                                 |
| Consultation                      | <ul style="list-style-type: none"> <li>Concerns that the feedback has not been adequately addressed and the community has not been listened to.</li> <li>Concerns over the ability of the local community to adequately respond to consultations from multiple projects.</li> </ul> | Section 25, Table 1.35                                                                 |
| Walking, cycling and horse-riders | <ul style="list-style-type: none"> <li>Impact on public rights of way.</li> </ul>                                                                                                                                                                                                   | Section 25, Table 1.36                                                                 |
| Project finance/cost of scheme    | <ul style="list-style-type: none"> <li>Concerns that decisions are based on the cheapest cost, rather than minimising the cost to wildlife and the environment.</li> </ul>                                                                                                          | Section 25, Table 1.40                                                                 |

- 9.6.3 The August 2024 guidance states that it may be appropriate for the applicant to group responses under headline issues.
- 9.6.4 Therefore, a themed summary of the responses received from Section 47 and 48 consultees during Targeted consultation, together with details of how National Grid has considered those responses in finalising its application for development consent in accordance with its duty under Section 49 of the Planning Act 2008, is provided in section 18 of **Application Document 5.1.7 Appendix F Targeted Consultation**.
- 9.6.5 A summary of the relevant responses received during Targeted consultation from emails and letters that are specific to the Proposed Project changes is provided in the following sections, together with a summary of National Grid's regard had.

## Suffolk – Permanent Infrastructure

### Selection of western access route at the Saxmundham Converter Station site (modified)

- 9.6.6 Much of the feedback received regarding the selection of the western access route concerned the fact that there is no satisfactory access road to the converter station because the site selection is flawed. Many respondents commented that it is not possible to access a major construction hub at Wood Farm without safety,

environmental and economic concerns. Some felt that the converter stations should be located on coastal brownfield sites.

- 9.6.7 Some respondents raised concerns regarding safety at the junction known as Bigsby's Corner on the B1121. The fact that the B1121 passes through the village of Benhall Green where pedestrians, cyclists and horse riders are present, and that this road is narrow and already heavily trafficked was mentioned by some. Concerns were raised over additional traffic passing through Benhall which could have noise and air quality impacts.
- 9.6.8 Furthermore, concerns were raised over the impact of the western access route on the heritage views to Hurts Hall and St John's church, and the loss of mature trees, in particular oak trees and a specimen horse chestnut tree.

## Summary of regard

- 9.6.9 Selecting the western construction and maintenance access route means that National Grid has removed the alternative northern (option 2) and southern (option 1) access routes from its plans. The southern access route, following further review, is not suitable for the construction traffic required. The northern access route, which is approximately double the length of the western alternative, would have required bridge crossings of the River Fromus and one or both of the railway lines. There are engineering challenges associated with the construction of these bridges, including the likelihood of significant works being required to either the B1121 or the River Fromus itself. Construction work would have also been required in the immediate vicinity of residential properties at Oak Close and along neighbouring streets in Saxmundham. These factors increase the risk of delay and could result in a longer construction period, hence the decision to remove the northern access route from the proposals.
- 9.6.10 Selecting the western access route will involve the construction of a bridge over the River Fromus ('the Fromus Crossing'). During Targeted consultation, there were two key design aspects that National Grid were considering based on feedback received from the Environment Agency and the S47 and S48 respondents.
- 9.6.11 The Environment Agency has requested a bridge height of 6 m due to concerns regarding compliance with the Water Framework Directive. However, National Grid's preference is for a 4 m high bridge and so two bridge height options (4 m and 6 m) have been taken forward to the DCO submission whilst discussions with the Environment Agency in relation to the appropriate size of the bridge continue.
- 9.6.12 The s47 and s48 respondents raised concerns regarding the impact of the Fromus Crossing on mature trees, citing oak trees and a specimen horse chestnut tree. National Grid reviewed the design of the Crossing by undertaking a technical assessment, and the location of the Crossing has been moved to lessen the impact to trees and other receptors.
- 9.6.13 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** assesses the potential impact of construction traffic on the local community. It includes a review of the collision record (based on full collision data obtained from Suffolk County Council) and an assessment of road safety for the study area, which includes the A12/ B1121 junction. This 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 road safety of this junction, with the mitigation identified within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk** and secured through Requirement 6 of Schedule 3 of **Application**

**Document 3.1 draft Development Consent Order.** Further consultation was held with Suffolk County Council as the ES was prepared.

- 9.6.14 The reasoning behind the selection of the location and the alternatives considered is set out in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered.**
- 9.6.15 The special nature of the landscape is acknowledged by National Grid. The effects arising from the Proposed Project on landscape and visual aspects have been assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** This Chapter includes proposed mitigation measures that have been embedded in the design to minimise the effects.
- 9.6.16 A full assessment of the potential for impacts on the setting of heritage assets, including the Church of St John the Baptist), the Grade II listed Hurts Hall, and the associated non-designated parkland is included in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.** This assessment is supported by visualisations/photomontages prepared in consultation with heritage stakeholders including East Suffolk Council. The proposed Saxmundham Converter Station is likely to be perceptible in views from within the gardens of Hurts Hall. This would represent a new built form into the wider setting of the hall and would introduce a prominent industrial feature into its setting that would be incongruous with its current agricultural character.
- 9.6.17 National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section of the ES. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders.
- 9.6.18 The mitigation measures proposed can be found in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order.**
- 9.6.19 The final location of the Fromus Bridge has been amended to allow the retention of all significant non-plantation trees in this location including the oak and chestnut trees mentioned in the feedback. Impacts to trees are detailed within the **Application Document 6.10 Arboricultural Impact Assessment.**

### **Increase in Bridge Height Over River Fromus**

- 9.6.20 Several respondents commented that the proposed increase in height of the bridge over the River Fromus will create significant adverse landscape and visual impacts, and the bridge will look out of place in the landscape. Some commented that the new bridge height would impact the parkland aspect of the landscape.
- 9.6.21 Others commented that the construction ramps either side of the bridge have the potential to create surface water leading to an increased flood risk in the area which is already prone to flooding.

### **Summary of regard**

- 9.6.22 The height of the bridge over the River Fromus has been increased due to feedback National Grid received from the Environment Agency during Statutory consultation. The



Environment Agency has requested a bridge height of 6 m due to concerns regarding compliance with the Water Framework Directive. However, National Grid's preference is for a 4 m high bridge and so two bridge height options (4 m and 6 m) have been taken forward to the DCO submission whilst discussions continue with the Environment Agency.

- 9.6.23 The special nature of the landscape is acknowledged by National Grid. The effects arising from the Proposed Project on landscape and visual aspects have been assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. This Chapter includes proposed mitigation measures that have been embedded in the design to minimise the effects.
- 9.6.24 Flooding concerns are noted. **Application Document 6.8 Flood Risk Assessment** has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

### Construction of temporary pylons (if SPR do not construct Friston Substation)

- 9.6.25 A few respondents commented that National Grid is proposing to install temporary pylons in Friston, but that it did not follow the correct planning consent process, citing that the planning consent sought by ScottishPower Renewables made no mention of the Proposed Project, Nautilus or LionLink. One commented that they felt that this was 'underhand and planning by the back door' and another stated these are 'all separate projects and should not be tacked on in the hope that no-one will notice'.
- 9.6.26 One respondent was concerned that the temporary pylons would become permanent fixtures.

### Summary of regard

- 9.6.27 National Grid has always consulted on Friston Substation being within its DCO. Any temporary works associated with constructing the Friston Substation would be required whether National Grid construct it as part of the Proposed Project or whether it is constructed by National Grid, as agent, pursuant to the Scottish Power Renewables DCO. Any additional projects wishing to connect into the Friston Substation will have to include planning as part of their DCO process.
- 9.6.28 Temporary pylons are there to facilitate a diversion of the existing overhead lines to enable the new permanent pylons to be constructed. The temporary pylons will then be removed.

## Suffolk – Construction and Maintenance Works

### Changes to construction accesses

- 9.6.29 Several respondents raised concerns over the retention of the farm track that runs up to Hill Farm from the road to the south of the converter station site, citing that although National Grid has removed the southern access route via Redhouse Farm because it acknowledges that the roads to the south are unsuitable for construction traffic, this



farm track has been retained. It was presumed by the respondents that this track would be an unspecified access route.

### Summary of regard

- 9.6.30 Following feedback received at Targeted consultation, the retention of the farm track up to Hill Farm as a monitoring access has changed. This monitoring access has been moved to an access off the B1119. The farm access track will only be used to construct the drainage outfall from the converter station site and will only be used for this purpose.

### Changes to working hours to include Sunday and bank holiday working

- 9.6.31 Many respondents strongly objected to the proposal to introduce Sunday and bank holiday working, claiming that there would be no respite from construction noise, traffic, dust and vibration for people in Saxmundham, Benhall and Friston. Some commented that other construction projects in the area would create a cumulative impact, making the situation worse.
- 9.6.32 One respondent raised a concern over the impact on Sunday worship at St Johns's church if Sunday working is approved.

### Summary of regard

- 9.6.33 To give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, it has identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours. The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:
- Monday – Friday: 0700 to 1900; and
  - Saturday, Sunday and Bank Holidays: 0700 to 1700.
- 9.6.34 Whilst this change gives National Grid the flexibility to carry out works when and where needed, it does not expect construction activity to take place on every Sunday or bank holiday. There will be restrictions on the type of activity that can occur on these days and these will be secured via Requirement 7 of Schedule 3 in **Application Document 3.1 draft Development Consent Order**. The restrictions include limiting HGV and percussive piling activities. Further details of this mitigation are set out within the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured via Requirement 6 of Schedule 3 in **Application Document 3.1 draft Development Consent Order**.
- 9.6.35 Details relating to the proposed construction working hours and any associated restrictions are contained in **Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project**. The working hours are secured through Requirement 7 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## Suffolk – Addition of Land for Mitigation, Enhancement and Biodiversity Net Gain

- 9.6.36 One respondent welcomed the addition of land north of the A1094 and agreed with National Grid's intention for the land to be returned to heathland or acid grassland. They suggested that there is the potential for allowing a permissive path across this land to

connect with public right of way no. 16 which runs from the radio mast near the junction of public right of way nos. 1 and 13 to public right of way no. 6 where it connects with the A1094. They went on to state that National Grid would need to enter into land negotiations. A further suggestion was to create a permissive path from Saxmundham to Bigsby's Corner using land proposed for mitigation south of Saxmundham alongside the River Fromus.

### Summary of regard

- 9.6.37 The Proposed Project team greatly appreciate the insights of the local communities in how they can best mitigate any residual impacts on the environment and enhance the environment further than its baseline condition. The EIA process is responsible for establishing the baseline environmental condition of the Proposed Project area, which then determines the mitigation that National Grid must put in place. This is then discussed with the relevant statutory advisory services such as Natural England, Historic England and the Environment Agency. With regard to the feedback of the local community described in this report, this has been provided to and read by the environmental specialists who are responsible for determining the mitigation measures to be put in place and is actively being considered within the relevant Management Plans to be provided to the Main Works Contractors'. Mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## Suffolk – Strategy for Coordination

- 9.6.38 Several respondents felt that National Grid were considering each project in the area in isolation. It was stated by one that 'when consent was granted for the two Scottish Power projects, the planning authorities were not allowed to consider other projects planned to use the same connection point, like the Proposed Project, and indeed National Grid were not represented in the enquiry'.
- 9.6.39 Respondents commented that time and money would be saved if the construction of all projects in the area was coordinated.

### Summary of regard

- 9.6.40 National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities (see **Application Document 7.10 Coordination Document**).
- 9.6.41 National Grid has engaged with other project developers and the host local authorities, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. In doing so, National Grid acknowledges the respondents' concerns about the potential impacts of the Proposed Project and is committed to developing a scheme that takes account of the feedback received during the course of consultation to avoid or minimise as far as possible and to mitigate the significant effects of the construction and operation phases.

## Marine – Reduction to Marine HVDC Cable Route

- 9.6.42 Only one respondent raised an issue relating to the marine cable during Targeted consultation. They raised concerns over the impact on the marine environment given the length of the cable needed.
- 9.6.43 No feedback was received regarding the reduction of the marine cable route.

### Summary of regard

- 9.6.44 Depending on the location of the cable, between 10-20 m of seabed would be cleared as a result of the proposed changes. Drop Down Video or Remotely Operated Vehicle mounted cameras may be used to confirm the locations and extents of sensitive benthic habitats or features. This would inform micro-routeing of submarine cable systems to avoid or minimise interactions with these features in so far as practicable.
- 9.6.45 A total area of 0.15 km<sup>2</sup> of permanent loss of habitat is expected due to cable protection. Many of the habitats comprise subtidal muds and mixed sediments, which are widespread and of low value. The impacts on benthic ecology are presented in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology**.

## Kent – Permanent Infrastructure

### Realignment of HVDC cable route and change to construction method

- 9.6.46 No feedback was received during Targeted consultation that directly related to the realignment of the HVDC cable route, although one respondent commented that they found it worrying that the area of land that National Grid was using for the cables to come ashore has been extended. They stated that Pegwell Bay and Minster Marshes are valuable to wildlife.

### Summary of regard

- 9.6.47 The additional land within the Pegwell Bay intertidal area is required to securely anchor the vessel/barge that will be used to install the cable. This could entail the positioning of concrete anchor blocks. The amount of land proposed is sized:
- to allow a tracked vehicle to place the anchor blocks if required;
  - in the event that the anchors need to be manually placed; and
  - to give flexibility on the anchor positions.
- 9.6.48 National Grid acknowledges the ecological sensitivity of Minster Marshes and Pegwell Bay and as such the HVDC cable will be installed through Pegwell Bay using trenchless technology. The commitment to use trenchless technology is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. A detailed impact assessment is provided in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**.

### Increase in converter station height above ground by 2 m and ground improvements

- 9.6.49 Several issues were raised by respondents on National Grid's proposal to increase the height of the converter station in Kent above ground by 2 m. Many commented that the converter station would be visible for miles around. Some commented that National Grid

had failed to provide any visual illustrations in the consultation documents of what the converter station would look like in the local landscape and requested that these be provided.

- 9.6.50 Many respondents stated that large quantities of aggregates would be required to raise the level of the marsh and had concerns about where the material would come from and the noise associated with ground stabilisation construction works. In addition, many respondents were concerned that the ground stabilization works would cause more flooding in the local area leading to impacts on wildlife and pollution.
- 9.6.51 One respondent felt aggrieved that comments that were made relating to the choice of the converter station design during Statutory consultation were likely ignored.

## Summary of regard

- 9.6.52 National Grid acknowledges the impacts on the landscape setting and visual amenity. Landscape and visual impacts are included within the Proposed Project ES in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**.
- 9.6.53 National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section of the ES. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting, retention of existing vegetation where possible and has been designed in collaboration with relevant stakeholders and is contained in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 9.6.54 All mitigation planting associated with the permanent access road and Kent Converter Station and Substation will be maintained for the lifetime of the assets. This commitment is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Commitments and Actions (REAC)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 9.6.55 The landfill requirements for the Proposed Project have not yet been finalised. There is no intention that the source of landfill will come from Goodwin Sands.
- 9.6.56 Flooding concerns are noted and National Grid acknowledges that the ground raising has the potential to change the current land drainage regime. **Application Document 6.8 Flood Risk Assessment** has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.
- 9.6.57 Where the Proposed Project interacts with existing land drainage infrastructure, e.g. ditches, there is a commitment, secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**, to re-provide a suitable alternative means of land drainage such that the existing land drainage regime is not compromised.
- 9.6.58 At Statutory consultation views were sought over the architectural design approaches for the Kent converter station. National Grid is still developing its design for the Kent

Converter Station which will inform the detailed design approach within its DCO application (**Application Document 7.12.2 Design Principles – Kent**). The design contractor(s) will be required to follow the specific design codes and principles within this document.

### Confirmation of pylon location, number and design

- 9.6.59 Several respondents raised concerns over the impact of additional pylons on birds and mentioned that no mitigation measures such as platforms for kestrels, ravens and other birds had been provided. Several thought that the diagrams provided in the consultation documents did not contain the pylons that will be installed as part of the Nemo project which they considered to be misleading.

### Summary of regard

- 9.6.60 As part of the Proposed Project ES National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to **Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey** and the surveys are reported in **Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report**. The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. Bird diverters are to be included on the new section of overhead line. The potential impacts on birds in Kent is presented in **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity**.

## Kent – Construction and Maintenance Works

### Removal of construction compound to east of A256, increase in size of the compound west of the A256 and reduction in size of the compound north of converter station

- 9.6.61 One respondent raised concerns over the use of Marsh Farm Road citing that it is really a track used for tractors and totally unsuitable for construction lorries taking materials to and from the site.
- 9.6.62 Another respondent mentioned that although the compound to the north of the converter station had been reduced in size, they had concerns that heavy machinery and temporary surfaces would cause damage contributing to flooding. They highlighted that this land had been historically farmed in a way sensitive to the marshy soil.

### Summary of regard

- 9.6.63 A very low proportion of construction vehicles (circa 1% in total, and less than 1% HGVs) are expected to use Marsh Farm Road. This traffic is to construct the works to the west of the River Stour overhead line crossing only. All other construction traffic for construction of the new pylons and the diversion of the overhead line into the Converter and Substation will access site via the newly constructed bellmouth of the A256.
- 9.6.64 As a result of archaeological investigations and feedback received during the rounds of consultation, National Grid has now removed the large compound to the west of the A256, reinstated the compound to the north of the converter sites and introduced a small compound north of Ebbsfleet Lane North, west of the A256.



- 9.6.65 **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent** is provided to help mitigate any potential impacts. This document includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase and is secured through Requirement 6 of Schedule 3 of **Application 3.1 draft Development Consent Order**.
- 9.6.66 Flooding concerns are noted. **Application Document 6.8 Flood Risk Assessment** has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. There will be no significant effects on the water environment. The mitigation measures are secured through Requirement 6 of Schedule 3 of **Application 3.1 draft Development Consent Order**.

### **New construction compound at former hoverport in Pegwell Bay**

- 9.6.67 Many respondents raised several concerns regarding the use of the former hoverport site as a construction compound. The concerns raised are as follows:
- use of the site will limit access for residents and visitors, including the disabled who are currently able to access the area in mobility scooters;
  - additional traffic movements in Cliffsend;
  - its designation as a RAMSAR site and a National Nature Reserve;
  - biodiversity: it is a prime spot for birdwatching; has endangered species such as the bee orchid and lizard orchid; the Fiery clearwing and Cetti's warbler have been recorded; it provides a roosting place for wading birds; common seals breed on the edge of the saltmarsh;
  - potential historical contamination; and
  - limiting the future development of the site.

### **Summary of regard**

- 9.6.68 Following Targeted consultation, National Grid has reviewed the design of the Proposed Project. Under the amended design the hoverport site will not be used as a construction compound, although it will be retained as an access for construction and maintenance work within the mudflats.

### **Construction of temporary pylons during construction**

- 9.6.69 One respondent commented that the additional temporary pylons would require a hard standing and access to these for heavy machinery. They stated that the marsh will not recover from this destruction as evidenced by the fact that the land has not recovered since the installation of the cabling for the Nemo Link project.

### **Summary of regard**

- 9.6.70 The temporary pylons will be installed and removed as part of the programme of works. They will be there for the shortest duration possible, given the constraints in the area. National Grid is considering two options: temporary towers or masts. Temporary towers look like permanent towers and masts are slimmer towers held by anchor cables and/or

cable stays. Information on temporary installations can be found in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project and Application Document 2.14.2 Indicative General Arrangement Plans - Kent**.

- 9.6.71 Any temporary installations will be fully removed including the foundations up to 1.2 m below ground level; the area will be reinstated and Biodiversity Net Gain will be assessed as part of the Proposed Project EIA.

### Changes to working hours to include Sunday and bank holiday working

- 9.6.72 Many respondents strongly objected to the proposal to introduce Sunday and bank holiday working, claiming that there would be no respite from construction noise, traffic, dust and vibration.

### Summary of regard

- 9.6.73 To give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, it has identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours. The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:
- Monday – Friday: 0700 to 1900; and
  - Saturday, Sunday and Bank Holidays: 0700 to 1700.
- 9.6.74 Whilst this change gives National Grid the flexibility to carry out works when and where needed, it does not expect construction activity to take place on every Sunday or bank holiday. There will be restrictions on the type of activity that can occur on these days and this will be secured via Requirement 7 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**. The restrictions include limiting HGV and percussive piling activities.
- 9.6.75 Details relating to the proposed construction working hours and any associated restrictions are contained in **Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project**. The working hours are secured through Requirement 7 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## Kent – Addition of Land for Mitigation, Enhancement and Biodiversity Net Gain

- 9.6.76 One respondent commented that the land that has been identified for mitigation for impacts on the golden plover was not satisfactory and does not provide the correct habitat for the species. Another respondent questioned the rationale behind setting aside an area of land for birds to move to, claiming that birds will not ‘just move’.
- 9.6.77 Several respondents commented that although the draft order limits had been increased with new land added along the banks of the River Stour and south part of the Richborough to Canterbury 400 kV overhead line to provide additional foraging habitat for birds moving inland from Pegwell Bay, they felt that previous mitigation attempts at Minster have been appalling and inadequate. They cited poorly planted trees with no aftercare and suggested that the best environmental mitigation would be to leave the



farmers to farm their important agricultural land in a sustainable manner for the benefit of food security and biodiversity.

- 9.6.78 One respondent stated that they thought it was impossible to measure and therefore mitigate the impact of the Proposed Project as the impact to wildlife during both construction and operation is immeasurable. They raised concerns over the enforcement and ongoing maintenance of the mitigation measures.

## Summary of regard

- 9.6.79 Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**.
- 9.6.80 **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan** provides a framework for delivering the landscape and ecological mitigation strategy and the successful establishment and future management of the proposed landscape and ecology works associated with the Kent Onshore Scheme.
- 9.6.81 It sets out the short and long-term measures and practices that will be implemented by National Grid to establish, monitor and manage landscape and ecology mitigation and enhancement measures. It also provides a mechanism for the delivery of landscape and ecological measures to avoid, reduce or compensate for environmental effects identified in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**, **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.10 Arboricultural Impact Assessment**.
- 9.6.82 The Plan has been informed by consultation with stakeholders as part of the Statutory consultation and the landscape, ecology and arboriculture thematic meetings with the relevant stakeholders. It should be noted that as this is an outline document, which will be fully developed as the Proposed Project progresses into detailed design and prior to the commencement of works. National Grid will maintain a regular dialogue with statutory bodies and relevant stakeholders during this period. The Plan is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order**.

## 9.7 Summary

- 9.7.1 Table 9.10 provides a high-level summary of the feedback received during Targeted consultation, grouped in themes, together with National Grid's response. Only the feedback that is specifically related to the changes to the Proposed Project following Statutory consultation is summarised.
- 9.7.2 Section 17 of **Application Document 5.1.7 Appendix F Targeted Consultation** provides all the Section 42 feedback received verbatim, together with National Grid's response, and section 18 provides a more detailed, themed summary of the feedback from Section 47 and Section 48 respondents.

- 9.7.3 The table shows which type of consultee raised a particular issue. Where the feedback has led to a design change this is noted in the last column of the table with a simple Y for yes and N for no.

