The Great Grid Upgrade

Sea Link

Sea Link

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Chapter 2
Project-wide (Combined) Effects of the Proposed Project

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2. Project-wide (Combined) Effects of the Proposed Project

2.1 Introduction

2.1.1 This chapter of the Environmental Statement (ES) presents details of the 'project-wide' (combined) effects of the project. Project-wide (combined) effects are defined here as those effects that are considered separately in relation to the three elements of the Proposed Project and reported in separate parts of the ES (these being the Suffolk Onshore Scheme, the Kent Onshore Scheme, and the Offshore Scheme) but which have the potential to be of greater significance when considered in combination. For some technical topics the potential for such project-wide effects is limited or negligible and this is also considered in this chapter.

2.1.2 This chapter describes the methodology used and the project-wide (combined) effects that could result from the Proposed Project.

2.1.3 The Order Limits, which illustrate the boundary of the Proposed Project, are illustrated on **Application Document 2.2.1 Overall Location Plan**. The Suffolk and Kent Onshore Scheme Boundaries are illustrated on **Application Document 2.2.2 Suffolk Location Plan** and **Application Document 2.2.3 Kent Location Plan**. The Offshore Scheme Boundary is illustrated **Application Document 2.2.1 Overall Location Plan**.

2.1.4 This chapter should be read in conjunction with:

- **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**;
- **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**;
- **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**;
- **Application Document 6.2.2.1** to **Application Document 6.2.2.13**;
- **Application Document 6.2.3.1** to **Application Document 6.2.3.13**; and
- **Application Document 6.2.4.1** to **Application Document 6.2.4.11**.

2.2 Regulatory and Planning Context

Legislation

2.2.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereinafter referred to as "the EIA Regulations 2017") (HM Government, 2017)) require that the effects of a project, where these are likely to have a significant effect on the environment, are taken into account in the decision-making process for that project.

2.2.2 Regulation 5(2)(e) of EIA Regulations requires that the EIA must consider the interaction of different individual environmental effects of the Proposed Development.

This chapter details the consideration of these effects for the Proposed Project as far as they pertain to the project as a whole, across the three elements: the Suffolk Onshore Scheme, the Offshore Scheme, and Kent Onshore Scheme.

National Policy

2.2.1 National Policy Statements (NPSs) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Proposed Project would be considered. The following NPS's, which came into force on 17 January 2024, are considered relevant to the Proposed Project:

- Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (2024) ((Department for Energy and Security & Net Zero, 2023);
- National Policy Statement for Renewable Energy Infrastructure EN-3 (NPS EN-3) (2024) (Department for Energy and Security & Net Zero, 2023); and
- National Policy Statement for Electricity Networks Infrastructure EN-5 (NPS EN-5) (2024) (Department for Energy Security & Net Zero, 2023).

2.2.2 Of these three NPSs, only the Overarching NPS for Energy (NPS EN-1) is of direct relevance to this chapter.

2.2.3 Table provides details of the elements of the Overarching NPS for Energy (NPS, EN-1) (Department for Energy and Security & Net Zero, 2023), that are relevant to this chapter, and how and where they are covered within the Environmental Statement (ES).

2.2.4 NPS EN-1 also notes that "...*in the event of a conflict between these documents* [NPPF or Local Development Plan] *and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.* ".

Table 2.1 NPS EN-1 requirements relevant to the Project-wide (Combined) Effects of the Project Assessment

NPS EN-1 Section	Where this is covered in the ES
Paragraph 4.3.19 states that the ES should: '…*consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.'*	This chapter of the ES provides an assessment of project-wide (combined) effects of the Proposed Project.

Local Planning Policy

2.2.5 The following local and regional planning authorities fall within the project-wide (combined) effects study area and due regard has been given to their local planning policies in **Application Document 6.2.2.1** to **Application Document 6.2.2.13** and **Application Document 6.2.3.1** to **Application Document 6.2.3.13**:

- Suffolk County Council;
- East Suffolk Council;

- Kent County Council;
- Thanet District Council; and
- Dover District Council.

