

# Sea Link

## Volume 7: Other Documents

Document 7.4.5 Draft Statement of Common Ground Between National Grid Electricity Transmission and Thanet District Council.

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# 1. Introduction

## 1.1 Overview

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application process for a Development Consent Order (DCO) and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.2 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.
- 1.1.3 This SoCG is between National Grid Electricity Transmission Ltd (National Grid) and Thanet District Council (TDC) relating to the DCO application for the Sea Link Project (the Proposed Project). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).

## 1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and TDC. The SoCG will evolve as the DCO application progresses through Examination.
- 1.2.2 For the purpose of this SoCG, National Grid and TDC will jointly be referred to as the “Parties”. When referencing TDC alone, they will be referred to as “the Consultee”.
- 1.2.3 This early draft SoCG has been prepared by National Grid to submit with the DCO application, based on engagement with TDC throughout development of the Proposed Project. This document is draft and was sent to TDC in advance of inclusion in the DCO application, but no comments had been received when this document was finalised. National Grid will continue to work with TDC to resolve issues as the project progresses through the Pre-Examination and Examination phases and will record those agreements in later versions of the SoCG.

## 1.3 Role of Thanet District Council in the DCO Process.

- 1.3.1 TDC is a local authority for the purposes of section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the project is within its local authority area. Pursuant to Section 42 of the Planning Act 2008, National Grid must consult local authorities if the project is in a local authority’s area.
- 1.3.2 The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of TDC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:

- Providing the local perspective at the pre-application stage, in addition to any views expressed directly to the developer by residents, groups and businesses.
- Preparing written representations, SoCGs and Local Impact Reports ready for examination.
- Attending and participating in hearings and/or accompanied site visits.
- Discharging many of the requirements associated with a DCO if consent is granted.
- Monitoring and enforcing many of the DCO provisions and requirements.

## 1.4 Description of the Proposed Project

- 1.4.1 The Proposed Project is a proposal by National Grid to reinforce the transmission network in the Southeast and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.4.2 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.
- 1.4.3 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.
- 1.4.4 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:
- 1.4.5 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
- 1.4.6 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’.
- 1.4.7 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 high voltage direct current (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.
- 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 off the A256), up to 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.
- 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.

1.4.8 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.

## 1.5 Format of Document and Terminology

- 1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.5.2 Section 3 of this SoCG summarises the issues that are ‘agreed’, ‘not agreed’ or are ‘under discussion’. ‘Not agreed’ indicates a final position where the Parties have agreed

to disagree, whilst 'Agreed' indicates where the issue has been resolved. Where parts have been greyed out, this means the Consultee is not responsible for that matter or was not involved in discussions on that matter.

1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

**Table 1.1 Abbreviations**

<b>Abbreviation/Term</b>	<b>Definition</b>
BMV	Best Most Valuable Land
BTNO	Bramford to Twinstead Reinforcement Project
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
CIRIA	Construction Industry Research and Information Association
CNP	Critical National Priority
CRTN	Calculation of Road Traffic Noise
DCO	Development Consent Order
DDC	Dover District Council
DMRB	Design Manual for Roads and Bridges
EIA	Environmental Impact Assessment
EH	Environmental Health
ES	Environmental Statement
FEED	Front-End Engineering Design
FRA	Flood Risk Assessment
FRAP	Flood Risk Activity Permit
GLVIA	Guidelines on Landscape and Visual Impact Assessment
HDD	Horizontal Direct Drilling
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
KCC	Kent County Council
LCA	Landscape Character Area
LDC	Land Drainage Consent
LEMP	Landscape and Ecology Management Plan



<b>Abbreviation/Term</b>	<b>Definition</b>
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
NE	Natural England
NPS	National Policy Statement
OHL	Overhead Line
PCZ	Preliminary Consultation Zones
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Right of Way
PRoW MP	Public Rights of Way Management Plan
REAC	Register of Environmental Actions and Commitments
RSA	Road Safety Audit
SCZ	Secondary Consultation Zones
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
SuDS	Sustainable Drainage Systems
TDC	Thanet District Council
VP	Viewpoint

## 2. Record of Engagement

### 2.1 Summary of pre-application discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the DCO application.

**Table 2.1 Pre-application discussions**

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
10 November 2021	Thanet District Council (TDC), Dover District Council (DDC) & Kent County Council (KCC) Meeting	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy
19 May 2022	TDC and National Grid – Project Briefing	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy
09 June 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, feedback on draft non-statutory consultation strategy, emerging preference update
11 July 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation strategy
11 August 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation, EIA scoping, survey access, ground investigation
08 September 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation, ground investigation locations
13 October 2022	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, non-statutory consultation, survey access, ground investigation locations
14 December 2022	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, non-statutory consultation, ground investigation
14 February 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, ground investigation works, approach to coordination (in accordance with Planning Inspectorate (PINS) guidance), non-statutory consultation, site visits

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
14 March 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, planning performance agreement (PPA) and host authority engagement plan
18 April 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic meetings, PPA and host authority engagement plan
27 April 2023	TDC, DDC, KCC and National Grid Noise and Vibration Meeting	Discussion relating to the noise and vibration assessment methodology, and baseline noise surveys.
10 May 2023	TDC, DDC and National Grid Meeting – Landscape and Visual	Project update and timeline, viewpoints, study area and photomontages, landscape mitigation strategy and questions/AOB
13 June 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, landscape design, thematic meetings, PPA and host authority engagement plan, statement of community consultation
11 July 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, ground investigation programme, site notices
08 August 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, site notices, statement of community consultation (SoCC) feedback
12 September 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress SoCC feedback
16 October 2023	TDC, DDC, KCC and National Grid – Health and Wellbeing	Consultation relating to the PEIR – covered a high-level project overview, scope, methodology, baseline sources, sensitive receptors.
18 December 2023	TDC Statutory Consultation Response Letter	Consultation response which set out the main concerns TDC had in respect of the Proposed Project. The main concerns were the visual impact on the Landscape Character Area from the converter station, substation and pylons, the design of the converter station and associated structures, impact on Public Rights of Way (PRoWs), scale of loss of Best Most Valuable (BMV) Land, impact on protected and notable species at a local level, harm to archaeology and heritage, impact on local highway network and impact on local infrastructure.