Table 9.10 Summary of Targeted consultation feedback relating to Proposed Project changes since Statutory consultation

| Ref.                        | Summary of issue                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|-----------------------------|--------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Landscape and visual</b> |                                                                          |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| LV1                         | Concerns regarding the increase in height of the Kent Converter Station. | X    | X    |      | X      | <p>National Grid acknowledges the concerns around the increase in height of the Minster Converter Station. The effects arising from the Kent Onshore Scheme on landscape character and visual amenity are summarised within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment</b> and <b>Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment</b>. This includes reference to the Kent Converter Station.</p> <p>National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b>. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders.</p> <p>Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>All planting associated with the reinstatement of the landfall and HVDC and HVAC corridors will be maintained for a five year period. All mitigation</p> | N             |

| Ref. | Summary of issue                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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|      |                                                         |      |      |      |        | planting associated with the permanent access road and Kent Converter Station and Substation will be maintained for the lifetime of the asset.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |
| LV2  | Increase in height of the bridge over the River Fromus. | X    | X    |      | X      | <p>The height of the bridge over the River Fromus has been increased due to feedback National Grid received from the Environment Agency during Statutory consultation. The Environment Agency has requested a bridge height of 6 m due to concerns regarding compliance with the Water Framework Directive. However, National Grid's preference is for a 4 m high bridge and so two bridge height options (4 m and 6 m) have been taken forward to the DCO submission.</p> <p>National Grid acknowledges the impacts on the landscape character and visual amenity. The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB are summarised within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b> and <b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b>. This includes reference to the River Fromus bridge options.</p> <p>National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b>. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders.</p> <p>Where necessary, and insofar as is possible, measures will be implemented to mitigate identified likely significant effects. The mitigation measures proposed can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b></p> | N             |

| Ref.                       | Summary of issue                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
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|                            |                                                                                   |      |      |      |        | <p>submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>A five-year aftercare period will be established for all reinstatement and mitigation planting along the HVDC and HVAC cable corridors. All planting associated with the Fromus Bridge, permanent access track and Saxmundham Converter Station will be managed and maintained for the life time of the asset.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| <b>Terrestrial ecology</b> |                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| TE1                        | Loss of woodland in relation to construction of the bridge over the River Fromus. | X    | X    |      | X      | <p>Following Statutory consultation, National Grid undertook a survey of all trees within the Order Limits of the Onshore Scheme. <b>Application Document 6.10 Arboricultural Impact Assessment</b> details how trees located within and immediately adjacent to the Order Limits will be protected and what mitigation measures are embedded in the design to offset the loss of trees. The tree survey has led to small changes in the routing of the cable and changes to the location of the Fromus Crossing to avoid significant trees. These changes were discussed with the relevant statutory consultees and consulted upon during the localised engagement which National; Grid undertook between November 2024 and January 2025 (more details are provided in Chapter 11 of this report). Protection zones will be established around remaining areas of woodland and/or trees to be retained.</p> <p>The Proposed Project is committed to achieving 10% Biodiversity Net Gain. Further details relating to the ecology assessment are contained in <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b>. The mitigation measures proposed can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured</p> | Y             |

| Ref. | Summary of issue                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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|      |                                                       |      |      |      |        | <p>through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order.</b></p> <p>Further details regarding Biodiversity Net Gain are contained in <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| TE2  | Concern over the impact of temporary pylons on birds. |      |      |      | X      | <p>Wherever possible National Grid has designed the cables associated with the Proposed Project to be underground. In some places it will be necessary to install overhead lines due to consideration of a range of factors concerning engineering feasibility, environmental impact and cost.</p> <p>As part of the Proposed Project ES National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to <b>Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey</b> and the surveys are reported in <b>Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report.</b> The Kent Onshore Route has been designed to reduce the number of towers required and a collision risk assessment has been undertaken and consulted upon with Natural England. Bird diverters are to be included on the new section of overhead line. The potential impacts on birds in Kent is presented in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity.</b> The mitigation measures concerning bird diverters can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order.</b></p> | N             |

| Ref. | Summary of issue                                                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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| TE3  | Concerns over the additional land taken for the Proposed Project within Pegwell Bay.                                                           |      | X    |      | X      | <p>The additional land within the Pegwell Bay intertidal area is required to securely anchor the vessel/barge that will be used to install the cable. This could entail the positioning of concrete anchor blocks. The amount of land proposed is sized:</p> <ul style="list-style-type: none"> <li>• to allow a tracked vehicle to place the anchor blocks if required;</li> <li>• in the event that the anchors need to be manually placed; and</li> <li>• to give flexibility on the anchor positions.</li> </ul> <p>National Grid acknowledges the ecological sensitivity of Minster Marshes and Pegwell Bay and as such the HVDC cable will be installed through Pegwell Bay using trenchless technology. A detailed impact assessment is provided in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity</b>. The commitment to using trenchless technology can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| TE4  | Request for reassurance that direct impacts to Goodwin Sands MCZ can be avoided and that rock protection for the crossing of other cables will |      |      |      | X      | <p>The Offshore Scheme has been re-routed to completely avoid the Goodwin Sands MCZ and as such, no direct impacts will occur. Goodwin Sands MCZ is still considered in the impact assessment for benthic ecology, (section 2.9 of <b>Application Document 6.2.4.2 Part 4 Marine Chapter 3 Benthic Ecology and Application Document 6.11 Marine Conservation Zone Assessment</b>). Re-routing of the cable has ensured that the cable protection required at crossings with the Nemo Link cable and the Thanet Offshore Wind Farm export cables will not occur within Goodwin Sands MCZ, nor will it overlap with any Annex I habitats that have been identified. Rock protection</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Y             |



| Ref. | Summary of issue                                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|      | not impact the MCZ.                                                                                                                                                                                                                      |      |      |      |        | at each cable crossing will total an area of 0.005 km <sup>2</sup> , leading to a loss of 0.025 km <sup>2</sup> , 0.01 km <sup>2</sup> , and 0.01 km <sup>2</sup> of sublittoral sands, sublittoral coarse sediment, and sublittoral mixed sediment, respectively. Given the prevalence of these sediment habitats within the wider North Sea area, the dominance of these habitats across the Offshore Scheme, and the small spatial scale of permanent losses, this effect is not expected to compromise the functional integrity of general habitats and species or diminish biodiversity at the regional scale.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| TE5  | Concern over potential impacts on: Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar, Outer Thames Estuary SPA, Margate and Long Sands SAC, Sandwich Bay SAC, Pegwell Bay NNR, Sandwich to Hacklinge Marshes SSSI. |      |      |      | X      | <p>There will be no habitat loss or degradation from the saltmarsh of Thanet Coast &amp; Sandwich Bay SPA/Ramsar, Sandwich Bay SAC, Pegwell Bay National Nature Reserve, or Sandwich Bay to Hacklinge Marshes SSSI. Additionally, the Offshore Scheme does not overlap with the Thanet Coast SAC or the Margate and Long Sands SAC and no habitat loss or direct impact will occur to these sites. There will also be no permanent loss of intertidal mudflat from these designations, as cable protection will be buried at this site and recovery following temporary disturbance is thought to be swift (see <b>Application Document 6.2.4.2 Part 4 Marine Chapter 3 Benthic Ecology</b>).</p> <p>There will be no disturbance of the coastal parts of these designations from the Kent Onshore Scheme as the trenchless installation launch location is sufficiently distant that noise modelling has shown that birds within these coastal areas will not be disturbed.</p> <p>Significant disturbance is also not expected to arise from the Offshore Scheme. Some noise disturbance of nesting birds in the inland part of the SSSI (specifically Weather Lees Hill woodland) may arise in the absence of mitigation but the Environmental Statement contains mitigation measures to control this including measures such as noise fencing or equivalent effective measures, and seasonal avoidance for some construction activities. Refer to <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and</b></p> | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|      |                                                                                                                                                                                                                                                                                                                                    |      |      |      |        | <p><b>Biodiversity and Application Document 6.6 Habitats Regulations Assessment Report</b> for full details. Refer to <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered</b> for the basis for choosing Pegwell Bay and the Minster area.</p> <p>Mitigation measures are listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| TE7  | Impacts of the Kent Onshore Scheme on the following:<br>Sandwich Bay and Hacklinge Marshes SSSI, Ash Level and South Richborough Pasture LWS, Sandwich and Pegwell Bay KWT Nature Reserve, Priority habitat of coastal saltmarsh, mudflats, coastal and floodplain grazing marsh, reedbeds, deciduous woodland, open mosaic, semi- |      |      |      | X      | <p>Impacts on Sandwich Bay &amp; Hacklinge Marshes SSSI are summarised above. There will be no significant effect on, and no habitat loss of, priority habitat coastal saltmarsh as part of the Kent Onshore Scheme. As part of the Kent Onshore Scheme there will be extensive habitat creation around Kent Substation and Converter Station as well as along the permanent access route and in places along the River Stour within Ash Level and South Richborough Pasture Local Wildlife Site. This will include the creation and enhancement of woodland, semi-natural grassland, and wetland (including reedbed) habitat. This leads to a conclusion of a significant positive effect in the long-term due to habitat creation and enhancement. Less than 200 m<sup>2</sup> of scrub within Woods &amp; Grassland Minster Marshes LWS would be removed, and only temporarily, leaving habitat connectivity along the rail corridor intact. Details are contained in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity</b>.</p> <p>Mitigation measures are listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |

| Ref.                     | Summary of issue                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|                          | improved grassland, intertidal substrate foreshore                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| <b>Water environment</b> |                                                                                                                |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| WE1                      | Concerns over the impact on the flood zone due to the construction of the larger bridge over the River Fromus. |      |      |      | X      | <p>The height of the bridge over the River Fromus has been increased due to feedback National Grid received from the Environment Agency during Statutory consultation. The Environment Agency has requested a bridge height of 6 m due to concerns regarding compliance with the Water Framework Directive. However, National Grid's preference is for a 4 m high bridge and so two bridge height options (4 m and 6 m) have been taken forward to the DCO submission.</p> <p>Flooding concerns are noted. <b>Application Document 6.8 Flood Risk Assessment</b> has been informed by information on historical and recent flooding incidents in the locality and by detailed modelling of the River Fromus and the proposed crossing. The modelling has demonstrated that the bridge design is such that there is no impact on the floodplain of the river and no negative impacts on flood risk.</p> <p>Surface water runoff arising from the Proposed Project during both its construction and operation would be captured, suitably treated where necessary and attenuated prior to discharge into the surrounding water environment at rates no greater than existing (inclusive of suitable climate change allowances over the Projects lifetime). In addition, where the project interacts with existing land drainage infrastructure, e.g. ditches, there is a Project commitment, secured through the DCO, to re-provide a suitable alternative means of land drainage such that the existing land drainage regime is not compromised.</p> | N             |

| Ref. | Summary of issue                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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| WE2  | Concerns that construction of the Kent Converter Station on raised ground within the flood plain will lead to increased flooding for outlying areas. | X    | X    |      | X      | Flooding concerns are noted and National Grid acknowledges that the ground raising has the potential to change the current land drainage regime. <b>Application Document 6.8 Flood Risk Assessment</b> has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. There will be no significant effects on the water environment. The mitigation measures are secured through commitments in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b> . | N             |
| WE3  | Impact of the construction of the Kent Converter Station on existing flood defences.                                                                 |      |      |      | X      | The DCO secures a commitment to monitor existing flood defences during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences. This commitment is contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC)</b> . Compliance with the REAC is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> .                                                                                                                                                                                                                                                                                                                                                                                                                       | N             |
| WE4  | Concerns regarding the impact of importing aggregate to raise the height of the land for the Kent Converter Station                                  |      |      |      | X      | Surface water runoff arising from the Proposed Project during both its construction and operation would be captured, suitably treated where necessary and attenuated prior to discharge into the surrounding water environment at rates no greater than existing (inclusive of suitable climate change allowances over the Projects lifetime). In addition, where the Proposed Project interacts with existing land drainage infrastructure, e.g. ditches, there is a commitment, secured through the DCO, to re-provide a                                                                                                                                                                                                                                                                                                                                                                                              | N             |

| Ref.                         | Summary of issue                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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|                              | will have on the hydrology of Minster Marshes and groundwater in the area.                                                             |      |      |      |        | suitable alternative means of land drainage such that the existing land drainage regime is not compromised.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| <b>Agriculture and soils</b> |                                                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| AS1                          | Concerns over the impacts on soils resulting from construction of the onshore cables and the Converter Station in Kent.                |      |      |      | X      | <p>During construction topsoil (and where necessary subsoil) would be removed from the affected area and stored appropriately for later use in reinstatement. All trenches will be reinstated to the level of the base of topsoil and the topsoil replaced.</p> <p>All soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (<b>Application Document 7.5.10.2 Outline Soil Management Plan - Kent</b>).</p> <p>Monitoring and management of the reinstatement is covered within <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent</b>. Both of these plans are secured Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| AS2                          | Query regarding where the aggregate required for construction of the Kent Converter Station will be sourced from, and whether it would |      |      |      | X      | The source of the material is yet to be determined and will not be agreed until National Grid's contractor has been appointed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N             |

| Ref.                         | Summary of issue                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
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|                              | be from Goodwin Sands.                                                              |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| AS3                          | Query regarding whether the aggregate will be tested for contamination.             |      |      |      | X      | All aggregate used in the construction of the Proposed Project will undergo rigorous testing to ensure it is suitable for use. Testing can include physical, mechanical and chemical properties such as contamination.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N             |
| AS4                          | Loss of BMV land in Kent due to change in use to accommodate Biodiversity Net Gain. |      | X    |      |        | <p>The Proposed Project includes a proposal to create 10 ha of habitat for golden plover. This does not require a change from the current arable use of this land but requires a change to cropping timings to maximise the extent of bare ground between October and December and minimisation of the use of herbicides and insecticides (to ensure a good supply of soil invertebrates as a food source for the golden plover). As such, arable production will be able to continue across this additional area in parallel with providing mitigation for bird species.</p> <p>Good practice soil handling and reinstatement measures are set out in <b>Application Document 7.5.10.2 Outline Soil Management Plan - Kent</b>. This will subsequently be updated prior to construction commencing to full details of the measures required to protect the soil resources and the land uses they support.</p> <p>No BMV land located within the Order Limits will be lost in order to accommodate Biodiversity Net Gain.</p> | N             |
| <b>Traffic and transport</b> |                                                                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| TT1                          | Impact of construction traffic on existing users                                    |      |      |      | X      | In response to feedback received during Statutory consultation, National Grid made amendments to several construction accesses, including adding or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Y             |

| Ref. | Summary of issue                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|---------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | of Jutes Lane (Kent).                                                                       |      |      |      |        | <p>removing accesses in some areas. The changes include removing the requirement for the majority of construction traffic to use Jutes Lane.</p> <p>Jutes Lane will only be utilised during construction of the required utility crossings in the area. This option was presented at Targeted consultation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| TT2  | Concerns regarding the unsuitability of Marsh Farm Road as a construction access road.      |      | X    |      | X      | <p>National Grid is aware of the limited capacity of the secondary accesses including Marsh Farm Road which will only be used to access the existing OHL for temporary diversion works, as well as to carry out vegetation clearance and survey works. The flow of construction vehicles on routes such as these have been limited, with the number of HGVs to be &lt;10 per day at the peak of the works. LGVs are largely vans and 4x4 vehicles for staff movements and again have been limited to a maximum of 25 per day at the peak. Significant adverse impacts are not anticipated.</p> <p><b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> is provided to help mitigate any potential impacts. This document includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase. This plan is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| TT3  | Concerns regarding the use of the farm track up to Hill Farm as a construction access road. |      | X    |      | X      | <p>9.7.4 Following feedback received at Targeted consultation, the retention of the farm track up to Hill Farm as a monitoring access has changed. This monitoring access has been moved to an access off the B1119. The farm access track will only be used to construct the drainage outfall from the Saxmundham converter station site and will only be used for this purpose.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Y             |
| TT4  | Concerns over traffic safety at                                                             |      | X    |      | X      | <p><b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> includes a review of the collision record (based on full collision</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |



| Ref. | Summary of issue                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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|      | Bigby's Corner; the junction of the A12 and the B1121.                                                                                               |      |      |      |        | data obtained from Suffolk County Council) and an assessment of Road Safety and Hazardous/Large Loads for the study area during the construction phase, including the A12/ B1121 junction and the B1121 Main Road to the south of Saxmundham. This 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 road safety of the B1121, with the proposed embedded mitigation and control and management measures in place, as identified within the <b>Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk</b> . This plan is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . Further consultation was held with Suffolk County Council as the ES was prepared.                                                                                                                                                                                                                                                                                                                                                             |               |
| TT5  | Concerns over the cumulative traffic impact resulting from the construction of the Proposed Project together with other planned projects in Suffolk. |      |      |      | X      | <p>It is acknowledged that Sea Link will be under construction alongside other schemes in the area. The assessment of inter-cumulative effects is considered within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b> based on <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List</b>, which includes more than 25 developments including Sizewell C Nuclear Power Station, East Anglia One North Offshore Windfarm, East Anglia Two Offshore Windfarm and LionLink. This includes assessment criteria relating to traffic and transport, as covered within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b>.</p> <p>Further to the above, National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Details are contained in <b>Application Document 7.10 Coordination Document</b>.</p> <p>The assessment takes account of the construction traffic management plans for other project traffic. National Grid's plans will be prepared considering the</p> | N             |

| Ref. | Summary of issue                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------|--------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                      |      |      |      |        | traffic plans for other project traffic, e.g. peak traffic movement times will be programmed in consideration of each other wherever possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| TT6  | Concerns regarding the impact of the transport of the aggregate required to stabilise the land for the Kent Converter Station.       |      |      |      | X      | The potential impact of increased traffic in Kent is considered in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport which includes an assessment of the vehicle movements associated with the transportation of all required construction materials, including those associated with the converter station which will be accessed via the main site access on the A256. The assessment demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network. <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> is provided to help mitigate any potential impacts. This document includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase. This plan is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . | N             |
| TT7  | Query over the design and use of the proposed access tracks at the eastern and western ends of the RSPB North Warren Nature Reserve. |      |      |      | X      | <p>The access track shown on the latest drawings is only for use during the construction of the Proposed Project not during operation.</p> <p>All routes in the submission drawings are linked to the cable corridor.</p> <p>Routes are for access by a 4 x 4 or a quad bike for monitoring during construction so will not require any surfacing unless agreed in advance that it is required by the RSPB.</p> <p>Monitoring as stated above will be by 4 x 4 or quad bike or by foot; there will be no requirement to leave any equipment within the North Warren Nature Reserve.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |

| Ref.                        | Summary of issue                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
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|                             |                                                                                                                                             |      |      |      |        | <p>In the event of a fault, National Grid will look to remove the cable from the duct it is in and replace the section of cable. Therefore, National Grid will not require access to the cable from the surface.</p> <p>National Grid will only require access during the construction phase of the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| <b>Health and wellbeing</b> |                                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| HW1                         | Concerns over the mental health and wellbeing of Suffolk residents due to the amount of National Grid projects planned in the Suffolk area. |      | X    |      | X      | <p>National Grid recognise that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. Throughout the development phase of the Proposed Project, National Grid have therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, National Grid have sought to provide certainty on the plans wherever possible.</p> <p>The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, National Grid have carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts.</p> <p>A complete assessment of health and wellbeing effects has been undertaken. This is set out in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing</b>. This concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>A Construction Code of Practice will help control and manage aspects of the development scheme that could affect health and wellbeing. Details are contained in <b>Application Document 7.5.3.1 CEMP Appendix A Outline</b></p> | N             |

| Ref.                                                                                                                                                    | Summary of issue                                                                                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Code of Construction Practice which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . |                                                                                                                                                                                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| Inter-project cumulative effects                                                                                                                        |                                                                                                                                                                                                     |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
| IP1                                                                                                                                                     | Concern that the cumulative assessment undertaken for the Proposed Project does not include a new offshore cable connecting Scotland with Kent meeting a landfall at Pegwell Bay.                   |      |      |      | X      | The proposed developments, including offshore cables, for which details are available on the relevant planning portals, in both Kent and Suffolk, have been included on the Long List for the inter-project cumulative assessment ( <b>Application Document 6.3.1.5.B Appendix 1.5.B Inter-Project Cumulative Effects Initial Long List</b> ). The scale, nature and location of these developments determines whether these developments are then moved to the short list for further assessment. <b>Application Document 6.2.3.13 ES Part 3 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</b> presents the assessment for short listed schemes in Kent. No project matching the details in IP1 has been identified although schemes at the early stages of planning and may not yet be logged on the relevant planning portals. | N             |
| IP2                                                                                                                                                     | Concerns regarding the cumulative impacts of infrastructure developments in Kent and whether future works will take place to add to the current proposals and previous developments, prolonging the |      |      |      | X      | <p>National Grid acknowledges that the Proposed Project will be under construction alongside other projects in the area and the potential for significant inter-cumulative effects has been assessed within <b>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects</b> for each discipline, including ecology and relevant ecological receptors. Further details relating to the full assessment is contained within this chapter.</p> <p>In addition to this, <b>Application Document 6.6 Habitat Regulations Assessment Report</b> includes an in-combination assessment of the impact of the Proposed Project with other projects. <b>Application Document 6.6 Habitat Regulations Assessment Report</b> states that the Proposed Project will not</p>                                                | N             |

| Ref. | Summary of issue                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
|------|------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | disturbance to birds.                                                                                                              |      |      |      |        | result in an adverse effect on the integrity of any European sites either alone or in combination with other plans or projects.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| IP3  | Concern that the Proposed Project would open the door for other projects leading to further disturbance and damage at Pegwell Bay. |      |      |      | X      | <p><b>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects</b> presents the assessment for short listed schemes in Kent and the ecology of Pegwell Bay has been considered. The developments included are those which have been defined to date on the relevant planning portals and it is not possible to speculate on further projects that may come forward in future.</p> <p>In addition to this, <b>Application Document 6.6 Habitat Regulations Assessment Report</b> includes an in-combination assessment of the impact of the Proposed Project with other projects. <b>Application Document 6.6 Habitat Regulations Assessment Report</b> states that the Proposed Project will not result in an adverse effect on the integrity of any European sites either alone or in combination with other plans or projects.</p> |               |