2.3 Scoping Opinion and Consultation

Scoping

2.3.1 A Scoping Report for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 (**Application Document 6.14 Environmental Scoping Report 2022**) and a Scoping Opinion was received from the Secretary of State (SoS) on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**). Table 2.2 sets out the comments raised in the Scoping Opinion and how these have been addressed in this ES. The Scoping Opinion takes account of responses from prescribed consultees as appropriate. **Application Document 6.3.1.6.A ES Appendix 1.6.A Response to Scoping Opinion** provides responses to the comments made by the prescribed consultees and how each comment has been or will be considered.

Table 2.2 Comments raised in the Scoping Opinion

ID	Inspectorate's comments	Response
6.3.2	**Justification for scoping in/out receptor groups** Table 5.3.1 identifies where there is a potential pathway for effect both from the onshore and offshore elements of the Proposed Development on receptors. However, the potential for a combined effect is not identified; the ES should explain the pathways for effect for each receptor group.	This chapter assess the potential for project-wide (combined) effects of the project across the onshore / offshore interface
6.3.3	**Methodology** The ES should set out the methodology(s) for assessing significant combined effects.	Section 3.4 of this chapter provides further details on how the assessment has been undertaken.

Consultation and Project Engagement

2.3.2 No consultation has been undertaken specifically in relation to project-wide (combined) effects, although it naturally forms part of any consideration of overall project effects.

2.4 Approach and Methodology

2.4.1 Planning Inspectorate's Advice Note Nine Rochdale Envelope (The Planning Inspectorate, 2018) states:

2.4.2 *"The ES should not be a series of separate unrelated topic reports. The inter-relationship between aspects of the proposed development should be assessed and careful consideration should be given by the developer to explain* ***how inter-relationships have been assessed in order to address the environmental impacts of the proposal as a whole.*** *It need not necessarily follow that the maximum adverse impact in terms of any one topic impact would automatically result in the maximum potential impact when a number of topic impacts are considered collectively. In addition, individual impacts may not be significant when their inter-relationship is assessed. It will be for the developer to demonstrate that the likely significant impacts of the project have been properly assessed."* (Our emphasis)

2.4.3 In addition, the Planning Inspectorate's advice on the assessment of cumulative effects (Planning Inspectorate, 2024) includes the following:

"Development related to the NSIP (including permitted development)

A proposed NSIP may comprise multiple sites in different locations, for example where offsite highways improvements are required. This may include development where consent is sought under a different planning regime such as the Town and Country Planning Act 1990. In these circumstances, ***the applicant should consider if cumulative effects could arise from the different development components of their NSIP****, as well as with other existing and, or approved development."* (Our emphasis)

2.4.4 Although consent for all aspects of the Proposed Project is being sought in the application for development consent, the principle of assessing all of the 'different development components' applies similarly to the three distinct components of the Proposed Project.

2.4.5 In circumstances where projects have been split into individual components / route windows or similar to enable assessment of impacts there is the potential to overlook significant effects that could arise at the project-wide level, but which are not apparent when focusing on the individual components. For the Proposed Project, the ES is split across three components: the Suffolk Onshore Scheme, the Offshore (marine) scheme and the Kent Onshore Scheme. The potential for additional project-wide (combined) effects arises in two main circumstances:

- On the coast, at the interface between an Onshore Scheme and the Offshore Scheme, where impacts from both schemes could impact a single coastal receptor leading to a new significant effect; and
- Across both Onshore schemes, where a number of terrestrial impacts to a widespread terrestrial resource could exceed a threshold for significance which is not apparent when considering one Onshore scheme in isolation.

2.4.6 To undertake this project-wide (combined) assessment the findings of the individual chapters, for those receptors screened in (see Table 2.3 and Table 2.4), have been reviewed to understand and interpret the potential additional effects that may be of greater significance when compared to individual effects arising from one of the three elements of the Proposed Project. Where additional effects are identified, these are considered additively and qualitatively using professional judgement.

2.4.7 The approach undertaken for this assessment is summarised in the following steps.

- Step 1: Review and identification of shared receptors from assessments undertaken for each technical chapter for (i) coastal receptors relevant to the Onshore Schemes

/ Offshore Schemes interfaces and (ii) terrestrial receptors relevant to both the Kent Onshore Scheme and the Suffolk Onshore Schemes.

- Step 2: Assessment of project-wide (combined effects) for any shared receptors identified under Step 1.