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
12 January 2024	TDC and National Grid - Noise and Vibration	Engagement relating to the PEIR outcomes for noise and vibration and next steps.
15 January 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, statutory consultation, thematic meetings, PPA progress
05 February 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, statutory consultation, terrestrial ecology thematic meeting, PPA progress
06 February 2024	TDC, DDC, KCC and National Grid Meeting – Water Environment	Project update and timeline, engagement to date, FRA approach, converter station flood risk note update
07 February 2024	TDC, DDC, KCC and National Grid Meeting – Air Quality	Project update and timeline, air quality assessment methodology and statutory consultation feedback responses.
13 February 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic meetings, PPA progress, statements of common ground (SoCG)
14 February 2024	National Grid, KCC and TDC, DDC– Geology and Hydrogeology Thematic Meeting.	Project update and timelines, statutory consultation overview, geology and hydrogeology updates, thematic meetings, AOB.
19 February 2024	TDC, DDC, KCC and National Grid Meeting – Socioeconomics, Recreation and Tourism	Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.
20 February 2024	KCC, DDC, TDC and National Grid Meeting – Landscape and Visual	Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB
February 2024	TDC and National Grid – Ecology	The Kent Vantage Point Survey and collision risk assessment was shared with TDC for information only by National Grid,

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
	<i>Information Shared</i>	
<i>04 March 2024</i>	<i>KCC, DDC, TDC and National Grid Meeting – Health and Wellbeing</i>	<i>Project update and timeline, health and wellbeing update and timeline, statutory consultation feedback (PRoW and construction traffic feedback), discussion, next steps and AOB</i>
<i>12 March 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making, community benefit</i>
<i>02 April 2024</i>	<i>TDC, DDC, EA and National Grid Meeting – Water Environment</i>	<i>Review of actions from last thematic meeting, groundwater monitoring and flood risk assessment at Kent converter station site, drainage design updates, construction phase dewatering and permitting requirements</i>
<i>16 April 2024</i>	<i>TDC, DDC, KCC, National Grid and SE England Coast Path National Trail Officer Meeting – Landscape and Visual</i>	<i>Project update and timeline, discussion relating to aspects of the LVIA, Approach to outline landscape and ecology management plan, Mitigation Design Concepts and questions/AOB</i>
<i>16 April 2024</i>	<i>KCC, TDC, DDC and National Grid Transport Meeting</i>	<i>Transport meeting to provide a project update, review stat. con. and PEIR feedback and the transport deliverables including the Outline PRoW MP</i>
<i>17 April 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making</i>
<i>April 2024</i>	<i>TDC and National Grid - Ecology Information Shared</i>	<i>The First Season (2022-2023) Breeding and Wintering bird reports for Kent was shared with TDC for information by National Grid,</i>
<i>02 May 2024</i>	<i>KCC, TDC, DDC and National Grid – Transport (PRoW) Thematic Meeting</i>	<i>Outline PRoW Management Plan Discussion, PRoW Feedback/Considerations, AOB</i>



<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
14 May 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making
28 May 2024	TDC, DDC, KCC and National Grid meeting – Landscape and Visual	Project updates and timeline, discussion in relation to aspects of the LVIA, approach to outline Landscape and Environmental Management Plan (LEMP), mitigation design concepts, AOB and questions.
28 May 2024	TDC, DDC, KCC, EA and National Grid Meeting – Hydrology/flood risk	Previous meeting actions, update on general survey progress, details on ecological mitigation land area (plover), additional consents and licences to DCO, drainage updates, works within River Stour floodplain/riparian zone and AOB.
May 2024	TDC and National Grid – Ecology Information Shared	A preliminary noise assessment (contour maps only) for Kent, but not part of the DCO Documentation, were shared with TDC for information only by National Grid.
04 June 2024	TDC and National Grid – Landscape and Visual Information Shared	The Sea Link Provisional Growth Rates, the Kent Indicative Species Mix and the outline LEMP Draft Structure was shared with TDC for agreement.
11 June 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making
18 June 2024	KCC, DDC, TDC and National Grid Meeting – Landscape and Visual	Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB
19 June 2024	TDC, DDC, KCC and National Grid Meeting – Socio-economics, Recreation and Tourism	Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.
03 July 2024	TDC, DDC, KCC and National Grid Meeting – Air Quality	Project update and timeline, proposed Air Quality Management Plan, proposed air quality monitoring locations during construction and unclosed statutory consultation topics.

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
23 July 2024	TDC, DDC, KCC and National Grid Meeting - Transport	Targeted consultation – design changes, additional PEI (Traffic and Transport), Core Working Hours, Public Rights of Way – PEIR Findings (Traffic and Transport), Emerging Design, Statutory Consultation Feedback – AOB.
July 2024	TDC and National Grid – Ecology Information Shared	A note on the creation of wet grassland for golden plover in Kent (now superseded and not a part of the DCO Application) was shared with TDC for information only by National Grid,
02 August 2024	TDC and National Grid – Landscape and Visual Information Shared	National Grid shared the Sea Link Growth Rates and Photosheet VP Template was shared with TDC for agreement.
20 August 2024	TDC, DDC, KCC, East Suffolk Council (ESC) and National Grid – Landscape and Visual Thematic Meeting	Project update and timeline, discussion related to material issued on 4 June 2024 and 2 August 2024 regarding growth rates now superseded, indicative species mix, and outline LEMP, additional LVIA updates, AOB.
28 August 2024	TDC and National Grid – Landscape and Visual Information Shared	National Grid shared the Sea Link Kent Landscape and Visual Value, outline LEMP Draft Structure, Sensitivity Ratings and Sequential Cumulative Visual Assessment with TDC for agreement and the Visual Appendix Structure Example – Bramford to Twinstead Reinforcement Project (BTNO) BTNO1 and 2 for comment.
17 September 2024	TDC, DDC, KCC, EA and National Grid Meeting – Kent Hydrology EIA	Project update and timeline, progress on Water Framework Directive, project activities on River Stour floodplain, discussions, next steps and AOB.
14 October 2024	TDC and National Grid – Landscape and Visual Information Shared	National Grid shared the Kent Indicative Species Mix with TDC for agreement and the Draft Mitigation Design package for comment.
15 October 2024	TDC, DDC, KCC, AECOM and National	Project update and timeline, discussion on materials on growth rates now superseded, indicative species mix and outline LEMP, issued to stakeholders, mitigation plans,