## Marine mammals

|     |                                                                                                                               |  |  |  |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |   |
|-----|-------------------------------------------------------------------------------------------------------------------------------|--|--|--|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| MM1 | Concern that there is no acknowledgement of the fact that Common Seals now breed on the edge of the saltmarsh in Pegwell Bay. |  |  |  | X | <p>The importance of the Stour and adjacent saltmarsh to important receptors has been considered as part of:</p> <ul style="list-style-type: none"> <li>• <b>Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries;</b></li> <li>• <b>Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology; and</b></li> <li>• <b>Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.</b></li> </ul> <p>Project specific monthly surveys were undertaken in the period September to November 2024 with the primary aim of determining the specific haul-out locations of the Pegwell Bay harbour seals (<b>Application Document</b></p> | N |
|-----|-------------------------------------------------------------------------------------------------------------------------------|--|--|--|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|

| Ref.               | Summary of issue                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
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|                    |                                                                                                                                                      |      |      |      |        | <b>6.4.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report</b> ). These individuals were noted to haul-out on the saltmarsh to the top of the river bank on high tide.                                                                                                                                                                                                                                                                                                                                                                                                          |               |
| MM2                | Concern over the lack of marine mammal surveys, particularly for seals.                                                                              |      |      |      | X      | Project specific monthly surveys were undertaken in the period September to November 2024 with the primary aim of determining the specific haul-out locations of the Pegwell Bay harbour seals ( <b>Application Document 6.4.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report</b> ). These individuals were noted to haul-out on the saltmarsh to the top of the river bank on high tide.                                                                                                                                                                                    | N             |
| <b>Ornithology</b> |                                                                                                                                                      |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| O1                 | Concern over the lack of mitigation measures for kestrels, ravens and other species to mitigate for the construction of temporary pylons in Suffolk. |      |      |      | X      | There is an existing overhead line in Suffolk on an adjacent alignment to the temporary pylons. Therefore, there will be no material change in collision risk.                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |
| O2                 | Query regarding what ways of reducing impacts on birds from the overhead lines will be used.                                                         |      |      |      | X      | <p>Bird diverters are being included on the new section of permanent overhead line in Kent, informed by a collision risk assessment which has been consulted upon with Natural England.</p> <p>As part of the Proposed Project ES National Grid commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to <b>Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey</b> and the surveys are</p> | N             |

| Ref. | Summary of issue                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Design change |
|------|----------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                        |      |      |      |        | <p>reported in <b>Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report</b>. The Kent Onshore Route has been designed to reduce the number of towers required and a collision risk assessment has been undertaken and consulted upon with Natural England. Bird diverters are to be included on the new section of overhead line. The potential impacts on birds in Kent is presented in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity</b>. The mitigation measures concerning bird diverters can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b>.</p> <p>No specific mitigation is identified as necessary for the temporary pylons in Suffolk or Kent because they are on the same, or a similar, alignment as the existing pylons and overhead lines.</p> |               |
| O3   | The impact on birds feeding or roosting from the additional land take in Pegwell Bay.                                                  |      | X    |      | X      | A detailed assessment of the impacts of construction works in Pegwell Bay on feeding and roosting waterbirds is presented in <b>Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology</b> . There will be no permanent loss of intertidal or saltmarsh habitats in Pegwell Bay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N             |
| O4   | Concerns over the location of the land that will be set aside and managed for the golden plover, and that it might not be suitable for |      |      |      | X      | The proposals adjacent to the A256 are not intended to meet any Biodiversity Net Gain requirement but are intended to specifically address the permanent loss of arable land functionally-linked to Thanet Coast and Sandwich Bay SPA/Ramsar. This habitat creation is intended to serve non-breeding golden plover and (to a lesser extent) breeding skylark. The proposals have been discussed with Natural England and consideration of noise and lighting impacts are included in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity</b> . Non-breeding bird surveys are being                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |



| Ref. | Summary of issue                                                                                                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
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|      | mitigation of Functionally Linked Land.                                                                                                                                 |      |      |      |        | <p>undertaken and have identified the presence of golden plover around the site. Detailed habitat management prescriptions are presented in <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b>.</p> <p>The mitigation measures concerning the habitat creation intended to serve the golden plover and the skylark can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b>.</p> |               |
| O5   | Request for more information to confirm that there is little difference in the bird collision risk impacts associated with the selection of full-height pylons in Kent. |      |      |      | X      | An assessment of collision risk is provided in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity</b> , with further detailed included in <b>Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report</b> . National Grid has reviewed available research and data and does not consider the difference in pylon type will materially change the risk of collision.                                                                                                                                                                                                                                                                           | N             |
| O6   | Request for further detail and clarity of how impacts would be avoided or minimised in the Stour and Minster Marshes area.                                              |      |      |      | X      | As part of the EIA for the Kent Onshore Scheme, extensive surveys for wintering and breeding birds including nocturnal surveys and 12 months of vantage point survey to inform the collision risk assessment for the new section of overhead line have been undertaken. Access to summaries of bird survey and ringing by landowners has also been provided to the applicant. The ES includes full assessments of impacts on birds including nesting Schedule 1 species such as Cetti's warbler and the non-breeding and breeding birds that use Abbey Farm Wetlands, the farmland south of the River Stour and the arable land north of the River Stour. The ES and outline                  | N             |

| Ref.                         | Summary of issue                                                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
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|                              |                                                                                                                                                           |      |      |      |        | Landscape and Ecological Management Plan contain mitigation proposals including enhancement of arable habitat offsite for golden plover, and skylark, and mitigation measures (including conventional measures such as close board fencing and some seasonal avoidance of particularly disturbing works). Noise and lighting assessments have also been included. Refer to <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity, Application Document 6.6 Habitats Regulations Assessment Report and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b> for full details. The mitigation measures can be found in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> submitted with the application for development consent. Compliance with the REAC is secured through Requirement 6 of Schedule 3 <b>Application Document 3.1 draft Development Consent Order</b> . |               |
| O7                           | Request that data from long-running ringing and monitoring efforts are included in the impact assessment for birds in the Stour and Minster Marshes area. |      |      |      | X      | Reports summarising bird ringing results for Minster Marshes have been provided by the relevant landowners and have been drawn upon for the ecological impact assessment work.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |
| <b>Alternative solutions</b> |                                                                                                                                                           |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| AS1                          | Concern that the question of what                                                                                                                         |      |      |      | X      | Reasoning behind the connection location for the Proposed Project and the alternatives considered have been addressed within <b>Application Document</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N             |

| Ref.          | Summary of issue                                                                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
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|               | alternative solutions National Grid has considered remains unanswered, and lack of application of the mitigation hierarchy.                                                                                                                                              |      |      |      |        | <p><b>6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered and Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.</b></p> <p>The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works.</p> |               |
| <b>Design</b> |                                                                                                                                                                                                                                                                          |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| D1            | Suggestions that National Grid took an underhand step to establish a major connection hub in East Suffolk without specific planning consent because if SPR do not construct the substation at Friston, National Grid would construct it as part of the Proposed Project. |      | X    |      | X      | National Grid has always consulted on Friston Substation being within its DCO. Any works associated with constructing the Friston Substation would be required whether National Grid construct it as part of the Proposed Project or whether it constructs it pursuant to the Scottish Power Renewables project. Any additional projects wishing to connect into the Friston Substation will have to include planning as part of their own process.                                                                                                                                   | N             |

| Ref. | Summary of issue                                                                                                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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| D2   | Request to provide a detailed assessment of the risks associated with trenchless technology and potential impacts to the surrounding environment and wildlife.                        |      |      |      | X      | National Grid can confirm that it is considering a range of different options to provide a trenchless solution. As standard practice, the options will be assessed against engineering, cost and environmental considerations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |
| D3   | Concern over the use of open cut trenching across the mudflats in Pegwell Bay. Request for appropriate mitigation to be in place to compensate for the loss of this priority habitat. |      |      |      | X      | Impacts to the mudflats within Pegwell Bay from cable installation activities have been assessed in <b>Application Document 6.2.4.2 Part 4 Offshore Scheme Chapter 3 Benthic Ecology</b> . The total area of expected temporary disturbance associated with the Suffolk Landfall is 0.0002 km <sup>2</sup> . Infaunal species associated with this habitat, such as <i>L. conchilega</i> , <i>M. balthica</i> and <i>H. diversicolor</i> , are known to exhibit rapid recovery to disturbance (McQuillan, et al., 2024; Tillin, et al., 2024). Therefore, intertidal mudflats have a low sensitivity to temporary physical disturbance. During installation, the footprint of disturbance will be limited and temporary. Additionally, this will also only have a temporary effect as fauna associated with these habitats are generally restricted to the top 30 cm of sediment (Ashley, Budd, Lloyd, & Watson, 2024), and thus recolonization is anticipated to be rapid (Lewis, Davenport, & Kelly, 2002). Therefore, due to the temporary and limited footprint compared to wider available area of habitat, and the understood ability for infaunal species associated with intertidal mudflat to exhibit rapid recovery to disturbance (McQuillan, et al., 2024; Tillin, et al., 2024), the physical disturbance and/or temporary loss of this habitat is predicted to be of small magnitude and not significant. | N             |

| Ref.              | Summary of issue                                                                                                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Design change |
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| D4                | Request for information on the length of time the temporary towers will be in place in Kent, how impacts will be mitigated and how restoration will take place. |      |      |      | X      | <p>The temporary towers will be installed and removed as part of the programme of works. They will be there for the shortest duration possible, given the constraints in the area.</p> <p>National Grid is considering two options: temporary towers or masts. Temporary towers look like permanent towers and masts are slimmer towers held by anchor cables and/or cable stays.</p> <p>Information on temporary installations can be found in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project and Application Document 2.14.2 Indicative General Arrangement Plans - Kent</b>.</p> <p>Any temporary installations will be fully removed including the foundations up to 1.2 m below ground level; the area will be reinstated and Biodiversity Net Gain will be assessed as part of the Proposed Project EIA.</p> | N             |
| D5                | Request to further investigate the use of underground cabling rather than pylons in Kent.                                                                       |      |      |      | X      | National Grid acknowledges this feedback and can confirm that it fully investigated alternatives to the provision of new pylons. Following the investigation, it was concluded that the potential for significant environmental impacts was greater with the option of going under the railway line and under the river than for the installation of overhead lines.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N             |
| <b>Needs case</b> |                                                                                                                                                                 |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| NC1               | Request to provide justification of the need to site the landfall north of Aldeburgh given new information available on the                                     |      | X    |      | X      | At the time that targeted consultation was undertaken, National Grid Ventures still had a connection offer for a connection at Friston substation for the Nautilus project. Until this offer is terminated, National Grid still needs to consider that the Nautilus project may still connect at Friston.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |

| Ref.                                    | Summary of issue                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                         | plans for the Nautilus project.                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| <b>Coordination with other projects</b> |                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| CP1                                     | Criticism that National Grid have not properly coordinated with developers of all the projects planned in the Suffolk area. |      | X    |      | X      | <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure. National Grid continues to work with other projects to explore opportunities for co-location and coordination.</p> <p>As part of the DCO submission, National Grid has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and location communities, see <b>Application Document 7.10 Coordination Document</b>.</p>                                                                                                                                                   | N             |
| <b>Timescales/programme</b>             |                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| TP1                                     | Objection to the plan to introduce Sunday and bank holiday working for the Proposed Project.                                |      | X    |      | X      | <p>The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:</p> <ul style="list-style-type: none"> <li>Monday – Friday: 0700 to 1900; and</li> <li>Saturday, Sunday and Bank Holidays: 0700 to 1700.</li> </ul> <p>To give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, they have identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours.</p> <p>Whilst this change gives National Grid the flexibility to carry out works when and where needed, it does not expect construction activity to take place on every Sunday or bank holiday. There will be restrictions on the type of activity</p> | N             |

| Ref.                                     | Summary of issue                                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                          |                                                                                                                   |      |      |      |        | that can occur on these days. The restrictions include limiting HGV and piling activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| <b>Walking, cycling and horse-riders</b> |                                                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| W1                                       | Concern over the impact of the proposed construction compound on the hoverport site on public access to the area. |      | X    |      | X      | <p>Following Targeted consultation, National Grid has reviewed the design of the Proposed Project. Under the amended design the hoverport site will not be used as a construction compound, although it will be retained as an access for construction and maintenance work within the mudflats.</p> <p>National Grid is rigorously assessing the Proposed Project's impact on footpaths adhering to the "mitigation hierarchy" by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where National Grid has a temporary impact on a PRow during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided.</p> <p>Impacts on footpaths in Kent are considered in <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>.</p> <p>National Grid has endeavoured to reduce impacts on PRow wherever possible. <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> have been prepared as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRow diversions, closures and management during the construction, operation and decommissioning phases. This plan is secured Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | Y             |



| Ref.                | Summary of issue                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|---------------------|------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| W2                  | Concern over the impact of construction works in Pegwell on PRow |      |      |      | X      | <p>National Grid is rigorously assessing the Proposed Project's impact on footpaths adhering to the "mitigation hierarchy" by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where National Grid has a temporary impact on a PRow during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided.</p> <p>Impacts on footpaths in Kent are considered in <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>.</p> <p>National Grid has endeavoured to reduce impacts on PRow wherever possible. An outline PRow Management Plan has been prepared for Kent as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRow diversions, closures and management during the construction, operation and decommissioning phases. See <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>. This plan is secured Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| W3                  | Impact of the Proposed Project on St Augustine Camino.           |      |      |      | X      | The Proposed Project does not interact with St Augustine Camino.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N             |
| <b>Consultation</b> |                                                                  |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| C1                  | Criticism over the timing of the Targeted                        |      | X    |      | X      | The Targeted consultation took place for a period of just under five weeks between July and August 2024. National Grid made the decision to undertake this further consultation in line with Government guidance, which                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |

| Ref. | Summary of issue                                                                | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|------|---------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | consultation exercise over the summer period.                                   |      |      |      |        | <p>sets out how such consultation should be proportionate to the scale of change proposed.</p> <p>Whilst some of the Targeted consultation period was during the school summer holidays, the webinars that were held to explain the changes being made to the plans in Suffolk and Kent took place prior to the start of the holiday period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |               |
| C2   | Criticism that the Targeted consultation did not follow the Gunning Principles. |      |      |      | X      | <p>National Grid has consulted on its proposals several times during the pre-application phase. The details of the events and the materials shared with the public as part of these consultations are all available on the Proposed Project website.</p> <p>As the Proposed Project has developed, National Grid has shown how the different options have been narrowed down, with consultation documents showing how feedback received has helped to inform the proposals. Additionally, this Consultation Report sets out National Grid's consideration of the more than 3,800 pieces of consultation feedback received across the various rounds of pre-application public consultation.</p> <p>National Grid believes this work meets the standards required by the Planning Inspectorate and the Secretary of State, and that the consultation that it has carried out has been in accordance with requirements of the Gunning Principles. The consultation strategy for the Proposed Project has been informed by engagement with the local planning authorities, and there are further stages in the DCO process which allow the planning authorities, the Planning Inspectorate, and others, to consider the adequacy of its consultation.</p> <p>Although Ofgem chose to hold a consultation relating to National Grid Ventures' Nautilus project during a similar timeframe to the Proposed</p> |               |

| Ref.                | Summary of issue                                                                                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                     |                                                                                                                                                                                                             |      |      |      |        | Project's Targeted consultation, it is important to note that the NGV project and Ofgem's consultation are independent of the Proposed Project.                                                                                                                                                                                                                                                                                                                               |               |
| C3                  | Criticism that National Grid did not listen to the feedback given at Statutory consultation.                                                                                                                |      |      |      | X      | National Grid has listened extensively to the views of stakeholders and the general public throughout the development of its proposals. <b>Application Document 5.1 Consultation Report</b> sets out how National Grid has had regard to feedback received during the consultation periods held.                                                                                                                                                                              |               |
| <b>DCO Process</b>  |                                                                                                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| DCO1                | Concern that National Grid has not followed the correct planning process regarding development at Friston Substation, and that the planning consent sought for SPR made no mention of the Proposed Project. |      |      |      | X      | <p>9.7.5 National Grid has always consulted on Friston Substation being within its DCO. Any works associated with constructing the Friston Substation would be required whether National Grid construct it as part of the Proposed Project or whether it constructs it pursuant to the Scottish Power Renewables project. Any additional projects wishing to connect into the Friston Substation will have to include planning as part of their own process.</p> <p>9.7.6</p> | N             |
| <b>Construction</b> |                                                                                                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |
| CO1                 | Concern over the use of the hoverport site as a                                                                                                                                                             | X    | X    |      | X      | Following Targeted consultation, National Grid has reviewed the design of the Proposed Project. Under the amended design the hoverport will not be                                                                                                                                                                                                                                                                                                                            | Y             |

| Ref. | Summary of issue                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
|------|------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | construction compound.                                                                         |      |      |      |        | used as a construction compound, although it will be retained as an access for construction and maintenance work within the mudflats.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |
| CO2  | Request for monitoring during construction to identify the need for any additional mitigation. |      |      |      | X      | Noise monitoring would be included adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI to confirm the mitigation measures met the required noise thresholds set out in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity. Application Document 7.5.3.2 CEMP Appendix A Register of Environmental Actions and Commitments (REAC)</b> commits to a Foundation Works Risk Assessment to be undertaken at trenchless crossing locations (by the contractor during detailed design) to minimise the risk of introducing new contamination and creating new contamination pathways. This will inform any additional mitigation that may be required beyond that already mentioned in the ES. The REAC also requires regular walkovers of the trenchless drill path to check for visible evidence of breakouts. | N             |

## 9.8 Responding to the Feedback

- 9.8.1 In accordance with Section 49 of the Planning Act, this Chapter demonstrates how National Grid has had regard to the matters raised within the relevant responses submitted to the Targeted consultation and whether feedback has led to design changes.
- 9.8.2 The tables contained in section 17 and 18 of **Application Document 5.1.7 Appendix F Targeted Consultation** and referenced within this Chapter provide a detailed record of the responses received to National Grid's Targeted consultation, and National Grid's response to these matters, in accordance with Section 49 of the Planning Act 2008.

## 9.9 Evolution of the Proposed Project in Response to Targeted Consultation Feedback

- 9.9.1 As set out in Chapter 3 of this report, Section 49 of the Planning Act 2008 requires National Grid to have regard to relevant responses received in response to consultation and publicity undertaken pursuant to Section 42, Section 47 and Section 48. This section of the report provides details of how the relevant responses have influenced the evolution of the Proposed Project.
- 9.9.2 The pre-application consultation for the Proposed Project informed the ongoing process of developing the proposals and influenced the iterative nature of the consultation approach and mitigation commitments. Further details are provided in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**.
- 9.9.3 At each stage of consultation, National Grid has reviewed the feedback received. Where appropriate, National Grid has sought to refine its proposals in response to the feedback from the consultation processes. National Grid has, in other cases, taken account of the responses in the preparation of **Application Document Volume 6 Environmental Statement** and other DCO application documents.
- 9.9.4 Following the conclusion of the targeted consultation process, National Grid undertook a review of all the responses that were received. Some of these responses led to changes to the Proposed Project, which are described in the Development of Design section and in Table 9.13, below. Where responses were received that National Grid considered either could not accommodate or should not lead to changes to the Proposed Project these are set out in Table 9.14, below.

## Development of Design

- 9.9.5 Following responses received from the Targeted consultation, National Grid has made changes to the Proposed Project.
- 9.9.6 The changes made are presented in Table 9.11.

Table 9.11 Changes to Proposed Project following Targeted consultation

| Area of change                                                       | Design change                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Suffolk Onshore Scheme</b>                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Permanent infrastructure</b>                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Fromus Crossing realignment                                          | The proposed crossing of the River Fromus has been rotated and moved 40 m north to avoid valuable trees.                                                                                                                                                                                                                                                                                                                       |
| Fromus Crossing bridge design                                        | Two bridge options are proposed: a 6 m high bridge and a preferred 4 m high bridge, subject to ongoing discussions with key environmental stakeholders.                                                                                                                                                                                                                                                                        |
| Access road alignment                                                | Following changes to the Fromus Crossing, the onward access road towards the Converter Station has been slightly realigned.                                                                                                                                                                                                                                                                                                    |
| Underground cable alignments                                         | Introducing more flexibility for routing the underground cables into Friston Substation, to allow better coordination of final routing with future projects, in a way that retains the functionality of landscape planting. Further flexibility has been introduced for routing the underground cables within an area east of Friston to allow avoid buried archaeology if necessary.                                          |
| <b>Construction and maintenance work</b>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Construction and maintenance compounds                               | Reintroducing areas of land adjacent to the proposed Converter Station at Saxmundham to provide more flexibility on where construction compounds can be located, reflecting ongoing coordination discussions with National Grid Ventures. Including flexibility in where to put construction compounds, allows National Grid Ventures more time to consider where to locate their own converter station within the wider site. |
| Friston Substation access road                                       | More flexibility has been introduced to the routing of the Friston Substation access road.                                                                                                                                                                                                                                                                                                                                     |
| Monitoring access road                                               | New and relocated monitoring accesses for potential joint bay locations off the B1119.                                                                                                                                                                                                                                                                                                                                         |
| <b>Mitigation, enhancement and approach to Biodiversity Net Gain</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Land adjustments                                                     | Areas for ecological mitigation and enhancement have been moved or refined based on stakeholder feedback.                                                                                                                                                                                                                                                                                                                      |
| Temporary mitigation                                                 | A new site for temporary mitigation has been chosen for better ecological outcomes.                                                                                                                                                                                                                                                                                                                                            |
| Skylark plots                                                        | Additional farmland will be adapted to support skylark nesting.                                                                                                                                                                                                                                                                                                                                                                |
| <b>Kent Onshore Scheme</b>                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Construction and maintenance compounds and methodologies</b>      |                                                                                                                                                                                                                                                                                                                                                                                                                                |

| Area of change                         | Design change                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Compound relocations and access        | Various construction compounds and access routes have been moved or removed to reduce archaeological impacts and avoid other utilities.                                                                                                                                                                                                                                                                                                                              |
| Hoverport use                          | A construction compound is no longer proposed on the former Pegwell Bay hoverport. The hoverport shall remain as part of the proposals only as part of the construction and maintenance phase access route from Sandwich Road to the mudflats.                                                                                                                                                                                                                       |
| Marine cable                           | The design now includes the possibility of taking the marine cable further inland, to the west of the A256. The compound area in this location has been enlarged to accommodate this.                                                                                                                                                                                                                                                                                |
| Traffic management                     | New construction traffic arising from the compound location changes will be managed through plans.                                                                                                                                                                                                                                                                                                                                                                   |
| Cable route                            | Minor adjustments to underground cable alignments.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Mitigation and enhancement land</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Land for birds                         | Following ongoing discussion with key stakeholders, an area of land previously shown to the south of the existing overhead line, included to provide additional foraging habitat for birds moving inland from Pegwell Bay, has been replaced with another area of land immediately to the west of the A256 further south. The strategy will now be to adapt existing farming practices on these arable fields in a way that is beneficial to important bird species. |

## Design Changes Not Made and Why

- 9.9.7 Some matters raised in response to the Targeted consultation related to proposed changes to the Proposed Project design. Due consideration was given by National Grid but ultimately these suggestions did not result in a design change.
- 9.9.8 In accordance with the August 2024 Advice on the Consultation Report Guidance, Table 9.14, below, provides a high-level summary (on a thematic basis using the themes set out in the consultation summary at Table 9.12) to explain why National Grid considered that some of the feedback received could not be accommodated or should not lead to changes to the project.