Project-wide (Combined) Effects between the Onshore and Offshore Schemes

2.4.8 Given the proximity of the two Onshore schemes to the Offshore scheme (i.e. they are immediately adjacent), there is greater potential for project-wide (combined) effects to occur in coastal areas between the Offshore Scheme and either of the Onshore Schemes. The Suffolk Onshore Scheme and the Kent Onshore Scheme both extend down to the mean low water springs (MLWS) mark as illustrated on **Application Document 2.2.2 Suffolk Location Plan** and **Application Document 2.2.3 Kent Location Plan**. The Offshore Scheme extends up to the mean high-water springs (MHWS) mark as illustrated on **Application Document 2.2.1 Overall Location Plan**.

2.4.9 Table 2.3 considers any potential pathways for a project-wide (combined) effect to occur on receptor groups between the Onshore and Offshore Schemes. The receptor groups were identified using the professional judgement of technical specialists who identified receptor categories that might be relevant, for any project, in coastal locations at the offshore / onshore interface. These were then further reviewed to determine whether, in the case of the Proposed Project, circumstances arise where a potential effect could occur.

Table 2.3 Potential for project-wide (combined) effects between Onshore / Offshore schemes

Receptor groups	Potential for a project-wide (combined) effect
Landscape elements / Seascape character	Landscape character is considered wholly in the context of the Onshore Schemes, with Seascape character separated out for the Offshore Scheme. There is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Residential receptors / Communities / Human Health	There are no residential receptors or communities in the marine environment and similarly human health is addressed solely within the Onshore schemes. There is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Commercial receptors	There are no shared commercial receptors between the onshore and the offshore environments. No potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Designated Sites	Some coastal designated sites straddle both the onshore and the offshore environments. **There is therefore a potential**

Receptor groups	Potential for a project-wide (combined) effect
	pathway between onshore and offshore sources of impact that could potentially result in combined effect on receptors within this receptor group.
Terrestrial and aquatic ecological receptors / Notable Habitats (terrestrial and aquatic)	These receptors are entirely terrestrial / freshwater and are assessed accordingly within the Onshore Scheme terrestrial ecology chapters. There is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Designated heritage assets / Non-designated heritage assets	These receptors are entirely terrestrial and receptors are considered on an individual basis, with marine archaeology separated out for assessment (see below).As such there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already to be assessed in the individual chapters.
Water resources (existing abstractions and discharges) / Watercourses and waterbodies / Flood risk receptors / Groundwater	There are no water resources, watercourses or waterbodies or flood risks receptors in the marine environment (other than the sea itself). Groundwater is assessed in the context of the Onshore schemes. There is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Agricultural Land / Agricultural holdings / Soil	There is no agricultural land, agricultural holdings or soils at sea. There is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Public rights of way / Cycle Routes / Roads	These resources are not present ion the marine environment and there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Onshore Geology / Offshore Geology	Geological receptors are assessed within the Onshore and Offshore Schemes as relevant and this distinction means there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Marine Physical Environment	The marine physical environment, including potential impacts in the coastal zone, is entirely reported in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. There are no other potential pathways for combined effects.
Benthic Ecology / Fish and Shellfish Ecology /	These receptors are entirely marine and so there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the

Receptor groups	Potential for a project-wide (combined) effect
Marine Mammals	individual chapters as no potential pathway for combined effects exists.
Ornithology	Bird populations in the coastal environment can use both terrestrial and marine environments and both onshore and offshore schemes have the potential to impact the same population of a given species. **There is therefore a theoretical pathway between onshore and offshore sources of impact that could potentially result in combined effect on receptors within this receptor group.**
Marine Archaeology	These receptors are entirely marine and are assessed individual receptor basis, and so there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters.
Shipping and Navigation / Commercial Fisheries / Other Sea Users	These receptors are entirely marine and so there is no potential for the onshore and offshore schemes to result in a combined effect beyond those already assessed in the individual chapters as no potential pathway for combined effects exists.
Greenhouse Gas Emissions	The nature of GHGs is such that their impact on receptors (the global climate) is not affected by the location of their source. The GHG emissions assessment by its nature is a cumulative assessment and considers whether the Scheme would contribute significantly to emissions on a national level. Therefore, GHG emissions are assessed at a Project-wide level already within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** and are not assessed further in this chapter.