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
	<i>Grid – Landscape and Visual Thematic Meetings</i>	<i>landscape mitigation function, targeted consultation comments, AOB.</i>
<i>16 October 2024</i>	<i>TDC and National Grid – Air Quality Information Shared</i>	<i>National Grid shared the air quality assessment methodology with TDC to confirm and the construction monitoring locations to be agreed.</i>
<i>16 October 2024</i>	<i>TDC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Table of Agreement with TDC for comment.</i>
<i>12 November 2024</i>	<i>TDC and National Grid – Cumulative Effects Information Shared</i>	<i>The Cumulative Effects Long List and Short List was shared with TDC by National Grid for comment and feedback, with comments requested to be provided within 3 days of the date the long and short lists were shared.</i>
<i>27 November 2024</i>	<i>TDC and National Grid – Socioeconomics, Recreation and Tourism Information Shared.</i>	<i>The PRoW Technical Note on the approach to assessing the PRoW was shared with TDC by National Grid for comment. A response was received by TDC which stated that there were no specific comments to be made on the methodology technical note.</i>
<i>November 2024</i>	<i>TDC and National Grid – Ecology Information Shared</i>	<i>The Kent Vantage Point Survey and collision risk assessment and a summary of the impact assessment and proposed mitigation for Kent (not a part of the DCO documentation, but used as the basis for the Kent ES Chapters) was shared with TDC for information only by National Grid,</i>
<i>November 2024</i>	<i>TDC and National Grid – Ecology Information Shared</i>	<i>The draft Habitat Regulations Assessment (HRA) was shared with TDC for comment by National Grid,</i>
<i>10 December 2024</i>	<i>TDC, DDC, KCC Natural England (NE) and National Grid Terrestrial Ecology Thematic</i>	<i>Approach to Biodiversity Net Gain</i>

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
	<i>Meeting (Kent proposals)</i>	
7 January 2025	<i>TDC, DDC, KCC, AECOM and National Grid – Landscape and Visual Thematic Meetings</i>	<i>Project update and timeline, discussion relating to table of agreement, discussion relating to landscape mitigation plans, AOB.</i>
21 January 2025	<i>TDC, DCC, KCC and National Grid Meeting – Air quality thematic meeting</i>	<i>Air quality thematic meeting to provide a project update, to discuss the assessment findings, and to agree the air quality monitoring locations proposed for the construction phase.</i>
21 January 2025	<i>TDC, DDC, KCC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)</i>	<i>Discussion of golden plover mitigation parcel, including the fact wintering bird surveys are being undertaken and have confirmed presence of golden plover, and that lighting only affects the eastern boundary. Confirmation that Natural England consider the updated collision risk assessment addresses their main concerns, with only some limited further comments. Confirmation Natural England have no specific comments on the type of deflector chosen for the new section of overhead line. Confirmation there will be a stand-by generator as part of operation of development. Confirmation there will be scrapes created along the River Stour as long-term enhancement within South Richborough Pasture Local Wildlife Site. Use of instant hedges for closing temporary gaps.</i>

## 3. Areas of Discussion Between the Parties

### 3.1 Policy, consenting route, coordination and site selection.

**Table 3.1 Policy, consenting route, coordination and site selection**

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.1.1	N/A	DCO consenting route	The Consultee agrees with the approach to the DCO consenting route.	On 31 March 2022, the Secretary of State (SoS) issued a direction under Section 35 of the Planning Act that the Proposed Project is to be treated as a proposed application for which development consent is required. In making the direction, the SoS is of the view that the Proposed Project is nationally significant.	Agreed
3.1.2	N/A	National Policy Statements for Energy	The Consultee agrees that the Proposed Project is to be determined in accordance with the NPSs referred to in National Grid's position.	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement (NPS) for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5).	Agreed
3.1.3	N/A	Status of Development Plan policy	The Consultee agree that the relevant local policy is the currently adopted development plan policy relevant to the Proposed Project's location in Thanet is the Thanet Local Plan, July 2020.	While the assessment of the application for development consent for the Proposed Project should be made against the NPSs referred to above, the Development Plan for each Local Authority is likely to be an important and relevant consideration. National Grid agrees that the currently adopted Thanet Local Plan is the relevant local policy for the Proposed Project.	Agreed
3.1.4	N/A	Development Plan allocations	Development in the Countryside/Urban boundary & village confines. NB – although not Development Plan allocations, national and international ecological designations are noted.	The Development Plan allocations in the column to the right are relevant to the Proposed Project and have been considered within the draft Order Limits.	Agreed
3.1.5	N/A	Need for the project	The principle of network reinforcement is agreed, however, the Consultee cannot agree to the individual statements made, as set out in the National Grid position, without additional information about the performance of the existing network,	The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons: 1) the existing transmission network was not designed to transport electricity from	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
			quantum of electricity generated by different sources onshore/offshore, up to date forecasting information on 2050 demand, and further information on sensitivity testing/option scoping about upgrading the existing network (whether this is technically possible or cost prohibitive). The determination on the need for the Proposed Project will be a matter for the Secretary of State (SoS).	<p>where we increasingly now generate it (largely offshore)</p> <p>2) the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport</p> <p>3) as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses</p> <p>4) upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.</p> <p>The Proposed Project is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future and the Proposed Project is considered as a critical national priority (CNP) in accordance with NPS EN-1 paragraph 3.2.8. National Grid confirm that there is no update on the positions of both National Grid and the Consultee to date and agree that the determination of the Proposed Project is a matter for the SoS.</p>	
3.1.6	<p><b>Application Document 8.3 Strategic Options Report (October 2023)</b></p> <p><b>Application Document 7.2 Strategic Options Back Check Report</b></p>	Strategic Options	The Consultee does not agree to the strategic options set out by National Grid at this time and require ongoing justification on these from National Grid.	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report ( <b>Application Document 8.3 Strategic Options Report (October 2023)</b> ), version A, October 2023, included as part of Statutory Consultation, is under discussion with the Consultee.	Under discussion
3.1.7	<b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023)</b>	Site Selection	<p>.</p> <p>The Consultee does not agree to the site selection set out by National Grid at this time and require ongoing justification on this from National Grid.</p>	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023 ( <b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023)</b> ), included as part of Statutory Consultation, is to be agreed with the Consultee. This matter remains under discussion with the Consultee and National Grid have confirmed that more information regarding the Site Selection	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
				can be shared with the Consultee in future if necessary.	