Table 9.12 Summary of principal matters raised during Targeted consultation that did not result in a design change

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Landscape and visual                  | <p data-bbox="539 387 1469 645">At the Targeted Consultation stage the potential for adverse impacts landscape and visual receptors were raised in some of the responses received as part of the targeted Consultation process as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>. These concerns include the height of Minster Converter Station</p> <p data-bbox="539 667 1465 992">Effects arising from the Kent Onshore Scheme on landscape character and visual amenity are summarised within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment and Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment</b>. This includes reference to the Kent Converter Station.</p> <p data-bbox="539 1014 1474 1238">Notwithstanding these proposed mitigation measures, National Grid accepts that the Proposed Project would unavoidably have some adverse landscape and visual impacts which are assessed in <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual and Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual</b>.</p> <p data-bbox="539 1261 1469 1406"><b>Application Document 7.1 Planning Statement</b> considers the landscape and visual impacts of the Proposed Project against the policy tests for NSIPs and concludes that these impacts are in accordance with national planning policy.</p> <p data-bbox="539 1429 1453 1653">Given that is it not practical to deliver the Proposed Project without any residual adverse landscape and visual impacts, and that these impacts have been mitigated and are consistent with national policy, National Grid considered that no further changes to the Proposed Project were required to address comments on landscape and visual impacts.</p> <p data-bbox="539 1675 1469 2033">Concern was also raised over the landscape and visual impacts of height of the proposed River Fromus bridge. The height of this bridge will be defined by the request of the Environment Agency for a bridge with a height of 6 m, based on the need to comply with the Water Framework Directive in relation to the River Fromus. National Grid has subsequently been in discussions with the Environment Agency and will introduce a change to the Proposed Project to reduce the height of this bridge if it is possible to do so whilst remaining compliant with the Water Framework Directive.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Terrestrial ecology                   | <p data-bbox="539 264 1453 479">At the Targeted Consultation stage the potential for adverse impacts on terrestrial ecology were raised in some of the responses received as part of the targeted Consultation process as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p data-bbox="539 506 1398 613">These concerns include the loss of trees around the River Fromus and concern over the impact of temporary pylons on birds as set out in Table 9.12, above.</p> <p data-bbox="539 640 1465 963"><b>Application Document 6.10 Arboricultural Impact Assessment</b> details how trees located within and immediately adjacent to the Order Limits will be protected and what mitigation measures are embedded in the design to offset the loss of trees. The Proposed Project is committed to achieving 10% Biodiversity Net Gain, which is considered to offset the loss of trees around the River Fromus crossing. Further details regarding Biodiversity Net Gain are contained in <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report</b>.</p> <p data-bbox="539 990 1458 1133">Bird diverters are to be included on the new section of overhead line. The potential impacts on birds in Kent is presented in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity</b>.</p> <p data-bbox="539 1160 1442 1411">As set out in the <b>Application Document 7.1 Planning Statement</b>, the Proposed Project is assessed to mitigate all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases.</p> <p data-bbox="539 1438 1465 1653">National Grid therefore considers that no additional changes are required to the Proposed Project to further reduce and mitigate impacts on terrestrial ecology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with the policies of NPS EN-1 NPS EN-5 that relate to the protection of ecological sites and features.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Water environment                     | <p data-bbox="539 264 1458 443">A number of responses relating to adverse impacts on the water environment were received as part of the Targeted Consultation, as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p data-bbox="539 470 1458 792">Concerns over the impact on the flood zone due to the construction of the larger bridge over the River Fromus, which are noted. <b>Application Document 6.8 Flood Risk Assessment</b> has been informed by information on historical and recent flooding incidents in the locality and by detailed modelling of the River Fromus and the proposed crossing. The modelling has demonstrated that the bridge design is such that there is no impact on the floodplain of the river and no negative impacts on flood risk.</p> <p data-bbox="539 819 1458 927">Concerns that construction of the Kent Converter Station on raised ground within the flood plain will lead to increased flooding for outlying areas.</p> <p data-bbox="539 954 1458 1240"><b>Application Document 6.8 Flood Risk Assessment</b> has been informed by information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. There will be no significant effects on the water environment. The mitigation measures are secured through commitments within the DCO application.</p> <p data-bbox="539 1267 1458 1411">Concerns were raised regarding the impact of importing aggregate to raise the height of the land for the Kent Converter Station will have on the hydrology of Minster Marshes and groundwater in the area.</p> <p data-bbox="539 1438 1458 1724">The full list of mitigation measures proposed to minimise impacts to the water environment during construction and operation is provided in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>. Measures relevant to the control and management of impacts during construction are outlined in <b>Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice</b>.</p> <p data-bbox="539 1751 1458 2002">National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the statutory consultation. As such, it is considered that the Proposed Project is in accordance with both national and local policy with regard to impacts on the water environment and that no further changes are considered necessary to make the Proposed Project consistent with national policy in this regard.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Agriculture and soils                 | <p data-bbox="539 264 1465 479">Concerns were raised over the loss of productive agricultural and Best and Most Versatile land in Suffolk and Kent, the impact of the Proposed Project on tenant farmers and concerns over the cable depth, as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p data-bbox="539 506 1436 685">A complete assessment of the impacts on agriculture in Suffolk and Kent have been undertaken and are included <b>Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils</b> and in <b>Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils</b>.</p> <p data-bbox="539 712 1465 891">Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan, see <b>Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk</b> and <b>Application Document 7.5.10.2 Outline Soil Management Plan - Kent</b>.</p> <p data-bbox="539 918 1458 1133">The impacts of the Proposed Project on agriculture and soils are assessed against national policy in <b>Application Document 7.1 Planning Statement</b> which concludes that the Proposed Project is in accordance with the national policies relating to the protection of agricultural land as the use of agricultural land and the permanent loss of land during construction is justified.</p> <p data-bbox="539 1160 1455 1339">National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to agriculture and soil impacts.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Traffic and transport                 | <p data-bbox="539 264 1426 443">Concerns regarding the unsuitability of Marsh Farm Road as a construction access road. This is summarised in Table 9.12, above and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation.</b></p> <p data-bbox="539 472 1465 904">National Grid is aware of the limited capacity of the secondary accesses including Marsh Farm Road which will only be used to access the existing OHL for temporary diversion works, as well as to carry out vegetation clearance and survey works. The flow of construction vehicles on routes such as these have been limited. <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> is provided to help mitigate any potential im-pacts. This document includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase.</p> <p data-bbox="539 934 1469 1518">Concerns over traffic safety at Bigby’s Corner; the junction of the A12 and the B1121. <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> includes a review of the collision record (based on full collision data obtained from Suffolk County Council) and an assessment of Road Safety and Hazardous/Large Loads for the study area during the construction phase, including the A12/ B1121 junction and the B1121 Main Road to the south of Saxmundham. This 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 road safety of the B1121, with the proposed embedded mitigation and control and management measures in place, as identified within the <b>Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk</b>. Further consultation was held with Suffolk County Council as the ES was prepared.</p> <p data-bbox="539 1547 1465 1868">Given that it is impossible to deliver the Proposed Project without at least some disruption of the traffic and transport networks and that no significant adverse effects are anticipated as a result of the construction phase National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to traffic and transport impacts.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Health and wellbeing                  | <p>Concerns over the mental health and wellbeing of Suffolk residents due to the amount of National Grid projects planned in the Suffolk area as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p>A complete assessment of health and wellbeing effects has been undertaken. This is set out in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing</b> and <b>Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing</b>. These conclude that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>National Grid considers that the information submitted with the DCO application addresses and responds to address the issues raised in the Statutory consultation, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to Health and wellbeing impacts.</p>                                 |
| Inter-project cumulative effects      | <p>Significant concerns regarding the impact of multiple energy projects on similar timescales. Concerns over the mental These are summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p>National Grid has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement.</p> <p>National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities, see <b>Application Document 7.10 Coordination Document</b>.</p> <p>National Grid considers that the measures included in this document provide an appropriate means of mitigating and controlling cumulative effects of a number of other projects.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| Marine mammals                        | <p>The potential for adverse impacts on marine mammals were raised in some of the responses received as part of the targeted Consultation process as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b> of this Report.</p> <p>Concerns were raised in regard particularly to Common seals breeding at Pegwell Bay, as well as the apparent lack of surveys. The EIA has been informed through desk based study and in-situ survey data. Specific to Pegwell Bay, data used from ZSL, 2021, Carter, et al 2022, and project specific monthly surveys undertaken Sept-Nov 2024 present data on seal haul outs and tracking data which have informed the assessment.</p> <p>Seals at Pegwell Bay are known to preferentially haul-out on the sandbanks in the channel of the River Stour at low tide, below line of sight of the main Bay. They are therefore, sheltered from any noise or activities occurring in the 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, (at least 1,100 m from any 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.</p> <p>Thus, sound propagation modelling which has informed the assessment, the location of the haul out sites, and the habituation of the seals to very close presence of regular vessel activity in the river and the short duration of activities in Pegwell Bay indicates any disturbance from construction activities is expected to be minor adverse and therefore not significant.</p> <p>With the application of embedded mitigations including, siting of infrastructure and temporary works; and Commitments made within <b>Application Document 7.5.3.2 Appendix B Register of Environmental Actions and Commitments (REAC)</b> it is not considered that any further changes to the Proposed Project are required to make it consistent with national policy and regulations.</p> |



The potential for adverse impacts on ornithological receptors were raised in some of the responses received as part of the targeted Consultation process as summarised in Table 9.12, above, and responded to in detail in section 17 and 18

**Application Document 5.1.7 Appendix F Targeted consultation.**

Concerns were raised in regard particularly to a lack of mitigation for certain species during construction of temporary pylons, Collision Risk impacts, impact to feeding/roosting birds from land take at Pegwell bay, Golden Plover mitigation land, and minimising impacts to birds in the Stour and Minster Marshes area.

The Proposed Project has been designed following the mitigation hierarchy, as defined in NPS EN-1: avoid, reduce, mitigate and compensate. In the first instances the potential to avoid or reduce ecology and biodiversity impacts and effects has been taken through the process of design development, and by embedding measures into the design of the Proposed Project. Where this is not possible, mitigation measures have been identified, and if mitigation is not possible then compensation has been explored.

The assessment of the effects of the Proposed Project on Ornithology receptors described in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**, considers the embedded, control and management measures as well as additional mitigation measures.

The impact assessment concludes that, although there will be a temporary overhead line diversion with temporary pylons, there is an existing overhead line in Suffolk on an adjacent alignment to the temporary pylons. Therefore, there will be no material change in collision risk.

Embedded measures have been integral in reducing, and where possible avoiding, the ecology and biodiversity effects of the Proposed Project. Measures that have been incorporated in regard to ornithology are vast and include but are not limited to:

- HVDC cables would be installed using a trenchless technique at the landfall to avoid direct impacts on Sandlings SPA or Leiston-Aldeburgh SSSI (B21).
- HVDC cables would be installed using a trenchless technique at the landfall to avoid direct impacts on Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay SAC (B42).
- Installation of overhead line pylons either side of Sandwich Bay to Hacklinge Marshes SSSI will not cover the entire breeding season but will either take place outside the bird breeding season or will only

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                                       | <p>occupy approximately two months of the breeding season (B45).</p> <ul style="list-style-type: none"> <li>• Programming the overhead line pylon base installation to avoid the core wintering bird period of October to February (B51).</li> <li>• Delivery of 10 ha of off-site arable enhancement land for SPA golden plover and for breeding skylark (B54).</li> <li>• Bird diverters on new section of overhead line, which are visible in low light conditions. It is considered that in the context of the Kent Onshore Scheme and species involved, that hanging deflectors, especially those with fluorescent markings offer the best solution to making the lines visible in adverse weather or low light conditions (B55).</li> <li>• Best practical means such as noise fencing or similar effective noise reduction methods around works areas where required to avoid significant disturbance and also prevent visual disturbance. Noise monitoring would be included adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI to confirm the mitigation measures met the required noise thresholds (B23).</li> </ul> <p>In summary, National Grid considers that no further changes are required to the Proposed Project to further reduce and mitigate impacts on ornithology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with NPS EN-1 NPS EN-5 and local planning policy relating to the protection of ecological sites and features.</p> |

Concerns were raised that the question of what alternative solutions National Grid has considered remains unanswered, and lack of application of the mitigation hierarchy. These are summarised in Table 9.12, above, and responded to in detail in section 17 and 18 **Application Document 5.1.7 Appendix F Targeted consultation**.

In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure.

National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.

It is recognised that in Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station.

This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.

National Grid (Sea Link), North Falls (Offshore Wind Farm) and Five Estuaries (Offshore Wind Farm) have been working together to explore the potential for offshore coordination as part of the Offshore Transmission Network Review 'Early Opportunities' workstream. The projects, acting together in a consortium led by North Falls, were awarded funding by the Department of Energy Security and Net Zero through the Offshore Coordination Support Scheme in December 2023.

On 28 March 2024, the consortium submitted a high-level feasibility study that formed the first step of the grant funding agreement. The study assessed the feasibility of a coordinated offshore connection specifically: the capital costs; building blocks; construction and commissioning methodologies and overall programme associated with a coordinated solution.

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                                       | <p>On 28 March 2024, the consortium submitted to the Secretary of State for Energy Security and Net Zero has reviewed this study, amongst other information and has decided not to grant further funding to the consortium. The feasibility study identified that coordination is technically feasible however, it also identified in the feasibility study</p> <ul style="list-style-type: none"> <li>• an increase in capital costs of up to £890 million;</li> <li>• constraint costs associated with an outage on Sea Link of over £500 million (this figure is attributed to the constraint costs associated with an outage on Sea Link in 2032/33 only); and</li> <li>• a programme delay for North Falls and Five Estuaries of up to five years.</li> </ul> <p>Given the significant extra costs and the negative impact on the delivery timeline of connecting more renewables to the UK energy system, especially considering the government's commitment to quadruple offshore wind and fully decarbonise the UK's electricity system by 2030, the consortium supports the Secretary of State's decision and will not be further pursuing a coordinated offshore connection.</p> |
| Design                                | <p>Request to provide further information relating to the design of the project as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p>National Grid has submitted a full suite of environmental information, including <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description</b> of the Proposed Project to explain the factors that have informed the design.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Needs case                            | <p>Query as to why the network between Suffolk and Kent needs to be reinforced as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p>The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030.</p> <p><b>Application Document 7.1 Planning Statement</b> sets out the need for the Proposed Project and is consistent with the 'critical national priority' for the provision of nationally significant low carbon infrastructure that is identified in National Policy Statement 1.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Coordination with other projects      | <p>Criticism was made that National Grid have not properly coordinated with developers of all the projects planned in the Suffolk area.</p> <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure. National Grid continues to work with other projects to explore opportunities for co-location and coordination.</p> <p>As part of the DCO submission, National Grid has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and location communities, see <b>Application Document 7.10 Coordination Document</b>.</p> <p>National Grid considers that this is an appropriate mechanism, for ensuring coordination with other projects and that no further changes are required.</p> |
| Timescales/programme                  | <p>Objection were raised to the plan to introduce Sunday and bank holiday working for the Proposed Project as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p>This change was required to give National Grid the flexibility to deliver the construction programme on time and incorporate standard industry working patterns, they have identified a need to include 7am to 5pm working on Sundays and bank holidays within the core working hours.</p> <p>The change is required to give National Grid the flexibility to carry out works when and where needed, it does not expect construction activity to take place on every Sunday or bank holiday.</p> <p>Whilst National Grid is confident of the timescales of the Proposed Project, there are no changes that can be made that will remove the risk to timescales and programme.</p>                                                 |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| Walking, cycling and horse-riders     | <p data-bbox="539 264 1461 336">Concern was expressed over impacts of the scheme on Walking, cycling and horse-rider networks.</p> <p data-bbox="539 360 1471 613">National Grid has endeavoured to reduce impacts on PRoW wherever possible. An outline PRoW Management Plan has been pre-pared for Kent as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRoW diversions, closures and management during the construction, operation and decommissioning phases.</p> <p data-bbox="539 638 1437 781">These are set out in <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk</b> and <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>.</p> <p data-bbox="539 806 1471 1059">National Grid has submitted <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk</b> and <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> which are considered to suitably mitigate the impacts of the Proposed Project on walking, cycling and horse-riders to the extent that no further changes to the Proposed Project are required.</p> |

| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Consultation                          | <p data-bbox="539 264 1461 443">Concerns were raised over the timing of the consultation, which took place for a period of just under five weeks between July and August 2024 as summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>.</p> <p data-bbox="539 470 1461 721">National Grid made the decision to undertake this further consultation in line with Government guidance, which sets out how such consultation should be proportionate to the scale of change proposed. Whilst some of the Targeted consultation period was during the school summer holidays, the webinars that were held to explain the changes being made to the plans in Suffolk and Kent took place prior to the start of the holiday period.</p> <p data-bbox="539 748 1461 1146">National Grid has consulted on its proposals several times during the pre-application phase. The details of the events and the materials shared with the public as part of these consultations are all available on the Proposed Project website. As the Proposed Project has developed, National Grid has shown how the different options have been narrowed down, with consultation documents showing how feedback received has helped to inform the proposals. Additionally, this Consultation Report sets out National Grid's consideration of the more than 3,800 pieces of consultation feedback received across the various rounds of pre-application public consultation.</p> <p data-bbox="539 1173 1461 1464">National Grid believes this work meets the standards required by the Planning Inspectorate and the Secretary of State, and that the consultation has been carried out in compliance with the Gunning Principles. The consultation strategy for the Proposed Project has been informed by engagement with the local planning authorities, and there are further stages in the DCO process which allow the planning authorities, the Planning Inspectorate, and others, to consider the adequacy of its consultation.</p> <p data-bbox="539 1491 1461 1594">National Grid considers that a comprehensive consultation programme has been carried out for the Proposed Project that is consistent with the requirements of the 2008 Planning Act.</p> |



| Issue raised in Targeted consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Construction                          | <p data-bbox="539 255 1465 439">Requests were made for monitoring during construction to identify the need for any additional mitigation. These are summarised in Table 9.12, above, and responded to in detail in section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation of this Report.</b></p> <p data-bbox="539 461 1465 972">Noise monitoring would be included adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI to confirm the mitigation measures met the required noise thresholds set out in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity. Application Document 7.5.3.2 CEMP Appendix A Register of Environmental Actions and Commitments (REAC)</b> commits to a Foundation Works Risk Assessment to be undertaken at trenchless crossing locations (by the contractor during detailed design) to minimise the risk of introducing new contamination and creating new contamination pathways. This will inform any additional mitigation that may be required beyond that already mentioned in the ES. The REAC also requires regular walkovers of the trenchless drill path to check for visible evidence of breakouts.</p> <p data-bbox="539 994 1465 1137">National Grid considers that the impacts of the Proposed Project are mitigated and controlled and that the submitted information is comprehensive, as such no further changes to the Proposed Project are required.</p> |

## Approach to Assessment and Proposed Mitigation Measures

- 9.9.9 Throughout the Proposed Project development National Grid has sought views from a range of prescribed bodies, relevant local authorities and statutory undertakers in order to prepare a robust Environmental Impact Assessment.

# 10. 2024-2025 Pre-Submission Engagement

## 10.1 Introduction

- 10.1.1 Following consideration of feedback received during Targeted consultation, held between 08 July 2024 and 11 August 2024, alongside engineering reviews and environmental assessments, a series of further minor amendments were made to the Proposed Project. The changes made are presented in Table 9.11 in the previous Chapter of this report and include:
- In Suffolk, the design changes comprised alterations to the crossing over the River Fromus, changes to construction and maintenance compounds, mitigation and enhancement land, and a series of other minor changes.
  - In Kent, design changes included alterations to construction and maintenance compounds and methodologies, and mitigation and enhancement land.
  - Project-wide changes were made to the approach to the delivery of Biodiversity Net Gain.
- 10.1.2 A systematic methodology was applied to identify the requirement, or otherwise, for further consultation or engagement in respect of the amendments to the Proposed Project. This involved the consideration of each design change against numerous criteria. These criteria included EIA considerations (i.e. if and how sections of the local community and receptors are affected); and landowner considerations (i.e. if new PILs are affected, or existing PILs differently affected).

## 10.2 Approach to Further Engagement

- 10.2.1 In light of the above, National Grid considered how best to consult upon the amendments to the Proposed Project.
- 10.2.2 Government guidance (April 2024) on the Planning Act 2008 pre-application stage, states that once applicants have completed the consultation process set out in their SoCC, (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) unless amendments to the proposed application in the light of responses to consultation materially and substantially change the proposed application, or materially change its effects as a whole, this should not trigger a need for further consultation.
- 10.2.3 In essence, the guidance requires that only where the project taken as a whole, changes very significantly (i.e. fundamentally different from what was previously consulted on), should re-consultation on the proposed application as a whole be considered.
- 10.2.4 The following criteria provide the basis for assessing whether the proposed changes were material and substantial:
- the degree of change as compared to the proposals previously consulted upon as a whole;
  - the number of materially worse environmental effects as compared to what has been the subject of previous consultations; and

- the level of public interest, and the likelihood that such interest would merit further consideration in the context of that change.

10.2.5 The guidance advises that for any material change to a part of the proposed application where the project as a whole is not fundamentally changed, a bespoke and targeted approach to further consultation can be adopted, which can address the specific consultation obligations arising proportionately.

10.2.6 Since these amendments were judged to not fundamentally change the proposals that have previously been the subject of formal consultation, National Grid sought proportionate engagement with relevant stakeholders prior to submission of the Development Consent Order application and carried out any necessary statutory consultation with any affected S42(1)(d) PILS. This round of consultation has been named 'Pre-Submission Engagement' and was held between 22 November 2024 and 12 January 2025.

### 10.3 Who National Grid Consulted for Pre-Submission Engagement

10.3.1 A systematic methodology was used to identify the requirement, or otherwise, for further consultation or engagement. This involved the consideration of each design change against a number of criteria, all in the context of the policy and guidance summarised above.

10.3.2 These criteria include EIA considerations (i.e. whether the change affects Preliminary Environmental Information conclusions); community and residential considerations (i.e. if and how sections of the local community are affected); and landowner considerations (i.e. if new PILs are affected, or existing PILs differently affected).

10.3.3 Stakeholders assessed as having an interest in specific changes, based on feedback received in response to Targeted consultation, (see section 17 and 18 of **Application Document 5.1.7 Appendix F Targeted consultation**) or those considered to be directly affected (informed by a desktop GIS analysis exercise) were consulted. The views of the relevant Host Authorities (East Suffolk Council, Suffolk County Council, Dover District Council, Thanet District Council and Kent County Council) were sought for all design changes in their respective administrative areas. A summary of all other stakeholders notified for each design change is set out in Table 10.1 below

Table 10.1 Summary of stakeholders identified for Pre-submission engagement

| Area of change                                                | Stakeholders notified                                                                                                                                                                                                                                      |
|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Suffolk Onshore Scheme                                        |                                                                                                                                                                                                                                                            |
| Permanent infrastructure                                      |                                                                                                                                                                                                                                                            |
| River Fromus bridge realignment                               | Newly or differently affected persons with an interest in land<br>Saxmundham Town Council<br>The Environment Agency<br>Historic England<br>Natural England<br>Occupiers of Hurts Hall<br>Host Authorities                                                  |
| River Fromus bridge design                                    |                                                                                                                                                                                                                                                            |
| Access road alignment                                         |                                                                                                                                                                                                                                                            |
| Underground cable alignments                                  |                                                                                                                                                                                                                                                            |
| Construction and maintenance work                             |                                                                                                                                                                                                                                                            |
| Construction and maintenance compounds                        | Newly or differently affected persons with an interest in land<br>Saxmundham Town Council<br>The Environment Agency<br>Historic England<br>Occupiers of nearby properties<br>NGV<br>Host Authorities                                                       |
| Friston Substation access road                                |                                                                                                                                                                                                                                                            |
| Monitoring access road                                        |                                                                                                                                                                                                                                                            |
| Mitigation, enhancement and approach to Biodiversity Net Gain |                                                                                                                                                                                                                                                            |
| Land adjustments                                              | Newly or differently affected persons with an interest in land<br>Parish Council<br>The Environment Agency<br>Historic England<br>Natural England<br>Occupiers of nearby properties<br>SPR (East Anglia ONE North and East Anglia TWO)<br>Host Authorities |
|                                                               |                                                                                                                                                                                                                                                            |
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|                                                               |                                                                                                                                                                                                                                                            |
|                                                               |                                                                                                                                                                                                                                                            |

| Area of change                                                  | Stakeholders notified                                                                                                                                                       |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Temporary mitigation                                            | Newly or differently affected persons with an interest in land                                                                                                              |
| Skylark plots                                                   | Natural England<br>Host Authorities                                                                                                                                         |
| <b>Kent Onshore Scheme</b>                                      |                                                                                                                                                                             |
| <b>Construction and maintenance compounds and methodologies</b> |                                                                                                                                                                             |
| Compound relocations and access                                 | Newly or differently affected persons with an interest in land                                                                                                              |
| Marine cable                                                    | Minster Parish Council<br>The Environment Agency                                                                                                                            |
| Traffic management                                              | River Stour IDB                                                                                                                                                             |
| Hoverport use                                                   | Historic England<br>Natural England<br>Great Oaks Small School<br>Kent Wildlife Trust<br>Specific local residents (identified according to likelihood of potential effects) |
| Cable route                                                     | Newly or differently affected persons with an interest in land<br>Historic England<br>Host Authorities                                                                      |
| <b>Mitigation and enhancement land</b>                          |                                                                                                                                                                             |
| Land for birds                                                  | Newly of differently affected persons with an interest in land<br>Natural England<br>Host Authorities                                                                       |

## Section 42(1)(a): Identification of Prescribed Bodies

- 10.3.4 Letters (see section 2 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**) were sent by email to specific Section 42(1)(a) bodies on 22 November 2024. Due to the focused, non-statutory nature of this consultation the letters were tailored to each consultee, pertaining to the changes for which National Grid was seeking their views. The letters were accompanied by plans showing changes to the draft Order Limits and, where relevant, additional PEI. The letters signposted to the Proposed Project website, where a new tab in the document library called 'Project update and further engagement (Nov 2024)' presented updated General Arrangement Plans; graphics of the updated design; a note summarising changes; and a technical note summarising the PEI effects on a designated heritage asset in Suffolk, see section 3 to 6 **Application Document 5.1.9 Appendix H Pre-Submission Engagement**.
- 10.3.5 Since this engagement was not treated as a formal consultation exercise, no Section 48 notice was issued. A full list of the bodies consulted under Section 42(1)(a), is set out in Table 10.1 above.