2.4.10 Table 2.3 demonstrates, that with the exception of designated sites and ornithology (bird populations) there are no shared coastal receptors between the Onshore and Offshore schemes. There is the potential that project-wide (combined) effects could occur where a coastal designated site (or related functionally linked land) or ornithology (bird populations), is impacted by both the Offshore Scheme and one (but unlikely both) of the Onshore Schemes. These potential effects are considered further below.

Project-wide (Combined) Effects across Onshore Schemes

2.4.11 Although geographically separated, there is a potential for the individual elements of the Kent Onshore Scheme and Suffolk Onshore Scheme to combine to generate new significant (project-wide) effects where terrestrial resources or receptors are present that can be regarded as of regional or national importance. Examples could include:

- Combined impacts of all elements of the project on a nationally important and threatened habitat (e.g. Ancient Woodland, important hedgerows, vegetated shingle habitats) leading to a new project-wide effect, because of the total habitat loss.
- Combined impacts of all elements of the project on important soil / agricultural resource (e.g. Best and Most Versatile land) leading to a new project-wide effect, as a result of the total land take.

- Combined impacts of Greenhouse Gas (GHG) emissions from all Schemes of the Proposed Project. However, the GHG emissions assessment by its nature is a cumulative assessment and considers whether the Scheme would contribute significantly to emissions on a national level. Therefore, GHG emissions are assessed at a Project-wide level already within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** and will not be assessed further in this chapter.

2.4.12 The geographic separation of the Kent and Suffolk schemes does however mean that these project elements are very unlikely to generate project-wide effects in most technical areas. Each terrestrial receptor group is reviewed in Table 2.4 below to consider the potential for a project-wide (combined) effect to occur across the two onshore schemes.

Table 2.4 Potential for project-wide (combined) effects between Kent Onshore / Suffolk Onshore schemes

Receptor groups	Potential for a project-wide (combined) effect.
Landscape elements	There are no well-defined landscape resources, e.g. LCAs, extending to the extent of both counties, and there is no intervisibility of the two Onshore scheme components. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Residential receptors / Communities / Human Health	There are no shared residential receptors or communities across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Commercial receptors	There are no shared commercial receptors across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Designated Sites	There are no shared designated sites across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Terrestrial and aquatic ecological receptors /	There are no shared ecological receptors or habitats across the Kent Onshore and Suffolk Onshore schemes. Although there are Important Hedgerows within the Suffolk Onshore Scheme boundary there are none in the Kent Onshore

Receptor groups	Potential for a project-wide (combined) effect.
Notable Habitats (terrestrial and aquatic)	Scheme boundary. Also, although there are regionally important populations of bats around both the Kent Onshore Scheme and Suffolk Onshore Scheme, these are distinct and separate populations. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Designated heritage assets / Non-designated heritage assets	There are no shared heritage assets across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Water resources (existing abstractions and discharges) / Watercourses and waterbodies / Flood risk receptors / Groundwater	There are no shared water resources, water courses, groundwater resources or flood risk receptors across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Agricultural Land / Soil	There are no shared soil resources shared across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists. **There is a permanent loss of BMV in both Suffolk and Kent and there is therefore the potential for a combined effect across the two onshore schemes.**
Public rights of way / Cycle Routes / Roads	There are no shared Public rights of way Cycle Routes / Roads across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Onshore Geology	There are no shared geological resources across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no potential pathway for combined effects exists.
Ornithology	There are no shared bird populations across the Kent Onshore and Suffolk Onshore schemes. There is therefore no potential for the Kent Onshore and Suffolk Onshore schemes to result in a combined effect beyond those already

Receptor groups	Potential for a project-wide (combined) effect.
	proposed to be assessed in the individual chapters as no theoretical pathway exists.
Greenhouse Gas Emissions	The nature of GHGs is such that their impact on receptors (the global climate) is not affected by the location of their source. The GHG emissions assessment by its nature is a cumulative assessment and considers whether the Scheme would contribute significantly to emissions on a national level. Therefore, GHG emissions are assessed at a Project-wide level already within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** and are not assessed further in this chapter.

2.5 Assessment of Project-wide (Combined) Effects

2.5.1 The assessment of the project-wide (combined) effects of the Proposed Project described in this section considers the embedded, control and management measures, and mitigation measures identified within the technical assessment chapters: **Application Document 6.2.2.1** to **Application Document 6.2.2.13** for the Suffolk Onshore Scheme; **Application Document 6.2.3.1** to **Application Document 6.2.3.13** for the Kent Onshore Scheme; and **Application Document 6.2.4.1** to **Application Document 6.2.4.11** for the Offshore Scheme.