## 3.2 Draft DCO

Table 3.2 Draft DCO

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.2.1	<b>Application Document 3.1 draft Development Consent Order</b>  <b>Application Document 7.12.2 Design Principles – Kent</b>	Schedule 3: Requirements	The detailed design of the converter station should be submitted for agreement with the relevant planning authority (TDC) prior to construction, as well as being carried out in accordance with the Converter Station Design principles. It is not acceptable to the Council that National Grid could build anything in general accordance with a document yet to be assessed. This requirement must be reworded accordingly, so for example - "No part of the authorised development is to commence until details of the siting, design, external appearance, lighting, site access (including emergency access) and dimensions of any element of Work no.9 and 11 have been submitted to and approved by the relevant planning authority etc"	The wording of the Converter Station Design Requirement (Requirement 3) has been altered to present a position where the Local Planning Authorities (LPAs) will be provided with details of the layout, scale and external appearance to confirm these conform to the Key Design Principles. The Key Design Principles ( <b>Application Document 7.12.2 Design Principles – Kent</b> ) were provided to LPAs for comments, and comments taken into account in the finalisation of the document to submit with the DCO Application.	Under discussion
3.2.2	<b>Application Document 3.1 draft Development Consent Order</b>	Schedule 3: Requirements	The Consultee welcome the inclusion of the public rights of way management plan Kent, as with the other document cited and await copies of the document as soon as these can be shared.	Noted with thanks.	Agreed
3.2.3	<b>Application Document 3.1 draft Development Consent Order</b>	Schedule 3: Requirements	Construction working hours. Please note the Council's consultation comments dated 7th August raising concerns with construction occurring on Sundays and Bank holidays. First preference is that these days are removed from the working hours available.	The Sea link project is required urgently to provide connections to developments required to meet net zero targets. Limiting hours for construction could provide a constraint on the construction period, elongating construction and increasing the risk that timescales will not be met.	Under discussion
3.2.4	<b>Application Document 3.1 draft Development Consent Order</b>	Schedule 3: Requirements	It is an expectation that this requirement will be updated to refer to the outline landscaping strategy currently being formulated by National Grid, to ensure that the detailed planting scheme accords with that document (which should be submitted with the DCO if not before for comment).	Former Requirement 8 has been removed from the draft DCO because the LEMP and Construction Environmental Management Plan (CEMP) are now to be provided in final versions for approval pursuant to Requirement 6. The outline landscaping strategy will be provided as part of LEMP with the application, and the final landscaping strategy provided as part of the final	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
				LEMP for approval by the local planning authority. Therefore, there is now no need for the separate Requirement on mitigation planting included previously.	
3.2.5	Application Document 3.1 draft Development Consent Order	Schedule 4: Discharge of requirements	28 days should be replaced with eight weeks as above, with 35 days removed (or split out to outline if invalid for x days)	National Grid has agreed to elongate the period for discharge of requirements from 28 days to 35 days. This reflects a compromise position between the parties and also reflects the wording in the Bramford to Twinstead DCO that was made in September 2024. This has been amended in paragraph 3(2).	Agreed
3.2.6	Application Document 3.1 draft Development Consent Order	Schedule 4: Discharge of requirements	28 days should be replaced by "eight weeks" at paragraph 1(1)	Bramford to Twinstead and Yorkshire Green have both been made with a period of 35 days. National Grid is happy to agree to a compromise position of elongating this timescale to 35 days and has reflected the change in the draft DCO.	Agreed
3.2.7	Application Document 3.1 draft Development Consent Order	Schedule 4: Discharge of requirements	The wording of paragraph to should be updated to reflect similar timescales to the Cleve Hill DCO, as below: "2) If the discharging authority considers that further information is necessary and the requirement concerned contained in Part 2 of this Schedule does not specify that consultation with a consultee is required, the discharging authority must, within ten business days of receipt of the application, notify the undertaker in writing specifying the further information required. (3) If the requirement concerned contained in Part 2 of this Schedule specifies that consultation with a consultee is required, the discharging authority must issue the application to the consultee within five business days of receipt of the application and notify the undertaker in writing specifying any further information requested by the consultee within five business days of receipt of such a request."	The drafting in Schedule 4 has been increased to elongate the timescale for discharge in paragraph 1 from 28 days to 35 days, and the timescale for requesting further information from 2 to 7 days. The current wording is reflected in previous National Grid DCOs and is considered more appropriate than the wording of the Cleve Hill DCO.  National Grid is happy to discuss a PPA to contribute towards costs associated with the discharge of requirements.	Under discussion

3.3 Consultation

Table 3.3 Consultation

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.3.1		Consultation Strategy	The Consultee agreed with the Consultation Strategy provided on 20 October 2022.	The Consultation Strategy has been prepared taking account of input from the Consultee. The final version was issued to the Consultee on 20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	Agreed
3.3.2		Consultation Zones	The Consultee agrees to the Consultation Zones set out in the Consultation Strategy.	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory.	Agreed