## Section 42(1)(aa): Identification of Prescribed Bodies

- 10.3.6 While the Proposed Project is, in part, located offshore in English waters, none of the design changes were identified as being within an area of the Marine Management Organisation jurisdiction and as such, they were not engaged with at this stage.

## Identification of Parish Councils

- 10.3.7 A limited number of parish councils were included amongst the Prescribed Bodies for this period of engagement. The relevant parish councils were written to according to the nature of the design change(s) and the potential effects upon the communities they represent, see Table 10.1.

## Section 42(1)(b): Identification of Local Authorities

- 10.3.8 Given the focused, non-statutory nature of this consultation, letters (see section 2 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**) were sent by email to Section 42(1)(b) Host Authorities on 22 November 2024. The letters were tailored to each consultee, pertaining to the changes for which National Grid was seeking their views. The letters were accompanied by plans showing changes to the draft Order Limits and, where relevant, additional PEI. The letters signposted to the project website, where a new tab in the document library called 'Project update and further engagement (Nov 2024)' presented updated General Arrangement Plans; graphics of the updated design; a note summarising changes; and a technical note summarising the PEI effects on a designated heritage asset in Suffolk, see section 3 to 6 **Application Document 5.1.9 Appendix H Pre-Submission Engagement**.
- 10.3.9 Any new landowners, not previously consulted, were consulted on a statutory basis under Section 42(1)d of the Planning Act 2008. All other consultation/engagement was non-statutory.

## Section 42(1)(d) Parties

- 10.3.10 In advance of the Pre-submission engagement, National Grid carried out diligent inquiries on the additional land required. The diligent inquiries identified persons who were not previously consulted under Section 42(1)(d) during the Statutory consultation carried out between 24 October 2023 and 18 December 2023 and the Targeted consultation carried out between 08 July and 11 August 2024. These persons are listed in section 1 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**. National Grid also identified persons with interests in land required who had previously been consulted under Section 42(1)(d) during the Statutory consultation carried out between 24 October 2023 and 18 December 2023 and the Targeted consultation carried out between 08 July and 11 August 2024, but whom National Grid considered may be differently affected by the proposed amendments to the Proposed Project. These persons are listed in section 1 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**.

## Letters

- 10.3.11 On 22 November 2024, 112 Parties (relating to 113 interests) were notified by letter (see section 2 of Application Document 5.1.9 Appendix H Pre-Submission Engagement) and site notices were posted. The relevant land interests were written to according to the nature of the design change(s) and the potential effects upon their land, as set out in

Table 10.1 above. These persons are listed in Table 1.1 of section 1 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**.

- 10.3.12 Through further diligent inquiries, five further PILs were identified shortly before the intended DCO submission who were not previously consulted under Section 42(1)(d) during the Statutory consultation carried out between 24 October 2023 and 18 December 2023, the Targeted consultation carried out between 08 July and 11 August 2024, or the Pre-submission engagement carried out between the 22 November 2024 and the 12 January 2025. These persons are listed in Table 1.2 of section 1 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**.
- 10.3.13 Three of these newly identified PILs were issued with consultation packs after the close of Pre-submission engagement, which were delivered between 15 February 2025 and 20 February 2025. The further two PILs were identified very shortly before the submission of the application, and accordingly a letter was issued including details of the project, where further information can be found, how to get in touch with National Grid, and how there will be an opportunity to provide comments to the Planning Inspectorate (PINs) once the Development Consent Order (DCO) application has been submitted. This is accordance with paragraph 24 of the Planning Act 2008: Guidance on the Pre-application stage for NSIPS (MHCLG), 2024).
- 10.3.14 The three PILs who received their consultation packs between the 15 and 20 February 2025 were also followed up and written to in the same terms, and provided with details explaining how there will be an opportunity to provide comments to the Planning Inspectorate (PINs) once the Development Consent Order (DCO) application has been submitted.

## Notification to the Planning Inspectorate

- 10.3.15 Due to the non-statutory nature of this Pre-submission engagement, National Grid did not notify the Planning Inspectorate.

## Section 47 Consultees

- 10.3.16 Section 47 of the Planning Act 2008 sets out an applicant's duty to consult the local community about a proposed application. Five community and residential stakeholders, identified according to the likelihood of potential effects, see Table 10.1 above (see section 2 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**) were notified by letter on 22 November 2024 (see section 2 of **Application Document 5.1.9 Appendix H Pre-Submission Engagement**). This was done in line with the SoCC (see section 6 of **Application Document 5.1.5 Appendix D SoCC**) which was published on 18 October 2023. The SoCC allowed for future targeted consultations to be held in accordance with the principles and methods set out in the SoCC (paragraph 4.3.1).

## Advertising and Publicity

- 10.3.17 The pre-submission engagement was not widely publicised, since the focus was on the consultees identified in Table 10.1 above. As this was an informal engagement exercise there was no requirement for newspaper notices to be published, however the dedicated Proposed Project website was updated accordingly regarding the Pre-submission engagement.



## 10.4 Analysis of Responses Received

### Number and Format of Responses

- 10.4.1

A total of 299 relevant responses were submitted to National Grid in response to the Pre-submission engagement between 22 November 2024 and 12 January 2025. That number includes responses received after the deadline, which were accepted by National Grid on a discretionary basis.
- 10.4.2

Table 10.2 provides a breakdown of the number of responses per consultee category. As respondents online did not identify if they were responding to Section 47 consultation or Section 48 publicity, this chapter discusses the relevant responses from non-Section 42 consultees as both Section 47 and Section 48 respondents.

Table 10.2 Number of responses per consultee category

| Consultee category                                                      | Number of responses |
|-------------------------------------------------------------------------|---------------------|
| Section 42(1)(a) statutory consultees (including statutory undertakers) | 3                   |
| Section 42(1)(b) relevant local authorities                             | 9                   |
| Section 42(1)(d) people with an interest in the land                    | 12                  |
| Section 47 and Section 48 consultees                                    | 275                 |

### Consultation Analysis Method

- 10.4.3

For all feedback received a coding tree was developed to categorise the feedback into themes. The codes used were based on the scope of the Proposed Project and the topics considered in the Preliminary Environmental Information Report. The number of codes totalled 56 and, for ease of reference, these topics are grouped under the headings of Terrestrial, Marine, Project-Wide and Additional in Table 8.2 in Chapter 8.
- 10.4.4

A consultation response could be allocated up to three codes to highlight the different themes or elements of the Proposed Project covered. To assist the Proposed Project team in identifying which scheme was being commented on, the feedback was also categorised into either Suffolk, Kent or General. The sentiment of the comment was then added (either positive, negative or neutral) and whether the comment could be considered a suggestion.
- 10.4.5

All feedback, regardless of origin, was reviewed and assigned a code or codes. Following the coding exercise, all coding was reviewed to ensure that codes had been applied in a consistent manner.

## 10.5 Responding to the Feedback

- 10.5.1

This section provides a summary of the key issues arising in the feedback received during the Pre-submission engagement undertaken between 22 November 2025 and 12 January 2025. Any new landowners, not previously consulted, were consulted on a

statutory basis under Section 42(1)d of the Planning Act 2008. All other engagement was non-statutory.

10.5.2 Responses were received from the following Section 42(1)(a) and Section 42(1)(b) bodies:

- Aldeburgh Town Council;
- Anglian Water;
- Benhall and Sternfield Parish Council;
- East Suffolk County Council;
- Kelsale-cum-Carlton Parish Council;
- Kent County Council;
- Saxmundham Town Council;
- Snape Parish Council;
- Suffolk County Council;
- Thanet District Council;
- Thanet OFTO; and
- The Ramsgate Society.

10.5.3 In addition, responses were received from 12 PILs. Out of the 299 responses received during the Pre-submission engagement, 275 were received from Section 47 and Section 48 respondents.

10.5.4 A significant amount of the feedback received during Pre-submission engagement was not directly related to the scheme changes consulted on, i.e. much of the feedback was the same as that received during either the Statutory or the Targeted consultation.

10.5.5 Chapter 8 and sections 24 and 25 of **Application Document 5.1.6 Appendix E Statutory Consultation** provide the relevant responses received at Statutory consultation together with National Grid's regard had, and Chapter 9 and sections 17 and 18 of **Application Document 5.1.7 Appendix F Targeted Consultation** provide the relevant responses received at Targeted consultation together with National Grid's regard had. A summary of the feedback received in response to the Pre-submission engagement and issues that were common to Statutory consultation and Targeted consultation are provided in Table 10.3, together with the location within the appendices of where the regard had can be found. If anything different was raised on the same topic, or if something had changes between Pre-submission engagement, Targeted consultation and Statutory consultation, this is addressed in Sections 24 and 25 of **Application Document 5.1.7 Appendix F Targeted Consultation**, and is summarised in Table 9.12.

Table 10.3 Key themes of feedback common to Pre-submission engagement and Statutory and Targeted consultation

| Theme                    | Summary of feedback                                                                                                                                                                                                                                                                                                                                                                                      | Location of regard had                                                 |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| Landscape and visual     | <ul style="list-style-type: none"> <li>• Development in an Area of Outstanding Beauty.</li> <li>• Visual impact on historic landscape, heritage coast and sites of cultural significance.</li> <li>• Light pollution.</li> </ul>                                                                                                                                                                         | Appendix E, Section 25, Table 1.1                                      |
| Terrestrial ecology      | <ul style="list-style-type: none"> <li>• Construction in designated sites.</li> <li>• Impact on wildlife in Minster Marshes and Pegwell Bay.</li> <li>• Lack of sufficient ecological surveys.</li> <li>• Construction in an area already damaged by the Nemo Link.</li> <li>• A trenchless solution for constructing the cable under the North Warren Nature Reserve has not been confirmed.</li> </ul> | Appendix E, Section 25, Table 1.2<br>Appendix F, Section 18, Table 1.2 |
| Water environment        | <ul style="list-style-type: none"> <li>• Construction in a flood plain increasing the risk of flooding in other areas.</li> <li>• Runoff from hardstanding causing pollution in local water bodies.</li> <li>• Impact on the expansion of Weatherlees sewage treatment plant.</li> </ul>                                                                                                                 | Appendix E, Section 25, Table 1.4                                      |
| Geology and hydrogeology | <ul style="list-style-type: none"> <li>• Impact on the Coralline Crag.</li> </ul>                                                                                                                                                                                                                                                                                                                        | Appendix E, Section 25, Table 1.5                                      |
| Agriculture and soils    | <ul style="list-style-type: none"> <li>• Loss of agricultural land.</li> </ul>                                                                                                                                                                                                                                                                                                                           | Appendix E, Section 25, Table 1.6                                      |
| Traffic and transport    | <ul style="list-style-type: none"> <li>• Increased traffic on local road network in Suffolk and Kent.</li> <li>• Impact of Saxmundham Converter Station access road from Bigsby Corner.</li> <li>• Traffic associated with transporting large volumes of aggregate needed for the construction of the Kent Converter Station.</li> <li>• Use of Hill Farm track as an access.</li> </ul>                 | Appendix E, Section 25, Table 1.7<br>Appendix F, Section 18, Table 1.5 |

| Theme                                  | Summary of feedback                                                                                                                                                                                                                                                                     | Location of regard had                                                       |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Noise                                  | <ul style="list-style-type: none"> <li>Noise pollution during operation.</li> </ul>                                                                                                                                                                                                     | Appendix E, Section 25, Table 1.9                                            |
| Socio-economic, recreation and tourism | <ul style="list-style-type: none"> <li>Impact on tourist industry.</li> <li>Availability of accommodation for construction workers.</li> </ul>                                                                                                                                          | Appendix E, Section 25, Table 1.10                                           |
| Health and wellbeing                   | <ul style="list-style-type: none"> <li>Impact on mental health during construction.</li> </ul>                                                                                                                                                                                          | Appendix E, Section 25, Table 1.11                                           |
| Inter-project cumulative effects       | <ul style="list-style-type: none"> <li>The cumulative impact of many projects in both Suffolk and Kent.</li> </ul>                                                                                                                                                                      | Appendix E, Section 25, Table 1.12                                           |
| Marine mammals                         | <ul style="list-style-type: none"> <li>Impact on seals in Pegwell Bay.</li> </ul>                                                                                                                                                                                                       | Appendix E, Section 25, Table 1.16                                           |
| Ornithology                            | <ul style="list-style-type: none"> <li>Impact of overhead lines on birds.</li> <li>Impact on migratory birds in Pegwell Bay (East Atlantic Flyway).</li> <li>Lack of nesting platforms for kestrels and ravens.</li> </ul>                                                              | Appendix E, Section 25, Table 1.17                                           |
| Marine conservation zone assessment    | <ul style="list-style-type: none"> <li>Impacts on Margate and Long Sands Special Area of Conservation and Goodwin Sands Marine Conservation Zone.</li> </ul>                                                                                                                            | Appendix E, Section 25, Table 1.24                                           |
| Alternative solutions                  | <ul style="list-style-type: none"> <li>All development should be on brownfield sites or offshore.</li> <li>Request for National Grid to pause and review the Proposed Project.</li> <li>The Proposed Project should have been constructed at the same time as the Nemo Link.</li> </ul> | Appendix E, Section 25, Table 1.25<br><br>Appendix F, Section 18, Table 1.12 |
| Needs case                             | <ul style="list-style-type: none"> <li>No need for the Proposed Project in Suffolk or Kent.</li> <li>Power should be transported directly to the South East.</li> </ul>                                                                                                                 | Appendix E, Section 25, Table 1.27<br><br>Appendix F, Section 18, Table 1.14 |
| Coordination with other projects       | <ul style="list-style-type: none"> <li>Lack of coordination with other projects.</li> <li>Imperative that National Grid should coordinate with other developers to reduce adverse impacts of the Proposed Project.</li> </ul>                                                           | Appendix E, Section 25, Table 1.28                                           |

| Theme                             | Summary of feedback                                                                                                                                                                                                                                                                     | Location of regard had             |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Safety                            | <ul style="list-style-type: none"> <li>• Risk of fire during operation.</li> <li>• Vulnerability of infrastructure to hostile attack.</li> </ul>                                                                                                                                        | Appendix E, Section 25, Table 1.29 |
| Consultation                      | <ul style="list-style-type: none"> <li>• Concerns that the feedback has not been adequately addressed and the community has not been listened to.</li> <li>• Concerns over the ability of the local community to adequately respond to consultations from multiple projects.</li> </ul> | Appendix E, Section 25, Table 1.35 |
| Walking, cycling and horse-riders | <ul style="list-style-type: none"> <li>• Impact on public rights of way.</li> </ul>                                                                                                                                                                                                     | Appendix E, Section 25, Table 1.36 |
| Project finance/cost of scheme    | <ul style="list-style-type: none"> <li>• Concerns that decisions are based on the cheapest cost, rather than minimising the cost to wildlife and the environment.</li> <li>• Concerns that the Proposed Project is focused on making money for shareholders.</li> </ul>                 | Appendix E, Section 25, Table 1.40 |
| Timescales/ programme             | <ul style="list-style-type: none"> <li>• Construction on Sundays and Bank Holidays</li> </ul>                                                                                                                                                                                           | Appendix F, Section 18, Table 1.18 |
| DCO process                       | <ul style="list-style-type: none"> <li>• Pigging backing onto Friston consent for SPR – re word</li> </ul>                                                                                                                                                                              | Appendix F, Section 18, Table 1.22 |

- 10.5.6 The August 2024 guidance states that it may be appropriate for the applicant to group responses under headline issues. Therefore, Table 10.4 provides a summary of the feedback received during the Pre-submission engagement, grouped in themes, together with details of how National Grid has considered those responses in finalising its application for development consent in accordance with its duty under Section 49 of the Planning Act 2008.
- 10.5.7 The table shows which type of consultee raised a particular issue. Where the feedback has led to a design change this is noted in the last column of the table with a simple Y for yes and N for no.

Table 10.4 Summary of issues raised by respondents during Pre-submission engagement

| Ref.                 | Summary of issue                                                                                                                                                                        | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Design change |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Landscape and visual |                                                                                                                                                                                         |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| LV1                  | Concerns about the visual impact of National Grid's plan to move the Fromus Crossing closer to Hurts Hall having impacts on the Hall, the church of St John the Baptist and The Layers. |      | X    | X    | X      | <p>The landscape and visual impacts of the Proposed Project, including from the construction and operation of the Fromus Bridge, are assessed within <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment</b>. This sets out anticipated changes to key characteristics of published Landscape Character Areas at different project stages.</p> <p>The <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b> assesses the potential for impacts on the setting of heritage assets was discussed with key stakeholders including Suffolk County Council and Historic England and, as part of this procedure, a list of assets to fully assessed was agreed.</p> <p>A series of mitigation measures have been introduced to reduce the impact of the Fromus Bridge, which is not predicted to have any significant adverse heritage or landscape/ visual effects on Hurts Hall or St John's Church. . The construction activity would also not affect the historic connection between Hurts Hall and St John's Church, Saxmundham, with this connection being noted within the published Landscape Character Assessment.</p> | N             |

| Ref. | Summary of issue                                                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                                      |      |      |      |        | A Heritage Statement is submitted as <b>Appendix E of Application Document 7.1 Planning Statement</b> that assesses, in accordance with national policy and guidance, whether the Proposed Project would result in substantial harm to heritage assets and concludes that the Proposed Project would not result in substantial harm to any designated or non-designated assets.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| LV2  | Concerns regarding a lack of information about the impact of the Fromus Crossing and questions over the criteria for assessing the level of impact as significant.                   |      | X    |      | X      | <p><b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b> provides an assessment of the potential effects of the River Fromus bridge crossing on visual amenity.</p> <p>The assessment of potential impacts arising from the Suffolk Onshore Scheme, including those resulting from the Fromus Crossing, can be found within <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>. The assessment has been supported by information within the baseline report (<b>Application Document 6.2.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report</b>), as well as site visits and visualisations (<b>Application Document 6.4.2.1 Landscape and Visual and Application Document 6.4.2.3 Cultural Heritage</b>). A Heritage Statement of Harm is presented in <b>Application Document 7.1 Planning Statement</b>.</p> | N             |
| LV3  | Lack of meaningful designs of the new bridge including visualisations of further design drawings and photomontages to show the potential visual impact of the Fromus Crossing in the |      | X    |      |        | <p>Visualisations illustrating the River Fromus bridge crossing are provided within <b>Application Document 6.4.2.1 Landscape and Visual</b>, including representative viewpoints 2 and 20.</p> <p><b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b> provides an assessment of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N             |



| Ref. | Summary of issue                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | landscape, including the viewpoint to and from Hurts Hall.                                                                                                                                                               |      |      |      |        | <p>the potential effects of the River Fromus bridge crossing on visual amenity.</p> <p>Further information on likely cultural heritage effects arising from the Suffolk Onshore Scheme on the Grade II listed Hurts Hall (NHLE 1268178) and the non-designated parkland associated with Hurts Hall (including The Layers), is contained in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>.</p> <p>Details of the design of the River Fromus bridge are provided in the Design Approach Document and Design Principles should be referred to (<b>Application Document 7.11.1 Design Approach Document - Suffolk and Application Document 7.12.1 Design Principles – Suffolk</b>).</p>                                                                                                                                                |               |
| LV4  | Disagreement with National Grid's conclusion that the proposed changes would not seriously affect any key elements of the special architectural or historic interest of Hurts Hall or the Church of St John the Baptist. |      | X    |      | X      | <p>The assessment of potential impacts arising from the Suffolk Onshore Scheme, including those relating to the Grade II listed Hurts Hall (NHLE 1268178), the Grade II* listed St John the Baptists Church (NHLE 1268184) and the non-designated parkland associated with Hurts Hall (including The Layers), are contained in <b>Application Document 6.2.2.3 ES Part 2 Suffolk Chapter 3 Cultural Heritage</b>.</p> <p>Whilst noting the disagreement over the impacts of the new location of the crossing, the assessment that has been undertaken by National Grid is supported by information within the baseline report (<b>Application Document 6.2.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report</b>), as well as site visits and visualisations (<b>Application Document 6.4.2.1 Landscape and Visual and Application Document 6.4.2.3</b></p> | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                                                                                                                                                                              |      |      |      |        | <b>Cultural Heritage).</b> A Heritage Statement of Harm is presented in <b>Application Document 7.1 Planning Statement.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |               |
| LV5  | Request to include visuals of the Zone of Theoretical Visibility for views from Hurts Hall towards the Saxmundham Converter Station should be included in the ES.                                                                                                                                                            |      | X    |      |        | <p>As discussed above, the Converter Station has been sited and designed to minimise the impact on landscape character, whilst acknowledging that it is not possible to remove impacts entirely due to the scale and nature of the development. Following design and mitigation measures implemented to reduce the impact of the Converter Station at the Fromus Bridge, there are not predicted to be any significant adverse heritage or landscape/ visual effects on Hurts Hall or St John's Church as a result of the proposed development.</p> <p>The scope of the visualisations to support the assessment were agreed with stakeholders, including East Suffolk Council and Historic England.</p> <p>These are reproduced in <b>Application Document 6.4.2.1 Landscape and Visual and Application Document 6.4.2.3 Cultural Heritage.</b></p> | N             |
| LV6  | With regard to a statement by National Grid in the design amendments in Suffolk (this assessment notes that hedgerows have been lost in the parkland and identifies the reinstatement of hedgerows and replanting of parkland trees as a way to enhance the character of the area and the approach to the town', request for |      | X    |      |        | <p>The approach to Saxmundham from the south is noted in the Saxmundham Neighbourhood Plan (adopted July 2023) as being flanked by Hurts Hall Park to the east. As noted in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>, Hurts Hall was set within parkland, however, this is much degraded as a result of the removal of hedgerows changing the landscape from one dominated by small pasture fields to a landscape dominated by large open arable fields. Furthermore, a number of trees, typical of parkland planting, were also removed during the later 20th century.</p>                                                                                                                                                                                                                                    | N             |