2.5.2 The assessment of the combined effects of the Proposed Project is presented in the following sections and is based on the review of the potential for such effects undertaken above:

- Project wide (combined) effects of the Suffolk Onshore Scheme and the Offshore Scheme where the schemes are likely to interact in the vicinity of the Suffolk landfall on the same receptor or resource (designated sites, ornithology);
- Project-wide (combined) effects of the Kent Onshore Scheme and the Offshore Scheme where the schemes are likely to interact in the vicinity of the Kent landfall on the same receptor or resource (designated sites, ornithology); and
- Project-wide (combined) effects of the Suffolk Onshore Scheme and Kent Onshore Scheme, where the schemes both impact the same national resource (no relevant topics / resources identified).

Project-wide (combined) effects of the Suffolk Onshore Scheme and Offshore Scheme

Step 1 screening, review and identification of shared receptors

2.5.3 Table 2.4 presents a screening of the receptors identified as having the potential for combined effects. The table summarises the receptors in the vicinity of the Suffolk Landfall to identify common receptor groups to both schemes.

Table 2.4 Step 1 Screening Suffolk Onshore Scheme and Offshore Scheme shared receptors within the vicinity of the Suffolk landfall.

Receptor	Suffolk Onshore Scheme	Offshore Scheme
Designated Sites	Sandlings Special Protection Area (SPA) Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) The Haven Local Nature Reserve (LNR)	Sandlings SPA Leiston-Aldeburgh SSSI Outer Thames Estuary SPA
Ornithology	Birds	Seabirds and waterbirds

2.5.4 Table 2.4 presents a screening of the receptors identified as having the potential for combined effects. The table summarises the receptors in the vicinity of the Suffolk Landfall to identify common receptor groups to both schemes.

2.5.5 Table 2.4 identifies the following receptors groups which may be impacted by both the Suffolk Onshore Scheme and the Offshore Scheme:

- Designated Sites; and
- Ornithology.

2.5.6 These receptor groups have been progressed for further assessment in Step 2.

Step 2 source-pathway-receptors identification

Designated Sites

2.5.7 Table 2.4 presents a screening of the receptors identified as having the potential for combined effects. The table summarises the receptors in the vicinity of the Suffolk Landfall to identify common receptor groups to both schemes.

2.5.8 Table 2.4 above identifies the following designated sites which have the potential to be impacted by both the Suffolk Onshore Scheme and Offshore Scheme due to their proximity to the Suffolk Landfall:

- Sandlings SPA;
- Leiston-Aldeburgh SSSI;
- Outer Thames Estuary SPA; and
- The Haven LNR.

2.5.9 Impacts likely to arise on these designated sites include loss of land and disturbance during construction. These sites are reviewed below.

2.5.10 Whilst several coastal designated sites (Leiston-Aldeburgh SSSI and The Haven LNR) do lie within the Suffolk Onshore Boundary and Offshore Boundary, these will be crossed using trenchless techniques and no land from the designated sites will be lost to the Proposed Project. There is provision for a monitoring access through Sandlings

SPA/Leiston-Aldeburgh SSSI but this will be using an existing access track. Therefore, the combination of Suffolk Onshore Scheme and Offshore Scheme boundaries will be Not Significant in relation to land lost from designated sites.

2.5.11 Sandlings SPA is designated for nightjar and woodlark. Surveys in 2023 and 2024 identified woodlark nesting outside of the SPA, though not within the Order limits of the Suffolk Onshore Scheme. The surveys indicate that arable and sandy soils in this area very quickly become suitable for woodlark, particularly when left fallow. Fields that were not fallow in 2023 did not support woodlark, while those same fields left fallow in 2024 did support woodlark due to the sandy soil and sparse vegetation. This illustrates that arable land in the area routinely moves in and out of suitability for woodlark as part of normal farming practice, and the Suffolk Onshore Scheme would not change this.