### 3.4 Landscape and Visual

**Table 3.4 Landscape and Visual**

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.4.1	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Landscape Character baseline	The Consultee raised no concerns on the basis of the landscape assessment set out in the PEIR and acknowledged that the ES will provide further information. Agreement confirmed on the approach within 16 April 2024 meeting.	The Landscape Character Areas (LCAs) were set out in the baseline section of the PEIR. The Statutory Consultation response from the Consultee requested further detail of the key characteristics of the LCAs which have been included within the ES (see <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b> ).	Agreed
3.4.2	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Visual Amenity baseline	The Consultee raised no concerns of the representative viewpoint selection as set out in the PEIR and confirmed agreement confirmed on the approach within 16 April 2024 meeting.	The representative viewpoints were set out in the baseline section of the PEIR and are within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b> .	Agreed
3.4.3	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Assessment of effects	The Consultee acknowledged and agreed the approach to the assessment of effects within 20 February 2024 meeting.	The assessment of effects on landscape character and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment and effects on landscape character and visual amenity have been further assessed with more detail within <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b> in line with the methodology and professional judgement. This has also included an assessment of effects at operation year 15.	Agreed
3.4.4	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Study Area	The Consultee agreed the study area within 16 April 2024 meeting.	The Study Area, which comprises an area 3 km from the Order Limits, including the Minster Converter Station, Minster Substation, HVAC overhead line and from the proposed landfall, was set out within the PEIR and has remained the same for the assessment presented in the ES (see <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b> ).	Agreed
3.4.5	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual</b>	Growth rates of mitigation planting and photomontages	The Consultee has raised no concerns about the year 1 and year 15 photomontage approach and no further comments from the Consultee have been received at this time.	National Grid has discussed the growth rates of mitigation planting with the Consultee and the photomontages have been produced for the ES at year 1 and year 15 of operation.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.4.6	<b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology</b>	LVIA methodology	The Consultee confirmed agreement on the approach to the LVIA methodology within 16 April 2024 meeting.	The LVIA methodology was set out within the PEIR and is the same for the ES with minor amendments following the published Guidelines on Landscape and Visual Impact Assessment (GLVIA) 3 Clarifications Technical Guidance Note.	Agreed
3.4.7	<b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology</b>	Photomontage methodology	The Consultee confirmed agreement on the approach to the photomontage methodology within 16 April 2024 meeting.	The Photomontage methodology was updated following the PEIR and is intended to be the same for the ES.	Agreed
3.4.8	<b>Application Document 7.11.2 Design Approach Document – Kent</b>  <b>Application Document 7.12.2 Design Principles – Kent</b>	Design principles and landscape strategy and mitigation plans	The Consultee was made aware of the ongoing design process and has been involved in this process during thematic meetings when discussing proposed landscape strategy. Information on the design principles, landscape strategy and mitigation plans were reissued by National Grid to the Consultee following meeting held on 8 January 2025 and no comments have been received to date.	Design principles have been prepared and accompany the ES and draft mitigation plans have been shared with stakeholders. These are set out in <b>Application Document 7.11.2 Design Approach Document – Kent</b> and <b>Application Document 7.12.2 Design Principles – Kent</b> .	Under discussion
3.4.9	<b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent</b>	Outline Landscape and Ecology Management Plan	The Consultee was made aware of the progress on the Outline Landscape and Ecology Management Plan (LEMP) and updates have been feedback to the Consultee in thematic meetings that have been ongoing. The structure has been shared with the Consultee and the Consultee has agreed to the approach to separate outline LEMP reports for Suffolk and Kent.	Objectives have been set out and this has been included in the production of materials to account for the ongoing ecology survey work. This has been set out in <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent</b> .	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.4.10		Indicative Species Mixes	The Consultee raised questions on the indicative species mix and confirmed that agreement could not be reached at this time. No response from the Consultee has been received yet from information reissued by National Grid on 8 January 2025.	National Grid require agreement from the Consultee on the indicative species mixes. This includes the proposed mix % distribution and range of heights to be used in the year 15 visualisations (where relevant). This includes a variable distribution across the species to increase future resilience. National Grid have set out an indicative species mix and are waiting for agreement on this from the Consultee. This was issued to the Consultee on 14 October 2024.  National Grid agree that the species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO ( <b>Application Document 3.1 draft DCO</b> ).	Under discussion
3.4.11		Photosheet template	National Grid issued the photosheet template, but the Consultee is yet to agree the approach to the photosheet.	The photosheet template (which is not an application document but was shared for reference) for the site photos and images was issued by National Grid to the Consultee on 2 August 2024 and requested comments on the template, but no comments from the Consultee have been received to date.	Under discussion
3.4.12		Cumulative sequential visual assessment	National Grid issued the Sequential Cumulative Visual Assessment document on 28 August 2024, but the Consultee is yet to agree the approach to the assessment.	The Sequential Cumulative Visual Assessment (which is not an application document but was shared for reference) was issued by National Grid to the Consultee and requested comments on the document, but no comments have been received from the Consultee to date.	Under discussion
3.4.13		Landscape and Visual value judgements	The Consultee received the Kent L&V Value document from National Grid for review and comment on 28 August 2024, but no comments have been received from the Consultee to date.	The Kent Landscape and Visual Value document (which is not an application document but was shared for reference) was issued by National Grid to the Consultee and requested comments on the document, but no comments have been received from the Consultee to date.	Under discussion
3.4.14		Landscape and visual sensitivity ratings	The Consultee received the Sensitivity Ratings document from National Grid for review and comment on 28 August 2024, but not comments have been received from the Consultee to date.	The Sensitivity Ratings document (which is not an application document but was shared for reference) was issued by National Grid to the Consultee and requested comments on the document, but no comments have been received from the Consultee to date.	Under discussion
3.4.15		Visual Appendix Structure Example	The Consultee received, on 24 August 2024, the Visual Appendix Structure Example - BTNO1 and 2 document from	The Visual Appendix Structure Example - BTNO1 (which is not an application document but was shared for reference) and 2 document was issued by National	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
			National Grid on 02 August 2024 for review and comment, but no comments have been received from the Consultee to date.	Grid to the Consultee and requested comments on the document, but no comments have been received from the Consultee to date.	

3.5 Ecology and Biodiversity

Table 3.5 Ecology and Biodiversity

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.5.1	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity	Use of trenchless solution for Thanet Coast & Sandwich Bay Special Protection Area (SPA)	The use of trenchless solution for Thanet Coast and Sandwich Bay SPA is still under discussion with the Consultee and National Grid as the Consultee requires further information on the trenchless methodologies from National Grid.	The trenchless solution has been confirmed as the approach to be taken by National Grid. The main works contractor will confirm which specific trenchless technique will be implemented as and when required.	Under discussion
3.5.2	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity  Application Document 6.6 Habitats Regulations Assessment Report	Offsetting loss of fields used by golden plover	The Consultee notes the strategy has been discussed with Natural England and agreed in principle with them. The Consultee notes Natural England have primacy on this issue since it is an HRA matter.	National Grid considered options, including identifying an area of farmland in the lower Stour Valley, larger than the area of arable land to be permanently lost, and convert it to grazing marsh/damp grassland. This has been deemed acceptable offsetting to Natural England for other DCOs and gives National Grid the potential to provide a net ecological benefit over arable land. The ES sets out that any temporary displacement of the golden plover during construction would be offset in the long term through the creation of woody and wetland habitat around the Minster Converter Station and Substation.  National Grid have noted that the Consultee has asked for confirmation that lighting proposed is not inappropriate. National Grid confirmed that the golden plover mitigation area has been subject to wintering bird survey which has recorded use by golden plover. This has been covered in the <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b> and <b>Application Document 6.6 Habitats Regulations Assessment Report</b> .	Agreed
3.5.3	Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity  Application Document Application Document 7.5.3.2 CEMP Appendix B Register of	HVDC cable crossing of Thanet Coast & Sandwich Bay (SPA) and Ramsar site	The HVDC cable crossing of Thanet Coast and Sandwich Bay (SPA) and Ramsar site is still under discussion between the Consultee and National Grid as insufficient information to the offsetting of the habitat loss has been provided.	National Grid confirmed that they would not be following the trenched installation method implemented by Nemo Link and that the intention is to use trenchless techniques. National Grid confirmed that trenchless methods will be possible and has been committed to in the DCO application under <b>Application Document Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> and <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan</b> , such that there will be no surface excavation of saltmarsh. Risk of 'frac out' is also considered in the ES ( <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b> ). National Grid has not considered a significant risk of 'frac out'	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
	Environmental Actions and Commitments (REAC)  Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan			as part of the Proposed Project works. Geotechnical studies confirming HDD is possible forms part of the DCO documents ( <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b> , <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan</b> and <b>Application Document Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> ).	
3.5.4	<b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b>	Horizontal Direct Drilling (HDD)	The matter of horizontal direct drilling is still under discussion with the Consultee and National Grid as further information on the location and impacts of HDD is required by the Consultee.	National Grid to provide further information on location and impacts of the HDD as well as the jack up barge (which is equipment used for offshore drilling) following submission of the DCO application.	Under discussion
3.5.5	<b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b>	Collision risk from new overhead line	The Consultee agreed with the approach to collision risk, by using hanging bird diverters, from the new overhead line and agreed with the conclusion made by Natural England.	National Grid confirmed collision risk assessment has concluded no significant collision risk to birds and has been supported by 12 months of vantage point surveys of the line location, and carcase searches of the existing Overhead Line (OHL). Mitigation has been included in the form of hanging bird diverters, which have been set out in <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> . A collision risk assessment has been reviewed by Natural England who agree with its basic conclusion.	Agreed
3.5.6	<b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b>	Recovery of mudflats	The Consultee states that National Grid needs to ensure recovery of the mudflats in the intertidal zone from the HDD connection works. The Consultee review any details on mudflat recovery following submission of the DCO application.	National Grid is providing details on mudflat recovery in ES for DCO ( <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity</b> ). The ES states that whilst there would be disturbance to the mudflats from the excavator and concrete bags, this would only be temporary and would be localised to a small area of the mudflats. Therefore, it is expected that the mudflat would experience rapid recovery.	Agreed
3.5.7	<b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and</b>	Riparian mammal habitat continuity	The Consultee states that National Grid need to provide details of the type of culvert to be used to ensure no disruption of connectivity in ditches. The Consultee will review information on the type of culvert and the riparian mammal habitat continuity following submission of the DCO application.	National Grid confirms that the type of culvert has been set in DCO and Register of Environmental Actions and Commitments ( <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> ). This will be designed to preserve the bed of the ditch and allow connectivity for riparian mammals.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
	Commitments (REAC)				