| Ref.                       | Summary of issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                            | clarification on how the reinstatement of hedgerows east of the Fromus will enhance the approach to the town of Saxmundham.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |      |      |      |        | As a result, the hedgerow planting would assist in restoring a landscape previously of smaller fields and would assist in integrating the permanent infrastructure into the landscape, which National Grid considered to be an enhancement on the approach to the town of Saxmundham                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |               |
| <b>Terrestrial ecology</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| TE1                        | <p>Concerns over the replacement of BNG land adjacent to the River Stour with an area of agricultural land adjacent to the A256. Claims that the site lacks connectivity, ecological richness and the capacity to support the species that depend on Pegwell Bay. Furthermore that the proposals lack clarity on which bird species the mitigation is to benefit and the site presents several challenges that undermine its potential to function effectively as mitigation and compensation for the loss of functionally linked land at Minster Marshes.</p> <p>Concerns regarding noise and light pollution at the selected site.</p> |      | X    |      | X      | <p>The proposals adjacent to the A256 are not intended to meet any Biodiversity Net Gain requirement but are intended to specifically address the permanent loss of arable land functionally-linked to Thanet Coast and Sandwich Bay SPA/Ramsar. This habitat creation is intended to serve non-breeding golden plover and (to a lesser extent) breeding skylark.</p> <p>The proposals have been discussed with Natural England and consideration of noise and lighting impacts are included in <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity</b>. Non-breeding bird surveys are being undertaken and have identified the presence of golden plover around the site. Detailed habitat management prescriptions are presented in <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent</b>.</p> <p>Light pollution will be minimised during construction and operation as far as possible, whilst meeting National Grid specifications for lighting for safety, security and operational purposes. Measures to reduce light pollution from offshore and onshore development respectively are incorporated into Application Documents 7.5.2 and 7.5.3 Outline Construction Environmental Management Plans and their appendices. Requirement No, 6 of the Draft DCO requires the approval by the</p> | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                                                                          | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                      | Design change |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | <p>Concerns regarding whether adequate ecological baseline surveys have been conducted for this site.</p> <p>Suggestion to use a different site such as the agricultural lands on Back Sand Point located north of New Downs Farm towards Shell Ness at the mouth of the River Stour.</p>                                                                                                 |      |      |      |        | Host Authority of the detailed Construction Environmental Management Plans, including details of lighting.                                                                                                                                                                                                                                                                            |               |
| TE2  | <p>Positive feedback regarding the fact that National Grid is no longer considering the hoverport site as a construction compound but concerns regarding its use as an access route due to the impact on terrestrial ecology and the loss of protected flora and fauna such as the Sussex emerald moth.</p> <p>Requests for National Grid to explore and present alternative options.</p> |      | X    |      | X      | Since it is only to be used for operational monitoring and maintenance access no civil engineering highway works are planned; rather the existing track and hardstanding areas will be used. Therefore vegetated habitats along the track and elsewhere on the former hoverport should not be affected and National Grid does not accept that any further options should be explored. | N             |
| TE3  | Concerns over how National Grid intend to deliver Biodiversity Net Gain given that land identified at earlier stages of the Proposed Project has                                                                                                                                                                                                                                          |      | X    |      |        | National Grid are committed to the delivery of 10% BNG for the Proposed Project. However, it is considered that the delivery of habitat enhancement and creation measures within the Order Limits (i.e. surrounding converter stations, substation and access roads) on areas of land with no or limited public access within an                                                      | N             |

| Ref. | Summary of issue                                                                                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Design change |
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|      | been removed from the draft Order Limits.                                                                                                                                                           |      |      |      |        | <p>island of agricultural land would not deliver the best outcomes for nature conservation and deliver wider environmental and societal benefits.</p> <p>Therefore, the preferred route for BNG delivery is the work in partnership with third party landowners and relevant external organisations to deliver a more meaningful and targeted (i.e. to benefit protected and notable species within local biodiversity action plans) that may work towards any targets within the incoming Local Nature Recovery Strategy.</p> <p>This would be ongoing work post consent, with aims of developing a partnership with external organisation and third party landowners with the intention of funding landscape scale habitat restoration.</p> |               |
| TE4  | Concerns that a detailed tree survey and Arboricultural impact assessment is not available.                                                                                                         |      | X    |      |        | A detailed tree survey in accordance with BS5837:2012 has been undertaken and has been used to inform <b>Application Document 6.10 Arboricultural Impact Assessment</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |
| TE5  | Suggestion that any tree survey should be re-submitted according to the new version of BS5837 Trees in Relation to Design, Demolition and Construction which is currently scheduled for April 2025. |      | X    |      |        | <p>A new draft BS5837 was released for public consultation in August 2024. The consultation process closed in October 2024 and the draft document is no longer publicly available. A revised version is likely to be released in April 2025, and National Grid will review the need to update the tree survey when the new guidance has been published.</p> <p>The arboricultural survey and Arboricultural Impact Assessment have been based on the extant version of the British Standard and does not take into account the draft for consultation which is unavailable at the time of submission and will be subject to considerable change prior to its formal release. Once the final</p>                                               | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|      |                                                                                                                                                                                                                                            |      |      |      |        | revised BS5837 is released (currently planned for April 2005) the Proposed Project will consider the implications of the final updated guidance for the arboricultural impact assessment in line with any transitional periods for adoption.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| TE6  | Concern regarding how National Grid is intending to secure the habitat creation/restoration, management and monitoring measures that will be needed for Biodiversity Net Gain areas, and request for more information on what is proposed. |      | X    |      |        | <p>National Grid are committed to the delivery of 10% BNG for the Proposed Project. However, it is considered that the delivery of habitat enhancement and creation measures within the Order Limits (i.e. surrounding converter stations, substation and access roads) on areas of land with no, or limited public access within an island of agricultural land would not deliver the best outcomes for nature conservation and deliver wider environmental and societal benefits.</p> <p>While the Proposed Project application does seek compulsory powers for certain works, including planting and environmental mitigation, it does not seek powers of compulsory acquisition for land that would be used solely for Biodiversity Net Gain (although this is an approach that is used on other DCO projects).</p> <p>Therefore, the preferred route for BNG delivery is the work in partnership with third party landowners and relevant external organisations to deliver a more meaningful and targeted (i.e. to benefit protected and notable species within local biodiversity action plans) that may work towards any targets within the incoming Local Nature Recovery Strategy.</p> <p>This would be ongoing work post consent, with aims of developing a partnership with external organisation and third party landowners with the intention of funding landscape scale habitat restoration.</p> | N             |

| Ref.                     | Summary of issue                                                                                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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| TE7                      | Suggestion that the area set aside for Biodiversity Net Gain to the south of the A1094 should be retained for 30 years and not 10.                                                                                   |      | X    |      |        | The area south of the A1094 is not part of the Biodiversity Net Gain proposals for the Proposed Project and therefore does not need to be secured for 30 years.                                                                                                                                                                                                                                                                                                             | N             |
| TE8                      | Concerns that the easternmost construction compound on the western end of the cable route has good hedgerow and boxing it is would seriously impact its ability to deliver any worthwhile ecological function.       |      | X    |      |        | Impacts of this construction compound option are taken into account in <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity</b> . This option was only included in the event Nautilus came back to Saxmundham and is not the preferred option.                                                                                                                                                                                                 | N             |
| TE9                      | Request for information on where the skylark plots are proposed.                                                                                                                                                     |      | X    |      |        | This information is provided and the location for the skylark plots is identified in <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk</b> .                                                                                                                                                                                                                                                                                       | N             |
| <b>Water environment</b> |                                                                                                                                                                                                                      |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| WE1                      | Concerns that the River Fromus will become polluted with run-off if the Proposed Project goes ahead, and that flooding will become commonplace. Subsequently, the local ecology will be impacted including skylarks. |      | X    |      | X      | Detailed assessments of the Proposed Project's interactions with the River Fromus have been undertaken and are detailed in <b>Application Document 6.9 Water Framework Directive Assessment and Application Document 6.5 Flood Risk Assessment</b> . These assessments conclude that, with the embedded design and good practice measures that would be put in place, there would be no significant risks of pollution and no change to the flood flow regime of the river. | N             |
| WE2                      | Request for information regarding how the hoverport site                                                                                                                                                             |      | X    |      |        | The saltmarsh and mudflats would not be used to accommodate storage of construction materials. The access route proposed                                                                                                                                                                                                                                                                                                                                                    | N             |



| Ref.                         | Summary of issue                                                                                                                                                                                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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|                              | will be used for access including use of the mudflats and how the low tide line will be accessed.                                                                                                                                                            |      |      |      |        | would only be used for periodic operational monitoring and maintenance. No civil engineering highway works are planned; rather the existing track will be used and vegetated habitats along the track and elsewhere on the former hoverport site will not be affected.                                                                                                                                                                                                                                                                                                                                  |               |
| WE3                          | Statement that the use of the proposed compound at the Lord of the Manor roundabout should not deplete the quality of the underlying aquifer nor result in any spillages of liquids leading to impacts on surface water quality and downstream abstractions. |      | X    |      |        | The Project has secured a robust range of commitments to the establishment and running of construction compounds in order to prevent pollution of local surface and groundwater receptors. These are documented in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> which is secured through <b>Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order</b> .                                                                                                                                                                  | N             |
| <b>Traffic and transport</b> |                                                                                                                                                                                                                                                              |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |
| TT1                          | Criticism that the changes made to the road access proposals in Suffolk do not reduce the environmental impact because the site is the wrong location for an energy hub. Concerns that there is no easy access to the Saxmundham Converter Station site.     |      |      |      | X      | <p>2.1.2 The needs case for the Proposed Project has identified that a connection is required within the Sizewell area. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:</p> <ul style="list-style-type: none"> <li>• <b>Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022);</b></li> <li>• <b>Application Document 8.3 Strategic Options Report (October 2023);</b></li> </ul> | N             |

| Ref. | Summary of issue                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|      |                                                                                                                                             |      |      |      |        | <ul style="list-style-type: none"> <li><b>Application Document 7.2 Strategic Options Back Check Report;</b></li> </ul> <p>The rationale underlying the decision-making process that identified the Saxmundham Converter Station site as the preferred option emerged as a result of many respondents to the Non-statutory consultation expressing the view that all major energy projects currently proposed in East Suffolk should be coordinated, thus reducing the perceived spread of industrialisation and reducing impacts on the area.</p> <p>National Grid recognises the constraints of the access through Saxmundham which is why a new access south of Saxmundham is being proposed for the majority of construction traffic. The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>. The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place, including the routes through Saxmundham.</p> |               |
| TT2  | Request that the impact on local infrastructure including the highway network during construction and operation, has regard to the proposed | X    |      |      |        | <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> 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, with the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | N             |

| Ref. | Summary of issue                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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|      | adjustments to access and alterations to the size and location of potential construction and maintenance compounds.                                                                                                      |      |      |      |        | mitigation identified within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> . Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design team based on the anticipated construction programme and construction compounds/ activities at each access point. The assessment within <b>Application Document 6.2.2.7 Part 2 Chapter 7 Traffic and Transport</b> is based on the peak construction phase and the assumptions relating to trip generation and trip distribution are robust.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| TT3  | Request for the Order Limits to include space to accommodate measures to protect vulnerable road users (pedestrians, cyclists, mobility scooters and equestrians) using the same highway between Benhall and Saxmundham. |      | X    |      |        | <p><b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> sets out the management measures for the control of construction traffic. The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place, including for the B1121 Main Road between Benhall and Saxmundham. Therefore, it is not considered that any additional mitigation is required.</p> <p>Notwithstanding the above, there is insufficient land available within the public highway for an offline cycle track to be provided along the length of the B1121. CPO of land adjacent could not be justified by the traffic figures associated with this scheme. Community benefit funding is available should alternative routes for a cycle track should it be wished to be explored.</p> | N             |
| TT4  | Request to provide details of how the A1094 will be kept open                                                                                                                                                            |      | X    |      |        | <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> outlines localised                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Design change |
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|      | and clear during construction, and where haul roads, welfare and laydown compounds and parking will be situated.                                                                                                                                                                                                  |      |      |      |        | <p>traffic management measures, where Temporary Traffic Management measures will be required to accommodate the construction of each of the access points, which could entail temporary traffic lights or stop/go signage, lane closures and diversions, and restrictions to pedestrian access and car parking.</p> <p>In terms of the A1094, no improvements are now planned at the A1094/B1121 junction as only limited construction traffic is required to access existing overhead line assets. Localised widening is proposed at the A1094/ B1069 Snape Road junction to enable the movement of HGVs and cable drums AILs through this junction.</p> <p>Further details on temporary traffic management, haul roads, construction compounds and parking are set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>.</p> |               |
| TT5  | <p>Significant concerns over the use of Benhall Railway Bridge for access to the Saxmundham Converter Station site due structural capacity of the bridge being restricted to STGO 1, 46 tonnes.</p> <p>Suggestion to undertake effective engagement between all relevant parties regarding use of the bridge.</p> |      | X    |      |        | <p>National Grid is aware of the weight restriction recently placed on the road over rail bridge on the B1121. This could impact on the use of the bridge for AIL movements, albeit that National Grid is confident that its use will be practical. Further assessment of the bridge and or the installation of temporary works to facilitate the crossing of this structure will be undertaken at detailed design in consultation with the Local Council's structures team.</p>                                                                                                                                                                                                                                                                                                                                                                                                           | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                                                                        |      |      |      |        | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
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|      |                                                                                                                                                                                                                                                                                                                                                                                         | S42a | S42b | S42d | S47/48 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |
| TT6  | Request for information regarding the likely use of the newly proposed permanent access for the Proposed Project in Kent onto the Sandwich Bypass/A256 along with confirmation of suitable visibility splays and any necessary deceleration/acceleration tapers for egress and access onto the A256, as well as a Stage 1 Road Safety Audit (RSA) for any design changes to the access. |      | X    |      |        | <p>The Sandwich Road compound is proposed as an option to be used during construction, as well as if required for maintenance or repair purposes during the operational phase. Please refer to <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> which provides further information relating to the proposed construction compounds. The indicative locations of the construction compounds for the Kent Onshore Scheme are illustrated on <b>Application Document 2.14.2 General Arrangement Plans – Kent</b>.</p> <p>In terms of access onto the A256, the A256 junction has been designed to be fully compliant with DMRB. A Stage 1 RSA has been carried out and shared with KCC. A Designer's Response to the RSA Stage 1 has been produced outlining the changes made in response to the RSA's comments. The proposed design/ layout of the A256 access has been revised to consider any recommendations where necessary.</p> | N             |
| TT7  | Request that any changes to traffic routing should be explored within the transport assessment. Regarding the Sandwich construction compound, this would be the A256/A299 Lord of the Manor roundabout and A256/Sandwich Road roundabout.                                                                                                                                               |      | X    |      |        | <p>The Sandwich Road compound is proposed as an option to be used during construction, as well as if required for maintenance or repair purposes during the operational phase. A transport thematic meeting was held with Kent County Council, Thanet District Council and Dover District Council to provide a summary of this design change. <b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport</b> includes an assessment of construction traffic associated with the Proposed Project including construction vehicles associated with the access and compound on Sandwich Road. This Chapter concludes that no significant effects are expected on the highway network during the construction phase as a result of construction traffic.</p>                                                                                                                                                                                                               | N             |

| Ref.                             | Summary of issue                                                                                                                                                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
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| Intra-project cumulative effects |                                                                                                                                                                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| IP1                              | Concerns over the intra-project cumulative effect on Hurts Hall from noise, dust and light pollution during construction.                                                                                                         |      | X    | X    |        | <p>As discussed above, the Converter Station has been sited and designed to minimise the impact on landscape character, whilst acknowledging that it is not possible to remove impacts entirely due to the scale and nature of the development.</p> <p>Following design and mitigation measures implemented to reduce the impact of the Converter Station at the Fromus Bridge, there are not predicted to be any significant adverse heritage or landscape/ visual effects on Hurts Hall as a result of the proposed development.</p> <p>Further information is contained within <b>Application Document 6.2.2.12 Part 2 Chapter 12 Intra-Project Cumulative Effects</b>.</p> <p>Measures to reduce can control light pollution, noise and air quality impacts are incorporated into <b>Application Documents 7.5.2 and 7.5.3 Outline Construction Environmental Management Plans and their appendices</b>. This is considered to be a robust mechanism for controlling intra-project cumulative effect on Hurts Hall.</p> | N             |
| Cultural heritage                |                                                                                                                                                                                                                                   |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| CH1                              | Advice provided that all areas that have not previously been subject to archaeological assessment, followed by trench evaluation, should be undertaken at the earliest opportunity. This is particularly relevant for the area at |      | X    |      |        | <p>All areas within the DF4 Order Limits have been subject to archaeological assessment, with data collected from Suffolk Historic Environment Record.</p> <p>Currently works in the Hazlewood Common and Bloomfields Covert are limited to non-intrusive works associated with habitat creation which is not considered to require trial trenching.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N             |

| Ref.                  | Summary of issue                                                                                                                                                                                                                                                                      | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|                       | Hazlewood Common and Bloomfields covert.                                                                                                                                                                                                                                              |      |      |      |        | If this changes and intrusive works proposed, appropriate archaeological investigations will be undertaken. This is set out in <b>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| CH2                   | Concern that the movement of the construction compound adjacent to Sandwich Road to a location of the north side of the road has potentially moved it to an even higher area of archaeological sensitivity. Concern over the impact on a neolithic causewayed enclosure in this area. |      |      |      | X      | <p>Potential impacts on possible heritage assets resulting from the relocation of the construction compound are detailed in <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage</b>. This assessment is based on current knowledge, and it is acknowledged that the area was not subject to geophysical survey or evaluation trenching due to the area being added to the Kent Order Limits near the end of the assessment period.</p> <p>Archaeological works will be undertaken in the area once the full nature of the compound is determined. Areas of the field have been previously disturbed and as a result it may be possible to locate the compound in areas of previous disturbance.</p> <p>If not, evaluation work and mitigation will be undertaken in agreement with Kent County Council in line with <b>Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent</b>, which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>.</p> | N             |
| <b>Climate change</b> |                                                                                                                                                                                                                                                                                       |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| CC1                   | Criticism that a carbon footprint report has not been prepared.                                                                                                                                                                                                                       |      |      | X    | X      | <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b> presents the assessment of the likely significant effects of the Proposed Project on the climate and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |



| Ref.                                     | Summary of issue                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
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|                                          |                                                                                    |      |      |      |        | <p>climate change effects that effect the Proposed Project and surrounding environment (as described in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b>).</p> <p>The scope of this assessment covers the climate change effects of the Proposed Project during construction, operation, and decommissioning. The assessment consists of a lifecycle GHG impact assessment and a climate change resilience assessment, in accordance with the IEMA guidance for assessing climate change in EIAs (Institute of Environmental Management and Assessment, 2022; Institute of Environmental Management and Assessment, 2020).</p> <p>The assessment concludes that the climate change effects associated with the Proposed Project are deemed not significant.</p> |               |
| <b>Walking, cycling and horse-riders</b> |                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               |
| W1                                       | Request that the Sailor's Path, adjacent to the new mitigation area, is kept open. |      | X    |      |        | <p>The new mitigation area is situated to the south of the A1094 and will be managed as acid grassland for ten years.</p> <p>The Sailor's Path runs along the southern boundary of the new mitigation area and access will be retained throughout this period, so that this is kept open.</p> <p>The approach to mitigation land is not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in the preliminary environmental information provided previously.</p>                                                                                                                                                                                                                                                          | N             |
| W2                                       | Concern over the impact of DF4.7 – the new area proposed                           |      | X    |      |        | This part of the Order Limits remains unchanged from the previously published design. As set out within <b>Application</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N             |

| Ref. | Summary of issue                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|------|-------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | with the draft Order Limits – on PRow TE37. Request for details of how this area will be used.                                      |      |      |      |        | <p><b>Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>, Cottington Lane is to be used during construction for mobilisation and staff movements. It is therefore proposed to temporarily (and locally) divert PRow TE37 along the northern grass verge of Cottington Lane, with site fencing to be installed along the diverted route that will sit parallel to Cottington Lane before this connects back into the existing route to the west. This diversion is to be in place for the full construction phase of the project, to avoid any interactions between PRow users and construction vehicles. The existing route will be reinstated after construction.</p> <p>The proposed diversion will minimise/avoid any interactions with construction vehicles, where it is estimated that there could be up to ten HGV movements per day (five arrivals and five departures) along Cottington Lane. If there is any requirement for construction vehicles to cross PRow TE37 then site fencing and crossing gates will be installed to separate construction vehicles and PRow users, where priority is given to the PRow. When construction vehicles require crossing, these gates will close off the PRow briefly then reopen once crossing is complete.</p> |               |
| W3   | Concern over the impact on PRow TE37 of additional land at St Augustine's Cross. Request for details of how this area will be used. |      | X    |      |        | <p>This part of the Order Limits remains unchanged from the previously published design. As set out within <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>, Cottington Lane is to be used during construction for mobilisation and staff movements. It is therefore proposed to temporarily (and locally) divert PRow TE37 along the northern grass verge of Cottington Lane, with site fencing to be installed along the diverted route that will sit parallel to Cottington Lane before this connects back into the existing route to the west. This diversion is to be in place for the full construction phase of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |

| Ref. | Summary of issue                                                                                                                                                    | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                     |      |      |      |        | <p>project, to avoid any interactions between PRow users and construction vehicles. The existing route will be reinstated after construction.</p> <p>The proposed diversion will minimise/ avoid any interactions with construction vehicles, where it is estimated that there could be up to ten HGV movements per day (five arrivals and five departures) along Cottington Lane. If there is any requirement for construction vehicles to cross PRow TE37 then site fencing and crossing gates will be installed to separate construction vehicles and PRow users, where priority is given to the PRow. When construction vehicles require crossing, these gates will close off the PRow briefly then reopen once crossing is complete.</p>                                                                                                                                                      |               |
| W4   | Concern over the impact of DF4.10 – the additional area west of the A256 – on PRow EE42 and the Saxon Shore Way. Request for details of how this area will be used. |      | X    |      |        | <p>This part of the Order Limits remains unchanged from the previously published design. As set out within <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>, the following management and mitigation will apply to both PRow EE42 and Saxon Shore Way:</p> <ul style="list-style-type: none"> <li>The HVAC OHL route will interact with PRow EE42 (and Saxon Shore Way which shares the PRow) on the southern bank of the River Stour (2x locations). Safety scaffolding and netting will be installed for the installation and restringing of OHL conductors. This provision will remain in place for full construction phase of the project, allowing the PRow to remain open. A short-term closure (one to five days) will be required to install netting, which can be undertaken with stop/go boards and staff on site managing the public.</li> </ul> | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                  | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Design change |
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|      |                                                                                                                                                                                                                                                                                   |      |      |      |        | <ul style="list-style-type: none"> <li>A temporary bridge structure will span across River Stour interacting with PRow EE42 and Saxon Shore Way (1x location). Sufficient clearance will be provided between bridge soffit and PRow route with safety scaffolding and netting to be installed to ensure the route remains open and provides access for Environment Agency river maintenance. This provision will remain in place for full construction phase of the project. A short-term closure (one to five days) or local diversion (up to four weeks) will be required around the works (within Draft Order Limits) to install safety measures.</li> </ul> <p>HVAC OHL restringing will interact with PRow EE42 and Saxon Shore Way (1x location). Safety scaffolding and netting will be installed. This provision will remain in place for full construction phase of the project, allowing the PRow to remain open. A short-term closure (one to five days) will be required to install netting, which can be undertaken with stop/go boards and staff on site managing the public.</p> |               |
| W5   | <p>Concerns regarding the impact of DF4.10 on the PRow network. Request for clarification as to whether this area will connect to Whitehouse Drove, identified as within the Draft Order Limits, via Richborough Road.</p> <p>Public Footpath EE46 and Restricted Byway EE43A</p> |      | X    |      |        | <p>The area of land previously shown to the south of the existing overhead line (to provide additional foraging habitat for birds moving inland from Pegwell Bay) has been removed and replaced with another area of land immediately to the west of the A256 further south. Rather than to create habitat in the way previously proposed, the strategy will now be to adapt existing farming practices on these arable fields in a way that is beneficial to important bird species. This change follows ongoing discussion with and advice from key stakeholders including Natural England. This area of land will not connect to Whitehouse Drove (such as via Richborough Road) and is not</p>                                                                                                                                                                                                                                                                                                                                                                                              | N             |