3.6 Cultural Heritage

Table 3.6 Cultural Heritage

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.6.1		County Council and Historic England – responsibility for cultural heritage	The Consultee agrees with the approach that Kent County Council and Historic England have the primary responsibility on cultural heritage matters, so the Consultee defers all matters to them.	National Grid agrees that Kent County Council and Historic England are the primary stakeholders for cultural heritage and archaeological matters and have been having meetings and discussions with these parties. National Grid notes that the Consultee has been party to these discussions.	Agreed

### 3.7 Water Environment and Flood Risk

Table 3.7 Water Environment and Flood Risk

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.7.1		Project responses to statutory consultation comments	The Consultee agreed that responses to statutory consultation comments were appropriate.	Comments from the statutory consultation relating to flood risk, land drainage and hydrology within the Kent scheme were presented with individual responses showing how these will be addressed going forward. In the Consultee's consultation response, the Consultee primarily noted what has been proposed and set out for water environment and flood risk, but requested further information on temporary alternative drainage routes, the proposed scheme of pre-construction land drainage and the surface water runoff measures. The Consultee noted that matters should be deferred to KCC as the Lead Local Flood Authority (LLFA). National Grid confirmed that the National Grid responses were presented to the Kent LPAs at the same time, with agreement on this approach being obtained from the Consultee.	Agreed
3.7.2	<b>Application Document 6.8 Flood Risk Assessment</b>	Flood Risk Assessment (FRA) approach	The Consultee agreed that the proposed scope of the FRA is suitable.	The scope of the FRA has been prepared to support the DCO application has been presented to the Consultee. The scope covered the sources of flood risk that have been assessed, the policy and guidance that has been followed and the datasets that have been referenced to inform it. The scope agreed is shown in <b>Application Document 6.8 Flood Risk Assessment</b> .	Agreed
3.7.3	<b>Application Document 6.8 Flood Risk Assessment</b> and <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment</b>	Groundwater flood risk at Kent converter station site	The Consultee agreed to the conclusions relating to groundwater flood risk at the Kent converter station site and approach to drainage as set out within <b>Application Document 6.8 Flood Risk Assessment</b> and <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment</b> .	Conclusions of the groundwater monitoring and flood risk assessment at the converter station site show an overall low risk of groundwater emergence at the site. Due to the poor infiltration, drainage solutions relying on infiltration during construction and operation will not be suitable or practical. National Grid have shared the groundwater flooding technical note shared with the Consultee, which is not an application document, for information only.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
				The groundwater flood risk and approach to this is presented in <b>Application Document 6.8 Flood Risk Assessment</b> and <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment</b> .	
3.7.4	<b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment</b>	Dewatering requirements	The Consultee has agreed, in principle, to dewatering requirements, as set out in National Grid's position.	Permits that might potentially be required if dewatering is required: discharge consent, abstraction licence, flood risk activity permit (FRAP)/land drainage consent (LDC) (for IDB watercourse-related activities).	Agreed
3.7.5	<b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>	Proposed drainage designs	The Consultee has agreed, with no comments to be made on approach to proposed drainage designs.	A combination of filter drains, cut-off drains, and attenuation ponds are proposed to be used along cable route within construction compounds to manage drainage. All permanent and temporary drainage will be in line with Construction Industry Research and Information Association (CIRIA) Sustainable Drainage Systems (SuDS) guidance. This has been secured in the REAC ( <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b> ).	Agreed



3.8 Geology and Hydrogeology

Table 3.8 Geology and Hydrogeology

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.8.1	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application.	National Grid will provide the Consultees with the final geology and hydrogeology assessment methodology set out in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology</b> following submission of the DCO Application. As such, this matter is still under discussion.	Under discussion
3.8.2	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology	Mitigation presented in the ES and Outline CEMP ( <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan</b> )	The Consultee will review the proposed mitigation following the submission of the DCO application.	National Grid will provide the Consultees with the proposed mitigation for geology and hydrogeology effects set out in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology</b> following submission of the DCO Application. As such, this matter remains under discussion.	Under discussion
3.8.3	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology	Assessment conclusions presented in the ES.	The Consultee will review the assessment conclusions following the submission of the DCO application.	National Grid will provide the Consultees with the geology and hydrogeology assessment set out in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology</b> . As such, this matter remains under discussion.	Under discussion