| Ref. | Summary of issue                                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
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|      | connect across Richborough Road. Concerns raised regarding user safety.                                       |      |      |      |        | <p>expected to interact with or affect the PRoW network. The approach to mitigation land is not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously.</p> <p>Public Footpath EE46 and Restricted Byway EE43A will continue to cross Richborough Road. This part of the Order Limits remains unchanged from the previously published design, other than the removal of the area of land (see above) which was previously shown to be accessed from Richborough Road and Whitehouse Drove. The intended use of Whitehouse Drove also remains unchanged from the previously published design. This will be used to access the bridge location to enable the construction of the southern abutments, this will require laying track way and constructing water course crossings (culverts). Vegetation clearance and survey works would also be undertaken at this access. The flow of construction vehicles on these accesses have been limited with the number of HGVs to be &lt;10 per day at the peak of the works. LGVs are largely vans and 4x4 vehicles for staff movements and again have been limited to a maximum of 25 per day at the peak. The works required to be undertaken using these accesses has also been limited and is considered necessary to undertake the works. Further details are set out in the <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b>.</p> |               |
| W6   | Suggestion that National Grid should consult the Suffolk County Council Active Travel team for comment on the |      | X    |      |        | Notwithstanding the above, National Grid will continue to engage with relevant stakeholders including SCC Highways, PRoW Officers as necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N             |

| Ref.                                    | Summary of issue                                                                                                                                                                                                                                                                                                               | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                          | Design change |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                         | National Cycling Route 1 which goes along Richborough Road.                                                                                                                                                                                                                                                                    |      |      |      |        | <p>The proposals along Richborough Road remain largely unchanged from the previously published design, other than the removal of an area of mitigation land from the Order Limits which was previously shown to be accessed from Richborough Road and Whitehouse Drove.</p> <p>Further details are set out in the <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b>.</p> |               |
| <b>Coordination with other projects</b> |                                                                                                                                                                                                                                                                                                                                |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| CO1                                     | Criticism that the reintroduction of land to accommodate the LionLink project is not a coordination of project, but simply a “co-location” that significantly magnifies all the adverse impacts. Suggestion that further work is needed to improve the plans and reduce the impact on the local community and the environment. | X    | X    | X    |        | <p>2.1.3 National Grid has engaged with other project developers in the area, including LionLink, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. Details of this process are set out in <b>Application Document 7.10 Coordination Document</b>.</p>                                  | N             |
| CO2                                     | Concerns that the public have been mis-led by National Grid regarding its intentions to co-locate due to the fact that additional and has been added                                                                                                                                                                           |      |      | X    | X      | <p>The reintroduction of areas of land adjacent to the proposed Converter Station at Saxmundham is intended to provide more flexibility on where construction compounds can be located and reflects ongoing coordination discussions with National Grid Ventures. This was communicated as Pre-submission engagement.</p>                                                                                                 | N             |

| Ref.                | Summary of issue                                                                                                                                                                                                                            | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                       | Design change |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                     | at Saxmundham for use by NGV.                                                                                                                                                                                                               |      |      |      |        | <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure.</p> <p>Whilst National Grid continues to work with NGV to explore opportunities for co-location and coordination it is important to say that no part of the Proposed Project is included to deliver LionLink, which is a separate project.</p> |               |
| CO3                 | Suggestion that National Grid should attend Sizewell C's forums to understand communities' needs and concerns and work with them to mitigate the inevitable negative impacts resulting from multiple energy projects in a small rural area. |      | X    |      |        | <p>National Grid has been actively engaging with Sizewell C to understand opportunities for coordination and sharing of construction infrastructure.</p> <p>As part of the DCO submission National Grid has submitted <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b>, which includes more than 25 developments including Sizewell C Nuclear Power Station, East Anglia One North Offshore Windfarm, East Anglia Two Offshore Windfarm and LionLink.</p>               | N             |
| <b>Consultation</b> |                                                                                                                                                                                                                                             |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |
| C1                  | Provide a single map of all the projects in the area.                                                                                                                                                                                       |      |      |      | X      | <p>National Grid has endeavoured to show information on other projects where possible throughout the pre-application process. As part of the Statutory consultation, the Project Overview Document included a map which included the Draft Order Limits for the Proposed Project alongside committed and planned developments in Suffolk. These other developments included Sizewell C, East Anglia One North, East Anglia Two, LionLink</p>                                                                           | N             |



| Ref. | Summary of issue                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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|      |                                                                      |      |      |      |        | and Nautilus. The interactive map on the Proposed Project website, which was updated during the Pre-submission engagement period, included a number of layers showing the location of other infrastructure projects in Suffolk. National Grid did not include these developments on all of its plans as it would have made the plans more difficult to understand.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| C2   | Consultation has been conducted in breach of the Gunning Principles. |      |      |      | X      | <p>National Grid has consulted on its proposals several times during the pre-application phase. The details of the events and the materials shared with the public as part of these consultations are all available on the Proposed Project website.</p> <p>As the Proposed Project has developed, National Grid has shown how the different options have been narrowed down, with consultation documents showing how feedback received has helped to inform the proposals. Additionally, this Consultation Report sets out National Grid's consideration of the more than 3,800 pieces of consultation feedback received across the various rounds of pre-application public consultation.</p> <p>National Grid believes this work meets the standards required by the Planning Inspectorate and the Secretary of State, and that it meets the requirements of the Gunning Principles. The consultation strategy for the Proposed Project has been informed by engagement with the local planning authorities, and there are further stages in the DCO process which allow the planning authorities, the Planning Inspectorate, and others, to consider the adequacy of its consultation.</p> | N             |

| Ref. | Summary of issue                                                                                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| C3   | Query as to why individual letters have not been responded to.                                                                                               |      |      |      | X      | <p>Whilst it is not National Grid's policy to respond to consultation responses, it has sought to respond to all queries received about the Proposed Project via phone, email and letter. As part of this process, it carried out regular back checks to try and ensure that all forms of contact it received where questions were raised were followed up on.</p> <p>Detailed responses to the submissions made at this stage are included (see section 24 and 25 <b>Application Document 5.1.6 Appendix E Statutory consultation</b> and section 17 and 18 <b>Application Document 5.1.7 Appendix F Targeted consultation</b>) and have been provided throughout this report.</p>                                                                                                                                                                                                                                                                                                                                                            | N             |
| C4   | Criticism that the pre-submission engagement has been poorly publicised, was held over the Christmas holidays and inadequate time has been given to respond. |      | X    |      | X      | <p>As part of its Pre-submission engagement, National Grid wrote to select stakeholders to provide them with a further opportunity to give feedback on its proposals. Given the nature of the changes that National Grid was inviting views on, this engagement was targeted at specific stakeholders and was non-statutory in nature. Despite this, National Grid accepted feedback from all those who chose to submit responses between 22 November 2024 and 12 January 2025, irrespective of whether National Grid had specifically written to the respondents to invite further comments.</p> <p>The timing of the Pre-submission engagement period meant that there was a 51-day window within which feedback could be submitted. Despite the engagement period's non-statutory nature, it is worth noting that this is in excess of the 28 day period required for statutory consultations being held in accordance with the Planning Act 2008. Additionally, the timing of the Pre-submission engagement meant that there were more</p> | N             |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                                                                     | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Design change |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      |                                                                                                                                                                                                                                                                                                                                                                                      |      |      |      |        | than 28 days between the start of the engagement period and the Christmas holidays.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
| C5   | Concern that National Grid published material regarding the Proposed Project changes on its website in the Document Library, stated as 'Local Engagement and Project Update (November 2024)', but it did not undertake an additional consultation nor has a mechanism for feedback on the published documents been provided, which has led to confusion among members of the public. |      | X    |      |        | <p>The April 2024 'Guidance on the pre-application stage for Nationally Significant Infrastructure Projects' note sets out that for 'any material change to a part of the proposed application where the project as a whole is not fundamentally changed [...] a bespoke and targeted approach to further consultation can be adopted'.</p> <p>National Grid held a round of Targeted consultation in summer 2024 in line with these principles, followed by focussed Pre-submission engagement with stakeholders between November 2024 and January 2025. As this engagement was held on a non-statutory basis, it was not a formal consultation. However, National Grid invited and received feedback via the Proposed Project email address during this time, with this method of communicating feedback included on the letters sent to specific stakeholders as part of this engagement.</p> | N             |
| C6   | The changes to the Proposed Project have not been properly consulted on, i.e. with the general public in the communities that will be affected. Statements that National Grid has only consulted with a selected group of stakeholders.                                                                                                                                              |      | X    | X    | X      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N             |
| C7   | Concern that the Kent plans do not show the location of the Lord                                                                                                                                                                                                                                                                                                                     |      | X    |      |        | As part of the Pre-submission engagement, National Grid published an updated set of General Arrangement Plans that set out its proposals during this time. Sheet 3 (see section 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N             |

| Ref.              | Summary of issue                                                                                                                                                                 | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Design change |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                   | of the Manor construction compound.                                                                                                                                              |      |      |      |        | <b>Application Document 5.1.9 Appendix H Pre-Submission Engagement)</b> of the Kent section of these plans includes the location of the aforementioned construction compound.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| C8                | Concern that hard copies of materials relating to the design changes were not provided in the community.                                                                         |      | X    |      |        | In the letters National Grid sent to those it invited comments from as part of the Pre-submission engagement, it set out that paper copies of documents could be provided upon request, although no such requests were received.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |
| C9                | Criticism at the lack of meaningful engagement with other energy scheme promoters locally, to scope out the potential for sharing of opportunities to reduce cumulative impacts. |      | X    |      |        | <p>National Grid considered the cumulative effect of other projects when developing its plans for the Proposed Project, with more information available for Suffolk in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects</b>.</p> <p>National Grid has additionally considered the potential for coordination of its proposals with National Grid Ventures' proposals throughout the development of plans for the Proposed Project. Coordination with National Grid Ventures has been considered as part of every public consultation on the Proposed Project, with the Saxmundham Converter Station site having been identified partially because of its capacity to accommodate further converter stations, such as those that would be required for the National Grid Ventures projects.</p> | N             |
| <b>Mitigation</b> |                                                                                                                                                                                  |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |               |
| M1                | Concerns raised regarding the ability of National Grid to mitigate the environmental impacts of the Proposed Project given the inadequate restoration                            |      |      |      | X      | Following the identification of the potential environmental effects as identified within the Environmental Statement, consideration has been given to how those potential effects could be addressed. The mitigation hierarchy has been applied and is a stepped process that helps development projects address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N             |

| Ref. | Summary of issue                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Design change |
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|      | and mitigation effort that followed the construction of the Nemo Link. |      |      |      |        | <p>potentially adverse impacts on the environment. When developing the Proposed Project, the following steps have been considered:</p> <ul style="list-style-type: none"> <li>• avoidance;</li> <li>• minimisation;</li> <li>• rehabilitation/restoration; and</li> <li>• offsetting.</li> </ul> <p>Each topic chapter of the ES has identified proposed mitigation measures that are required to address potential significant adverse effects of the Proposed Project, following the mitigation hierarchy. Mitigation has been categorised as follows:</p> <p>Embedded Measures: are those that are intrinsic to and built into the design. They include the avoidance of potential receptors, such as designated sites, through sensitive routeing, siting and design.</p> <p>Control and Management Measures: These are good practice measures that are included within <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> and other control and management plans such as the use of road sweepers and the implementation of measures to control silt-laden runoff during construction.</p> <p>Additional Mitigation Measures: These are measures over and above embedded measures, for example anything that has been added to the design purely to mitigate an effect such as ecological mitigation land (for example the area of acid grassland in Suffolk).</p> |               |

| Ref. | Summary of issue                                                                                                                                                                                                                                                                                                                                                             | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
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|      |                                                                                                                                                                                                                                                                                                                                                                              |      |      |      |        | As consent for the Proposed Project will be sought through a DCO, all three categories of mitigation as described above will be the subject of a DCO requirement and will therefore be secured; this means there will be a legal requirement to implement them. In addition, as most potential effects will be mitigated through a combination of embedded measures and control and management measures, no assessment of likely significant effects has been undertaken prior to the application of these measures as this would result in substantial repetition within the document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
| M2   | <p>Comment that the area south of the River Stour used to be connected to the north, but this connection no longer exists. This area is a beautiful area for walkers, cyclists and nature lovers, but has no easy access. Suggestion that National Grid could install its bridge in a safe location and build a cycle/walking path, generating benefit to the community.</p> |      |      |      | X      | <p>The Proposed Project team greatly appreciate the insights of the local communities in how they can best mitigate any residual impacts on the environment and enhance the environment further than its baseline condition. The EIA process is responsible for establishing the baseline environmental condition of the Proposed Project area, which then determines the mitigation that National Grid must put in place. This is then discussed with the relevant statutory advisory services such as Natural England, Historic England and the Environment Agency. With regard to the feedback of the local community described in this report, this has been provided to and read by the environmental specialists who are responsible for determining the mitigation measures to be put in place and is actively being considered within the relevant Management Plans to be provided to the Main Works Contractors'.</p> <p>The mitigation measures that have been presented in the DCO application are contained in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> which is secured through Requirement 6</p> | N             |

| Ref.                             | Summary of issue                                                                                                                                                                                              | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Design change |
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|                                  |                                                                                                                                                                                                               |      |      |      |        | of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |               |
| M3                               | Suggestion that National Grid ensures its mitigation strategy takes cumulative impacts on ecology into consideration and works in tandem with other developments to avoid further strain in local ecosystems. |      |      |      | X      | <p>National Grid is coordinating with other developers of large scale infrastructure projects where possible, noting that other projects are outside the control of National Grid.</p> <p>National Grid has set out details of how it has coordinated with other projects as part of its DCO application. Further details are contained in <b>Application Document 7.10 Coordination Document.</b></p> <p>The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is considered in the ES within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects</b> and <b>Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.</b></p> | N             |
| <b>Construction – compound s</b> |                                                                                                                                                                                                               |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| CC1                              | Criticism over National Grid's proposal to reintroduce areas of land adjacent to the Saxmundham Converter Station for construction compounds due to environmental impacts and impacts on local residents.     |      | X    |      | X      | <p>National Grid has endeavoured to minimise potential impacts resulting from construction compounds through adoption of the mitigation hierarchy and through sensitive routeing and siting of infrastructure and temporary works. There would be no direct habitat loss of habitat from internationally, nationally or locally designated sites due to the Suffolk Onshore Scheme. Mitigation is listed in <b>Application Document 7.5.3.2 CEMP Appendix B</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N             |



| Ref. | Summary of issue                                                                                                                                                                                                                                           | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Design change |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|      | Claims that this is not for coordination but for co-location.                                                                                                                                                                                              |      |      |      |        | <b>Register of Environmental Actions and Commitments (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . There will also be creation of woodland, grassland and pond habitat around the Saxmundham Converter Station and Friston Substation (for the scenario where the substation is built as part of the Proposed Project).                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
| CC2  | Suggestion that the need for the reintroduction of land for construction compound at Saxmundham suggested that the original proposal was flawed and failed to take into account the full impacts of the Proposed Project on the community and environment. |      |      |      | X      | National Grid has endeavoured to minimise potential impacts resulting from construction compounds through adoption of the mitigation hierarchy and through sensitive routeing and siting of infrastructure and temporary works. There would be no direct habitat loss of habitat from internationally, nationally or locally designated sites due to the Suffolk Onshore Scheme. Mitigation is listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> . There will also be creation of woodland, grassland and pond habitat around the Saxmundham Converter Station and Friston Substation (for the scenario where the substation is built as part of the Proposed Project). | N             |
| CC3  | Criticism that the reintroduction of land for construction compound at Saxmundham will lead to NGV expanding the site at a later date for further projects.                                                                                                |      |      |      | X      | The reintroduction of areas of land adjacent to the proposed Converter Station at Saxmundham is intended to provide more flexibility on where construction compounds can be located and reflects ongoing coordination discussions with National Grid Ventures. This was communicated as Pre-submission engagement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N             |

| Ref.          | Summary of issue                                                                                                                                                                                                                                                                   | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Design change |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| CC4           | Statement that it is unclear how the added flexibility sought by National Grid in relation to provision of additional land for construction compound at Saxmundham will provide flexibility for other promoters.                                                                   |      | X    |      |        | <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure.</p> <p>Whilst National Grid continues to work with NGV to explore opportunities for co-location and coordination it is important to say that no part of the Proposed Project is included to deliver LionLink, which is a separate project.</p> <p>National Grid has ensured throughout the development of the Proposed Project that, where it is aware of other projects' requirements, it has developed the Proposed Project in a way to not preclude other projects from constructing their required infrastructure. National Grid continues to work with other projects to explore opportunities for co-location and coordination. Details are contained in <b>Application Document 7.10 coordination Document</b>.</p> | N             |
| <b>Design</b> |                                                                                                                                                                                                                                                                                    |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| D1            | Suggestion that National Grid should reconsider the location of the Saxmundham Converter Station as the converter station for the Nautilus project will not be sited as the Isle of Grain. It was suggested that siting the Proposed Project with this development would make more |      |      | X    | X      | <p>The location of Saxmundham Converter Station was decided following a full appraisal process that considered environmental and socioeconomic factors as well as technical and engineering design considerations. These are set out in <b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023)</b>.</p> <p>The choice of Saxmundham as an appropriate location for a Converter Station for the Proposed Project is not affected by the Nautilus project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N             |

| Ref.                        | Summary of issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Design change |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                             | economic and environmental sense.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |
| D2                          | Statement that the Design Review Panel's feedback regarding the design of the Saxmundham Converter Station is published before the submission of the DCO in the interests of transparency and accountability. This would allow affected host communities to understand the design approach to the development and how the design principles and masterplan of the site is being developed. It could also contribute to building public confidence in the project and safeguarding community wellbeing. |      | X    |      |        | Design Principles have been established with regard to the requirements of national policy and National Grid is maintaining ongoing dialogue with the Host Authorities with regard to design aspects of the Proposed Project. National Grid is seeking input from independent design review panels, as recommended by the Host Authorities. This will be an iterative process over the consenting, examination and delivery phases of the Proposed Project. The Design Principles for the Proposed Project will also reflect the principles set out in the National Infrastructure Commission's Design Group Project Level Design Principles. Details are contained in <b>Application Document 7.12.1 Design Principles – Suffolk</b> . | N             |
| <b>Project finance/cost</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |               |
| PF1                         | Criticism that a full project costing is not available to the public.                                                                                                                                                                                                                                                                                                                                                                                                                                  |      |      | X    | X      | National Grid undertakes an options appraisal as the method to compare options and differentiate between its relative costs and benefits. Please refer to 'Our Approach to Consenting' and 'Our approach to Options Appraisal' to find out more. This approach was applied to the Proposed Project, for more information about the evaluation and findings please refer to the following:                                                                                                                                                                                                                                                                                                                                               | N             |

| Ref.                       | Summary of issue                                                                                                                                                                                       | S42a | S42b | S42d | S47/48 | National Grid's response (including the regard had to the consultation feedback)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design change |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                            |                                                                                                                                                                                                        |      |      |      |        | <ul style="list-style-type: none"> <li>• Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022);</li> <li>• Application Document 8.3 Strategic Options Report (October 2023);</li> <li>• Application Document 7.2 Strategic Options Back Check Report;</li> <li>• Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;</li> <li>• Application Document 7.10 Coordination Document; and</li> <li>• Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.</li> </ul> |               |
| <b>Land rights and CPO</b> |                                                                                                                                                                                                        |      |      |      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |               |
| LR1                        | Request for suitable safeguards to be in place in the CEMP for the protection of rising mains and surface water sewers as a result of the construction of compound S10 near the landfall at Aldeburgh. | X    |      |      |        | <p>National Grid acknowledges this request and confirms that it is undertaking ongoing engagement with the relevant stakeholders regarding the protection of rising mains and surface water sewers.</p> <p>If required suitable measures can be incorporated into <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</b> which is secured by Requirement 6 of <b>Application Document 3.1 draft Development Consent Order</b>.</p>                                                                                                                       | N             |

## 10.6 Development of design in response to the feedback

- 10.6.1

In accordance with Section 49 of the Planning Act, this Chapter demonstrates how National Grid has had regard to the matters raised within the relevant responses submitted to the Pre-submission engagement and whether feedback has led to design changes.
- 10.6.2

Table 10.4 provides a themed summary of the responses received to National Grid’s Pre-submission engagement, and National Grid’s response to these responses, in accordance with Section 49 of the Planning Act 2008.