3.9 Agriculture and Soils

Table 3.9 Agriculture and Soils

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.9.1	Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application.	National Grid will provide the Consultees with the final agriculture and soils assessment methodology set out in <b>Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture &amp; Soils</b> following submission of the DCO Application. As such, this matter is still under discussion.	Under discussion
3.9.2	Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils and Application Document 7.5.10.2 Outline Soil Management Plan – Kent	Mitigation presented in the ES and Outline Soil Management Plan	The Consultee will review the proposed mitigation following the submission of the DCO application.	National Grid will provide the Consultees with the proposed mitigation for agriculture and soils effects set out in <b>Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture &amp; Soils</b> and <b>Application Document 7.5.10.2 Outline Soil Management Plan – Kent</b> following submission of the DCO Application. As such, this matter remains under discussion.	Under discussion
3.9.3	Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils.	Assessment conclusions presented in the ES	The Consultee will review the assessment conclusions following the submission of the DCO application.	National Grid will provide the Consultees with the agriculture and soils assessment set out in <b>Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture &amp; Soils</b> . As such, this matter remains under discussion.  The soil management plan is secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft DCO</b> .	Under discussion

### 3.10 Traffic and Transport

Table 3.10 Traffic and Transport

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.10.1	<b>Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport</b>	Traffic and Transport	The Consultee defers to KCC Highways for matters relating to Traffic and Transport, including to review the impact of the development on the highway network.	National Grid has consulted KCC Highways accordingly and an assessment of the potential impact of the Proposed Project on the highway network is set out in <b>Application Document 6.2.3.7 ES Part 3 Chapter 7 Traffic and Transport</b> .	N/A
3.10.2	<b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b>  <b>Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport</b>	Public Rights of Way (PRoW)	The Consultee expects the proposals (construction phase) to adversely impact PRoW users, due to construction traffic, new pylons, PRoW crossings and temporary diversions.	The assessment of PRoW Diversions and Closures within <b>Application Document 6.2.3.7 ES Part 3 Chapter 7 Traffic and Transport</b> has been reviewed based on the feedback received from KCC. The traffic and transport assessment does not identify any significant impacts on PRoW in terms of diversions and closures, with the proposed embedded mitigation and control and management measures in place.	Under Discussion
			The Consultee acknowledges that an Outline PRoW MP will be provided as part of the DCO submission, which should be prepared in consultation with the KCC PRoW team.	<b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> , as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft DCO</b> , has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases, as well as details on the roles and responsibilities of the contractor and National Grid relating to PRoW.	Agreed
3.10.3	<b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b>  <b>Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport</b>	Local Highway Network	<p>The Consultee expects construction traffic to adversely impact the local highway network, particularly if construction access is taken via Tothill Street or Ebbsfleet Lane North.</p> <p>The Consultee raises a concern that Minster should not be used for any construction traffic (even as secondary access).</p>	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> and secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft DCO</b> . The traffic and transport assessment within <b>Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport</b> does not identify any significant impacts on the highway network during the construction phase	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
				<p>with the proposed embedded mitigation and control and management measures in place.</p> <p>With respect to Ebbsfleet Lane North, this will be a secondary access used for approximately six months during construction for vegetation clearance works, utility diversion works of the OHL, survey works and limited mobilisation movements associated with the construction of the A256 access.</p> <p>With regard to Minster, local roads including Tothill Street, High Street and Marsh Farm Road will only be used to undertake temporary diversion works to the OHL, including constructing a temporary structure, realigning conductors and building scaffold protection towers. Such activities are considered to be equivalent to maintenance of OHL that are already in place.</p>	
			The Consultee states that there should be no ability for vehicles to access Ebbsfleet Lane North from K-BM02 (A256 access).	The new access point from the A256 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.	Agreed
			The Consultee requests that the potential implications of the new construction compound on Sandwich Road is assessed.	Noted, this has been assessed within <b>Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport.</b>	Agreed
3.10.4	<b>Application Document 2.13.2 Design and Layout Drawing – Kent</b>	Access	The Consultee considers K-BM02 (A256 access) to be inadequate due to the national speed limit and limited filter lanes for slow traffic to join.	The junction has been designed to be fully compliant with Design Manual for Roads and Bridges (DMRB) and a Designer's Response to the Road Safety Audit (RSA) Stage 1 has been produced outlining the changes made in response to the RSA's comments.	Under discussion
			The Consultee acknowledges that a Stage 1 RSA has been carried out and advice has been taken from KCC Highways to determine the approach to access. The proposed layout of the access from the A256 should be updated once the RSA has been undertaken.	The Stage 1 RSA has been shared with the Consultee and KCC Highways. The proposed design/layout of the A256 access has been revised to consider any recommendations where necessary.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
			The Consultee welcomes the removal of the Jutes Lane construction access (except for during utility connection works).	This has been noted by National Grid.	Agreed
3.10.5		Consultation	The Consultee requests to be kept informed as surveys are completed, outstanding data becomes available, final options/access routes are selected and mitigation/environmental commitments are identified, to resolve concerns (highway network impacts) prior to DCO submission. The Consultee requests an invitation to attend the meetings where ongoing discussions with KCC Highways and PRow Officers will take place.	The Consultee was invited to transport thematic meetings, which covered the Consultee's comments in the column to the right and the Consultee has agreed to the approach to thematic meetings and information sharing once it was available. The meetings attended by the Consultee included those held on 16 April 2024, 2 May 2024 and 23 July 2024 with KCC Highways and PRow Officers. The Consultee's officers attended two of these meetings (apologies were sent for the meeting on 2nd May 2024).	Agreed



3.11 Air Quality

Table 3.11 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.11.1	Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent	Air Quality Monitoring	<p>There are two possible construction traffic routes currently under consideration; if the one nearest the school and dwelling on Jutes Lane is selected, the Consultee’s Environmental Health (EH) team would request that real time air quality sensors are installed to ensure action is taken to avoid episodes of significant dust and included within the dust management plan and CEMP.</p> <p>The Consultee notes that the option to use Jutes Lane for construction traffic (other than utility connections) has been removed and this is welcomed.</p>	An outline Air Quality Management Plan ( <b>Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent</b> ) has been prepared and secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft DCO</b> , detailing the proposed monitoring during the construction phase. This sets out where air quality sensors will be placed and installed, including in places where receptors are present.	Agreed
3.11.2		Air Quality Monitoring	The Consultee confirms that specific monitoring locations are to be agreed at a later date.	Specific monitoring locations are to be agreed with the Consultee as discussions progress.	Under discussion
3.11.3	Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality	Ecology	The Consultee notes that the air quality chapter and noise chapters relate only to impact on human health and not the natural environment, this should be dealt with in the Ecology section of the ES.	Ecological receptors have been considered in the assessment and have been added to the ES in Kent Chapter 8 ( <b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality</b> ).	Agreed

## 3.12 Noise and Vibration

**Table 3.12 Noise and Vibration**

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.12.1	<b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b>	Construction noise and vibration	The Consultee agreed to approach to construction noise and vibration on 27 April 2023 meeting and then further in the follow up meeting on 12 January 2024	The construction noise and vibration assessment methodology is in accordance with BS 5228:2009+A1:2014. Assessment criteria are agreed based on the lower threshold for the 'ABC' method, which is the method used to decide if construction noise could cause significant effect, with 'A' being the lowest threshold and is used as the worst-case scenario. The Consultee has agreed to this approach and how noise and vibration has been assessed within the DCO application ( <b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b> ). National Grid confirm that special consideration has been given to the potential sensitivity to noise of the Great Oaks Small School.	Agreed
3.12.2	<b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b>	Noise survey data	The Consultee agreed to the approach to the noise survey data in a meeting on 27 April 2023 and then the agreed to the approach to background noise levels in July 2023.	National Grid have set out that the baseline noise survey methodology and resultant typical background noise levels for use in the operational noise assessment, which has been agreed by the Consultee. This has been set out in <b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b>	Agreed
3.12.3	<b>Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment</b>	Operational noise	The Consultee agreed to the approach to operational noise in a meeting on 27 April 2023 and further in a follow up meeting on 12 January 2024	National Grid confirm that the Consultee agrees to the assessment methodology and criteria for operational noise assessment, with the assessment set out within <b>Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment</b> .	Agreed
3.12.4	<b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b>	Construction traffic noise	The Consultee agreed to the approach to the construction noise traffic in a meeting on 27 April 2023 and the further agreement in a follow up meeting on 12 January 2024	National Grid confirm that the Consultee has agreed to the assessment methodology for construction noise assessment based on guidance from the DMRB LA 111 Noise and Vibration and Calculation of Road Traffic Noise (CRTN). This has been set out in <b>Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &amp; Vibration</b>	Agreed

3.13 Socioeconomics, Recreation and Tourism

Table 3.13 Socio-economic, Recreation and Tourism

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.13.1	Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent	Public Rights of Way	The Consultee commented in most recent consultation August 2024 that this is a matter for KCC.	The assessment of effects on PRoW will include recreational routes and routes used for access. The National Grid technical team are reviewing what information has been provided to National Grid to date on the assessment to determine if further information on the methodology can be provided to the Consultee. An outline PRoW Management Plan has been produced for the ES which includes closures and diversions to PROW routes ( <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> ).	N/A – deferred to KCC
3.13.2	Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent	Study Area	The Consultee commented in most recent consultation August 2024 that this is a matter for KCC.	The assessment of recreational routes and PRoW recognises that some PRoW will overlap/go beyond the 500 m study area boundary. Where this is the case, the assessment will consider whether there are impacts on the route beyond 500m. Additionally, the PRoW assessment includes consideration of PRoW routes connected via cycle and pedestrian route networks which are impacted by the Proposed Project. The study area has been set out within the ES chapter ( <b>Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism</b> ) and the outline PROW Management Plan ( <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent</b> ).	N/A – Deferred to KCC

3.14 Health and Wellbeing

Table 3.14 Health and Wellbeing

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.14.1		Health and wellbeing assessment	The Consultee does not have any specific comments on the health and wellbeing assessment and defers this to Kent County Council.	National Grid have presented the health and wellbeing assessment and methodology to the Consultee during statutory consultation. The Consultee has confirmed that they do not have any specific comments and defer all matters relating to health and wellbeing to KCC. As such, National Grid has engaged with discussion and correspondence on health and wellbeing matters with KCC instead of the Consultee.	N/A – deferred to KCC
3.14.2	Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health & Wellbeing	Study Area	The Consultee has raised no concerns regarding the study area during statutory consultation or thematic meetings to date and agrees to the study area as set out in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health & Wellbeing.	The Study Area, which comprises three wards within the Consultee’s boundary. These include Cliffsend and Pegwell and Thanet Villages. This study area was set out within the PEIR and is the same for the ES. This was also shown at the meeting in October 2023.	Agreed

3.15 Cumulative Effects

Table 3.15 Cumulative Effects

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.15.1	<b>Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies</b>	Cumulative Schemes - methodology	A meeting was held with the Consultee on 12 November 2024, where the cumulative assessment methodology was presented. The Consultee agreed to the methodology presented in the meeting. However, as this has not been finalised, the Consultee will review the methodology following submission of the DCO application.	<p>National Grid presented the cumulative assessment methodology on 12 November 2024, and this was agreed with the Consultee.</p> <p>National Grid will provide the Consultees with the cumulative effects assessment methodology set out in <b>Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies</b> following submission of the DCO application. As such, this matter is still under discussion.</p>	Under discussion
3.15.2	<b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List and Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List</b>	Cumulative Schemes – short list and long list	<p>A meeting was held with the Consultee on 12 November, where the Short List and Long Lists were presented, with any comments requested to be provided to National Grid within 3 days post this meeting. The Consultee raised an additional 10 developments to be added to the short list.</p> <p>National Grid confirmed that these have been added to the short list. As such, the Consultee agrees to the short list and long list. The Consultee will review the short list and long list following submission of the DCO application.</p>	<p>The long list and short list are provided within <b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List</b> and <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List</b> and include the additional 10 developments raised by the Kent LPAs.</p> <p>The assessment can be updated during examination if developments come forward that would make the short list. This updated assessment would be provided at a suitable deadline in the examination timetable.</p> <p>National Grid will provide the Consultees with the cumulative effects short list and long list as set out in <b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List</b> and <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List</b> following submission of the DCO application. As such, this matter remains under discussion.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	National Grid Current Position	Status
3.15.3	<b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects and Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project</b>	Conclusions of the Cumulative Effects Assessments	<p>The Consultee is yet to agree with the conclusions set out in the Cumulative Effects Assessment (CEA).</p> <p>The Consultee will review these conclusions in due course, following submission of the DCO application.</p>	National Grid will provide the Consultees with the conclusions of the Cumulative Effects assessment following submission of the DCO application. As such, this matter remains under discussion. This has been presented in <b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme 13 Inter-Project Cumulative Effects and Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project.</b>	Under discussion



# 4. Approvals

Signed	
On Behalf of	National Grid
Name	
Position	
Date	

Signed	
On Behalf of	Thanet District Council
Name	
Position	
Date	

## 5. References

- Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>
- The Planning Inspectorate. (2015). *Advice Note two: The role of local authorities in the development consent process*. Retrieved from [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice\\_note\\_2\\_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice_note_2_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20).

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