Table 10.5 Summary of principal matters raised during pre-submission engagement that did not result in a design change

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Landscape and visual                   | <p>For the pre-submission engagement exercise concerns were raised over the landscape and visual impacts of the Proposed Project. A detailed response is provided in Table 10.4 above.</p> <p><b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment</b> provides an assessment of the potential effects of the River Fromus bridge crossing on visual amenity.</p> <p>Details on landscape mitigation, including strengthening areas of existing planting to provide greater biodiversity and screening function around the River Fromus Bridge and reinstatement of the former smaller scale fields and parkland nature, is set out within <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk</b>. This Plan is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>. Further information on likely cultural heritage effects arising from the Suffolk Onshore Scheme, including those relating to the Grade II listed Hurts Hall (NHLE 1268178), the Grade II* listed St John the Baptists Church (NHLE 1268184) and the non-designated parkland associated with Hurts Hall (including The Layers), should be referred to within <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</b>.</p> <p><b>Application Document 7.1 Planning Statement</b> considers the landscape and visual impacts of the Proposed Project against the policy tests for NSIPs and concludes that the Proposed Project is in accordance with national planning policy.</p> <p>Given that is it not practical to deliver the Proposed Project without any residual adverse landscape and visual impacts, and that these impacts have been mitigated and are consistent with national policy, National Grid considered that no further changes</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| Terrestrial ecology                    | <p data-bbox="544 259 1449 327">to the Proposed Project were required to address comments on landscape and visual impacts.</p> <p data-bbox="544 371 1465 477">During the pre-submission engagement exercise, concerns were raised over the impacts of the Proposed Project on terrestrial ecology. A detailed response is provided in Table 10.4 above.</p> <p data-bbox="544 506 1465 938">Concerns were expressed over how National Grid intend to deliver Biodiversity Net Gain. The Proposed Project is predicted to result in a net loss for area habitat units for both Suffolk and Kent, a net gain in hedgerow units in Suffolk, a net loss in hedgerow units in Kent and net gain in watercourse units in Suffolk and a net loss in watercourse units in Kent. As demonstrated within the BNG assessment, the delivery of a 10% net gain for biodiversity has not been possible within either the Suffolk or Kent Onshore Schemes. The additional units required to achieve a 10% gain for both Suffolk and Kent and the full assessment are included within <b>Application Document 6.12 Biodiversity Net Gain Feasibility Report</b>.</p> <p data-bbox="544 967 1469 1655">National Grid are committed to the delivery of 10% Biodiversity Net Gain for the Proposed Project. However, it is considered that the delivery of habitat enhancement and creation measures within the Order Limits (i.e. surrounding converter stations, substation and access roads) on areas of land with no, or limited public access, within an island of agricultural land would not deliver the best outcomes for nature conservation and deliver wider environmental and societal benefits. The Proposed Project is also committed to achieving 10% Biodiversity Net Gain even though this is not a legal requirement at present. It is proposed that the Biodiversity Net Gain will be delivered both within the order limits and off-site through a variety of methods, including via partnership agreements and/or by commercial Biodiversity Net Gain providers as part of their commercial habitat banking package. The Biodiversity Net Gain delivery will be secured via a suitable legal mechanism and discussions are currently being undertaken with the local planning authorities and other relevant conservation bodies on-site by National Grid through its supply chain.</p> <p data-bbox="544 1684 1442 1751">Further details regarding Biodiversity Net Gain are contained in <b>Application Document 6.12 Biodiversity Net Gain</b>.</p> <p data-bbox="544 1780 1449 2029">As set out in the <b>Application Document 7.1 Planning Statement</b>, the Proposed Project is assessed to mitigate all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases.</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| Water environment                      | <p data-bbox="544 259 1469 474">National Grid therefore considers that no additional changes are required to the Proposed Project to further reduce and mitigate impacts on terrestrial ecology, which the <b>Application Document 7.1 Planning Statement</b> assesses as being in accordance with the policies of NPS EN-1 NPS EN-5 that relate to the protection of ecological sites and features.</p> <p data-bbox="544 517 1469 656">During the Pre-submission engagement exercise, concerns were raised over the impacts of the Proposed Project on the water environment. A detailed response is provided in Table 10.4 above.</p> <p data-bbox="544 685 1469 790">Concerns that the River Fromus will become polluted with run-off if the Proposed Project goes ahead, and that flooding will become commonplace.</p> <p data-bbox="544 819 1469 1106">A detailed assessments of the Proposed Project’s interactions with the River Fromus have been undertaken and are detailed in <b>Application Document 6.9 Water Framework Directive Assessment and Application Document 6.5 Flood Risk Assessment</b>. These assessments conclude that, with the embedded design and good practice measures that would be put in place, there would be no significant risks of pollution and no change to the flood flow regime of the river.</p> <p data-bbox="544 1135 1469 1491">Requests for information were made regarding how the hoverport site will be used for access including use of the mudflats and how the low tide line will be accessed. The saltmarsh and mudflats would not be used to accommodate storage of construction materials. The access route proposed would only be used for periodic operational monitoring and maintenance. No civil engineering highway works are planned; rather the existing track will be used and vegetated habitats along the track and elsewhere on the former hoverport site will not be affected.</p> <p data-bbox="544 1520 1469 1845"><b>Application Document 7.1 Planning Statement</b> confirms that the mitigation hierarchy has been followed, and there are no likely significant residual effects in relation to water environment receptors during all phases of the Proposed Project. National Grid has submitted a WFD assessment (see <b>Application Document 6.9 Water Framework Directive Assessment</b>) which confirms that the Proposed Project is not likely to cause deterioration of the WFD status of the waterbodies interacting with the Proposed Project.</p> <p data-bbox="544 1874 1469 2049">National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Pre-submission engagement . As such, it is considered that the Proposed Project is in accordance with both national and local policy with regard to impacts on the water environment and</p> |



| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Traffic and transport                  | <p>that no further changes are considered necessary to make the Proposed Project consistent with national policy in this regard.</p> <p>During the pre-submission engagement exercise concerns were raised over the traffic and transport impacts of the Proposed Project. A detailed response is provided in Table 10.4 above.</p> <p>These concerns included impacts on the local highway network and infrastructure. Given that it is impossible to deliver the Proposed Project without at least some disruption of the traffic and transport networks and that no significant adverse effects are anticipated as a result of the construction phase National Grid considers that the information submitted with the DCO application addresses and responds to the issues raised in the Pre-submission engagement, and that no further changes are considered necessary to make the Proposed Project consistent with national policy in regard to traffic and transport impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Inter-project cumulative effects       | <p>Concerns over the intra-project cumulative effects on Hurts Hall in Suffolk from noise, dust and light pollution during construction were expressed, a detailed response is provided in Table 10.4 above.</p> <p>During the construction phase, potential effects have only been identified on non-designated assets from two additional topics (Landscape and Visual and Noise and Vibration) , both of which identified negligible or minor effects, which are not expected to combine in such a way as to lead to a significant intra-project cumulative effect upon designated/non-designated heritage assets.</p> <p>During the operational and maintenance phase, potential effects have only been identified on designated and non-designated assets from two additional topics (Landscape and Visual and Noise and Vibration) , both of which identified negligible or minor effects, which are not expected to combine in such a way as to lead to a significant intra-project cumulative effect upon designated/non-designated heritage assets.</p> <p>National Grid has provided further information which is contained within <b>Application Document 6.2.2.12 Part 2 Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects</b> and considers that the measures included in this document provide an appropriate means of mitigating and controlling cumulative effects of a number of other projects.</p> <p><b>National Grid considers that no further changes are required for the Proposed Project in relation to Intra-project cumulative effects.</b></p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| Cultural heritage                      | <p data-bbox="544 264 1473 367">A number of comments were raised which raised issues relating to cultural heritage. A detailed response is provided in Table 10.4 above.</p> <p data-bbox="544 396 1461 649">Following the various rounds of consultation the Proposed Project has been designed, to follow as far as possible, the mitigation hierarchy for impacts on cultural heritage in order to 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.</p> <p data-bbox="544 674 1452 999">All areas within the Order Limits have been subject to archaeological assessment, with data collected from Suffolk Historic Environment Record. Currently works in the Hazlewood Common and Bloomfields Covert are limited to non-intrusive works associated with habitat creation, however, if this changes archaeological investigations will be undertaken. This is set out in <b>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk</b>.</p> <p data-bbox="544 1025 1461 1167">Potential impacts on possible heritage assets resulting from the relocation of the construction compound are detailed in <b>Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage</b>.</p> <p data-bbox="544 1193 1461 1485">Archaeological works will be undertaken in the area once the full nature of the compound is determined. Areas of the field have been previously disturbed and as a result it may be possible to locate the compound in areas of previous disturbance. If not, evaluation work and mitigation will be undertaken in agreement with Kent County Council in line with <b>Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent</b>.</p> <p data-bbox="544 1509 1473 1724">A Heritage Statement is submitted as Appendix E of <b>Application Document 7.1 Planning Statement</b> that assesses, in accordance with national policy and guidance, whether the Proposed Project would result in substantial harm to heritage assets and concludes that the Proposed Project would not result in substantial harm to any designated or non-designated assets.</p> <p data-bbox="544 1751 1449 2002">The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to two designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality.</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                                        | <p>In accordance with the NPS EN-1 paragraphs 5.9.32 and 5.9.33, and taking into account of the principles set out in NPS EN-1 paragraphs 4.2.16 and 4.2.17, the substantial public benefits and need for the Proposed Project, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the lower end of the spectrum, to the designated heritage assets and the non-designated heritage asset of schedulable quality. The less than substantial harm upon non designated heritage assets affected by the Suffolk Onshore Scheme is also clearly outweighed by the substantial public benefits and need for the Proposed Project providing the judgement required under paragraph 5.9.33 of NPS EN-1.</p> <p>As such National Grid did consider that any additional changes to the Proposed Project were required to make it consistent with national policy and regulations in relation to Cultural Heritage.</p>                                        |
| Climate change                         | <p>Concerns about the impacts on the Proposed Project from climate change were raised during the Pre-submission engagement. A detailed response is provided in Table 10.4 above</p> <p>A climate change risk assessment is included within <b>Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change</b>. This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in Environmental Impact Assessments.</p> <p>A separate, more detailed flood risk assessment has been conducted within <b>Application Document 6.8 Flood Risk Assessment</b>. The flood risk assessment involves detailed modelling and assessment, and accounts for the impacts of climate change on flooding.</p> <p>National Grid considers that the information submitted with the DCO addresses and responds to climate change issues and does not consider that any further changes are required to the Proposed Project.</p> |
| Walking, Cycling and horse-riders      | <p>During Pre-submission engagement, concerns were expressed over the impact of the Proposed Project on Walking, Cycling and horse-riders, a detailed response is provided in Table 10.4 above.</p> <p>National Grid has adhered, as far as possible, to the "mitigation hierarchy" by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                        | <p>disruption to footpaths during the construction phase. Where National Grid has a temporary impact on a PRow during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided.</p> <p>Impacts on footpaths are considered in <b>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b> and <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism</b>. Potential impacts on PRow and walking and cycling routes including the King Charles III England Coast Path are also considered within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport</b> and <b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport</b>.</p> <p><b>National Grid has submitted Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk and Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> which are considered to suitably mitigate the impacts of the Proposed Project on walking, cycling and horse-riders to the extent that no further changes to the Proposed Project are required.</p> |
| Coordination with other projects       | <p>Concerns were expressed during the Pre-submission engagement that there is a lack of coordination between the Proposed Project and other energy projects in the Suffolk area and that consequently, the cumulative impact is not being adequately assessed or mitigated. A detailed response is provided in Table 10.4 above.</p> <p>National Grid has engaged with other project developers, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities, see <b>Application Document 7.10 Coordination Document</b>. As such, National Grid does not consider any further changes are required to the Proposed Project to address these concerns.</p>                                                                                                                                                                                                                                                           |
| Mitigation                             | <p>Concerns were raised during the Pre-submission engagement regarding the ability of National Grid to mitigate the environmental impacts of the Proposed Project given the inadequate restoration and mitigation effort that followed the construction of the Nemo Link. A detailed response is provided in Table 10.4 above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                                        | <p>The Proposed Project has been through a robust EIA process to establish the baseline environmental condition of the Proposed Project area, which then determines the mitigation that National Grid must put in place.</p> <p>This has been discussed with the relevant statutory advisory services such as Natural England, Historic England and the Environment Agency before and during the various consultation exercises that National Grid has undertaken. With regard to the feedback of the local community described in this report, this has been reviewed by the environmental specialists who are responsible for determining the mitigation measures to be put in place, and has actively been considered in the production of the relevant outline Management Plans that are submitted with the DCO application and which will be provided to the Main Works Contractors'. Mitigation measures are listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>.</p> <p>National Grid is confident in the mitigation that is proposed is appropriate and that no further changes are required to the mitigation that has been included in the Proposed Project.</p>                                                                                                                                                                                                                                                                                                                                                                        |
| Construction Compound                  | <p>Concerns were raised regarding the environmental impacts of the construction compounds around the Saxmundham Converter Station. A detailed response is provided in Table 10.4 above.</p> <p>National Grid has endeavoured to minimise potential impacts resulting from construction compounds through adoption of the mitigation hierarchy and through sensitive routeing and siting of infrastructure and temporary works. There would be no direct habitat loss of habitat from internationally, nationally or locally designated sites due to the Suffolk Onshore Scheme. Mitigation is listed in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b>. There will also be creation of woodland, grassland and pond habitat around the Saxmundham Converter Station and Friston Substation (for the scenario where the substation is built as part of the Proposed Project).</p> <p>Criticism was also raised that the reintroduction of land for construction compounds will lead to NGV expanding the site at a later date for further projects. National Grid is actively engaging with NGV regarding opportunities for coordination and colocation with LionLink and the Proposed Project and NGV will provide an environmental impact assessment for their own projects.</p> <p>National Grid is confident that the construction compound that is proposed and that its strategy for co-ordination in relation to the</p> |

| Issue raised in Statutory consultation | Reason why the issue did not result in a design change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Design                                 | <p>construction compounds at the Saxmundham Converter Station site are appropriate and that no further changes are required to the mitigation that has been included in the Proposed Project.</p> <p>Concerns were raised regarding the environmental impacts of the design of the project. A detailed response is provided in Table 10.4 above.</p> <p>National Grid has submitted a full suite of environmental information, including <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> to explain the factors that have informed the design and does not consider that any further changes are required to the design of the Proposed Project to address these concerns</p>                                                                                                                 |
| Project finance/cost of scheme         | <p>Criticism was made regarding the lack of a full project costing is not available to the public. A detailed response is provided in Table 10.4 above.</p> <p>National Grid has undertaken an options appraisal as the method to compare options and differentiate between its relative costs and benefits. The capital costs and lifetime costs summaries for the Proposed Project are provided in <b>Application Document 7.2 Strategic Options Back Check Report</b>. Information concerning the land and rights acquisition costs are detailed in <b>Application Document 4.1 Funding Statement</b>.</p> <p>As such, National Grid does not consider that any further changes to the Proposed Project to address this feedback is necessary.</p>                                                                                               |
| Land Rights and CPO                    | <p>Concerns were expressed over the impact on landowners and the need to provide compensation. A detailed response is provided in Table 10.4 above.</p> <p>National Grid acknowledges that the Proposed Project may cause concern to landowners. Engagement with landowners has continued on the Proposed Project since before non-statutory consultation as is set out in the <b>Application Document 4.2 Statement of Reasons</b> and a number of design changes have resulted from such engagement as set out in Table 8.5 above. However, it is not possible to introduce a change to the Proposed Project that will remove all potential impacts on landowners and National Grid will continue to pursue voluntary agreements with affected landowners. As such does not consider that any changes (further to this approach are required.</p> |



## 10.7 Evolution of the Proposed Project in Response to Pre-Submission Engagement

- 10.7.1 None of the feedback received during the Pre-submission engagement led to a change in the design of the Proposed Project. As discussed in paragraph 10.5.4 in this Consultation Report, a significant amount of the feedback received during Pre-submission engagement was not directly related to the scheme changes consulted on, i.e. much of the feedback was the same as that received during either the Statutory or the Targeted consultation, and National Grid received many general points of concern regarding the potential adverse environmental and social impacts of the Proposed Project.

### Discussions with Suffolk host authorities regarding ‘application readiness’

- 10.7.2 There have been a series of discussions with Suffolk County Council and East Suffolk District Council in the weeks running up to the DCO application regarding the readiness of the Sea Link project for submission. These discussions have occurred as part of National Grid’s ongoing dialogue with planning officers and elected members at the host local authorities. However, this specific area of discussion was initiated by correspondence received from elected members of SCC and ESDC in early February 2024.
- 10.7.3 In the correspondence, ESDC stated that they objected to the Sea Link proposals, and that they were dissatisfied with how NGET had addressed issues that had been raised and discussed as part of previous consultation and engagement. ESDC did nonetheless acknowledge that it considered that some limited progress had been made, and that it remained committed to working constructively with NGET. The correspondence requested that NGET further address certain issues pre-submission, signposting to previous engagement topics including the approach to coordinating with other projects; construction working hours; points of clarification on Friston Substation; the Suffolk converter station access; and various matters of EIA methodology. The correspondence stated that ESC considered that limited information had been shared for comment.
- 10.7.4 The correspondence from SCC similarly stated that they were concerned about NGET’s approach to certain matters that had been raised and discussed as part of previous consultation and engagement. The matters comprised the outcome of a recent survey on the structural capacity of the Benhall Bridge (an SCC highways asset on the proposed Sea Link abnormal indivisible load (‘AIL’) route); the selection of the converter station access; construction working hours; and the timing of the draft Statement of Common Ground.
- 10.7.5 Since early February 2025, as part of this dialogue with the elected members and officers, National Grid has issued detailed responses to both SCC and ESC which directly address the matters raised, and provide reassurances regarding National Grid’s approach, the extent of the discussion and engagement on the matters raised, and the progress being made. Similarly, National Grid has met separately with elected members and planning officers to discuss all matters raised, and there have been a number of further technical meetings with officers to provide additional clarity on matters including the selection of the converter station access, and the likely methodology for taking AILs across weight-restricted SCC highways assets (the Benhall Bridge).



- 10.7.6 Notwithstanding this ongoing engagement, further subsequent correspondence from elected members at SCC reiterated concerns regarding matters including the Benhall Bridge, and sought further technical details. This correspondence expressed dissatisfaction about the level of engagement with SCC, particularly on highways matters. It further expressed the view that due to the perceived lack of clarity on the methodology for taking abnormal indivisible loads across the Benhall Bridge, the Sea Link application was not ready for submission. A further response was provided by National Grid to SCC, addressing the points raised.
- 10.7.7 National Grid recognises that there may be a degree of opposition to the Sea Link project from the host authorities, either at the political or officer levels. National Grid also recognises that there are certain elements of the proposed development (for example the approach to accessing the Suffolk converter station via the B1121, and construction working hours) on which the host authorities are not in agreement with National Grid. However, these (and indeed all) elements of the project have been included following consultation and detailed review and consideration of feedback received to that consultation. In the case of the construction working hours, these reflect those approved in the recently made National Grid (Bramford to Twinstead Reinforcement) Order (2024), also in Suffolk.
- 10.7.8 Regarding the Benhall Bridge, National Grid is aware that currently this off-site highways asset would require some temporary strengthening to facilitate AIL crossings. However, and as discussed with SCC, there are various standard measures available to facilitate this. This may involve the installation of a temporary overbridge to avoid any weight restrictions being exceeded. The specific methodology would depend on details available at later stages, including the AIL types, their weights, what vehicles would be used, how these affect the highways asset, and the condition of the highways asset at the time. As with all large energy projects, Sea Link will work with heavy lift and AIL engineering contractors during the detailed design and construction phase. These specialist engineers routinely work with developers and highways departments during construction projects to develop the detailed methodologies needed to successfully deliver AILs to sites. The likelihood of using this approach on Sea Link, subject to the outcome of future discussions with SCC including as part of agreeing the detailed Construction Traffic Management Plan, does not represent an impediment to the project, nor require a delay to the application submission.
- 10.7.9 National Grid is confident that substantial and robust consultation and engagement has occurred on Sea Link with all prescribed consultees and the wider community, notwithstanding certain residual areas of disagreement with the host authorities.

# 11. Conclusions

## 11.1 Compliance with the Planning Act 2008 and the Environmental Impact Assessment (EIA) Regulations

- 11.1.1 This Consultation Report has been submitted in accordance with Section 37(3)(c) of the Planning Act 2008 which requires that any application for an order granting development consent must be accompanied by a consultation report.
- 11.1.2 In accordance with the requirements of Section 37(7) of the Planning Act 2008, it has provided details of:
- consultation was undertaken in accordance with Section 46 of the Planning Act 2008, notifying the SoS of the proposed application as set out in Chapters 7 and 9 of this Consultation Report;
  - consultation was undertaken in accordance with Section 47 of the Planning Act 2008, as identified in Chapter 6 of this Consultation Report. This included consultation on the SoCC with local authorities, publication of the SoCC notice, making the SoCC available for inspection and undertaking consultation as set out in the SoCC;
  - how National Grid has carried out consultation in compliance with statutory requirements, namely Sections 42, 47 and 48 of the Planning Act 2008, in relation to the 2023 Statutory consultation, 2024 Targeted consultation and 2024/25 Pre-submission engagement;
  - a summary of the relevant responses received by National Grid in response to these consultations; and
  - how National Grid had regard to those relevant responses, in accordance with Section 49 of the Planning Act 2008.
- 11.1.3 In addition, this Consultation Report has provided an overview of how National Grid has carried out non-statutory consultation and engagement with stakeholders, and how the feedback received through such activities has also been taken into account by National Grid in developing the Proposed Project design and assessing its effects on the environment.
- 11.1.4 In this Consultation Report, National Grid has demonstrated that a staged and iterative approach to consultation has been undertaken in relation to the Proposed Project, reflecting pre-application guidance on consultation, other than those areas where the Proposed Project is too mature to comply with Nationally Significant Infrastructure Projects: Advice on the Consultation Report (August 2024) as set out in Section 9.X. This approach has been taken to provide the opportunity for consultees to help influence the developing proposals.
- 11.1.5 It is therefore concluded that, as evidenced in this Consultation Report and **Application Document 5.1.1 Annex 1 Consultation Compliance Checklist**, National Grid has complied with all statutory requirements of the Planning Act 2008 in relation to carrying out pre-application consultation.

- 11.1.6 The EIA Regulations 2017 also include a requirement to prepare and consult on preliminary environmental information. A Preliminary Environmental Information Report was therefore produced at Statutory consultation (undertaken between 24 October and 18 December 2023) and for Targeted consultation (undertaken between 08 July to 11 August 2024) a new Preliminary Environmental Information Report was provided based on the changes made to the Proposed Project.
- 11.1.7 The Statutory and Targeted consultations were publicised in accordance with Section 48 of the Planning Act 2008 as identified in Chapter 7 and 9 of this Consultation Report. This also included notification to consultation bodies in line with the EIA Regulations 2017.

## 11.2 Summary of Changes Made

- 11.2.1 National Grid has adopted a multi-phased consultation approach, comprising of Non-statutory consultation, Statutory consultation, Targeted consultation and Pre-submission engagement. This approach has sought consultation feedback on all aspects of the Proposed Project throughout its development, enabling feedback to influence the design evolution.
- 11.2.2 Over the course of the aforementioned consultation periods, National Grid has made changes to the Proposed Project through a combination of feedback received from stakeholders and engineering and environmental assessment. Changes made include the following:
- realignment of the HVDC route near Leiston Road in Suffolk, moving it further away from the road. This change moves construction activity further away from nearby residential properties and is in responses received from property owners;
  - selection of a modified version of the western construction and maintenance access route for the Saxmundham Converter Station;
  - increase in the height of the bridge over the River Fromus in Suffolk to take account of feedback received from the Environment Agency regarding compliance with the Water Framework Directive;
  - change in the alignment of the bridge over the River Fromus in Suffolk to avoid valuable trees in response to feedback received;
  - refinement of the size and location of construction compounds in Suffolk and Kent due to feedback received relating to land issues and environmental constraints;
  - an increase in the Order Limits in Suffolk and Kent to allow for further environmental mitigation and enhancement following feedback received including for golden plover and skylark;
  - inclusion of a new site for temporary mitigation and enhancement in Suffolk based on feedback received;
  - realignment of the offshore cable to avoid areas of aggregate extraction, Goodwin Sands marine protection area, migrating sands and the Harwich deep water channel and SUNK pilot station in response to feedback received;
  - selection of the full-height pylons for the Kent Onshore Scheme resulting in fewer pylons in total; and

- relocation of the construction compound planned for the hoverport site in Kent due to feedback received regarding biodiversity.

## 11.3 Stakeholder Engagement and Statements of Common Ground

- 11.3.1 In addition to the Non-statutory, Statutory, Targeted consultation and Pre-submission engagement, National Grid has undertaken ongoing stakeholder engagement through the development of the Proposed Project.
- 11.3.2 National Grid also developed a 'Host Authority Engagement Plan'. The first iteration of the Plan was circulated by the Proposed Project team to the host authorities on 29 June 2023, with further iterations issued as the Proposed Project has progressed, reflecting changes to the timetable. The objective was to:
- provide host authorities with a look ahead to when key planning and EIA activities were programmed to take place;
  - set out an overarching protocol for engaging with host authorities on planning and EIA matters;
  - assist the host authorities with resource planning for the Proposed Project; and
  - assist all parties in agreeing a Planning Performance Agreement (PPA).
- 11.3.3 A SoCG is a written statement jointly produced by National Grid and another party to assist in examining the DCO application by providing an overview of the status of discussions and negotiations between National Grid and the other party (or parties).
- 11.3.4 Where possible National Grid is endeavouring to make early progress in preparing SoCGs with stakeholders, such that agreed SoCGs can be submitted in a timely manner to the examination process to assist the Examining Authority in understanding which matters have been agreed and which remain unresolved. A list of draft SoCGs is contained in paragraph 3.4.23 of this Consultation Report.
- 11.3.5 Ongoing engagement with PILs and other stakeholders has been sought throughout the duration of the Proposed Project. It has facilitated two-way communication which has served to better inform individuals on the rationale behind the proposals, as well as shape them.
- 11.3.6 National Grid will continue to engage with existing PILs and also identify any new and additional interest within referencing limits throughout and after conclusion of Section 42 consultation but before the Application is submitted. National Grid will provide a proportionate opportunity to any new person identified with a land interest to make their views known on the Application. Where new interests in land are identified very shortly before the intended submission of the Application, despite diligent efforts earlier in the process, National Grid will be proactive and helpful in ensuring that the person understands how they can, if they so wish, engage with the process if the Application is accepted for examination.

## 12. References

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