2.5.12 Approximately 2.5 ha of acid grassland would be temporarily lost adjacent to Sandlings SPA due to the trenchless construction compound (S10) and associated section of cable trench east of Leiston Road. This field showed no evidence of nightjar/woodlark nesting during the two seasons of breeding bird survey undertaken but is well within 1 km of the nearest woodlark territories in the SPA and adjacent to a field where the nearest woodlark territory outside the SPA was recorded. This loss of foraging habitat would last for a single nesting season.

2.5.13 There is a further area (totalling approximately 8 ha) of acid grassland north of the golf course that would be temporarily removed while it is traversed by the cable trench, although given the speed with which the trench could be installed (approximately 100 m to 300 m a week) any temporary loss at a given time would be minimal other than from the 7 m wide haul route. Moreover, that area became less suitable for nightjar and woodlark in late summer 2024 due to planting works undertaken by the golf course as part of their overall plans for golf course expansion.

2.5.14 Breeding bird surveys undertaken for the Proposed Project in 2023 and 2024 have shown that woodlark use land outside the SPA opportunistically. The 2024 surveys recorded that arable land on sandy soils that has been left fallow have been used for nesting by woodlark. This shows that habitat structure (i.e. short vegetation on sandy soils) is more important that actual botanical species composition. Therefore, the trenchless field is very likely to come back into use as foraging habitat in the next nesting season once works have ceased, without any lag time for acid grassland to re-establish.

2.5.15 Given the short duration of loss (it is assumed that compound S10 would be removed after a single nesting season) and the fact that the amount of habitat loss is a relatively small amount of the available foraging habitat in the area, it is considered that this is a minor adverse impact on a receptor of international importance leading to an effect that is Minor adverse and thus not significant.

2.5.16 However, aside from any value it may have for SPA birds, acid grassland is an important and scarce habitat. Therefore, as part of the broader habitat mitigation proposals (unrelated to HRA considerations) the Proposed Project would restore and enhance approximately 6 ha of acid grassland that would be managed in a favourable way for 10 years following creation, to offset the lag time in restoration of the existing acid grassland that can be expected once the compound and cable trench works are complete. This grassland is on suitably sandy soils adjacent to other blocks of acid grassland and is approximately 1.6 km from Sandlings SPA. A key part of management would be minimising use of pesticides and herbicides and avoiding liming. Measures may also involve localised scrub and bracken clearance where required, creation of brash piles as refuges for reptiles and habitat for invertebrates, increasing grazing

intensity if the vegetation is too dense, and reducing grazing intensity if it is too short. If there are bare areas, there would also be consideration of raking/light harrowing (e.g. 5-10 cm tilth) and then sowing with seed.

2.5.17 While not being specifically created for the purpose of providing foraging or nesting habitat for woodlark and nightjar associated with Sandlings SPA, the surveys undertaken for the Proposed Project, as well as published research, indicates that vegetation that is kept suitably short and open, particularly if bare areas are created within the sward, is likely to be used for foraging by both species and may be used for nesting by woodlark. This would be located within 2 km of the SPA and thus within the foraging range of SPA birds, and also within the foraging range of woodlark found outside the SPA boundary. This would therefore incidentally offset any effects from the temporary loss of acid grassland adjacent to Sandlings SPA. It is therefore concluded that no likely significant effect on Sandlings SPA due to loss of functionally-linked habitat will occur.

2.5.18 During pre-application discussions with Natural England and RSPB over the Proposed Project a 60 dB LAmax threshold for noise disturbance has been agreed. With this in mind, 60 dB LAmax contours, allowing for noise mitigation such as 2 m high close-board fencing, were calculated for all phases of construction. The mapping shows that with noise fencing around the perimeter of the works area, the 60-70 dB contour would cover the southernmost part of the Sandlings SPA but only during compound set-up, which would take approximately 1 month. The approximately 4-month trenchless bore itself would not result in the 60 dB contour straying into the SPA because of the distance from the SPA (approximately 40 m) and the use of close-board noise-fencing. This assessment is presented in full in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.

2.5.19 In two seasons of breeding bird survey, no SPA birds have been recorded nesting in the part of the SPA that would be subject to potentially disturbing noise levels during compound establishment. Moreover, 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. Trenchless compound (S10) set-up is programmed to occur outside the nesting season (February to August). Therefore, no mitigation is needed beyond standard noise fencing around the compound. The noise fence would also act as a visual screen, thus protecting birds in the SPA from visual disturbance. The fencing in this location would not interfere materially with sightlines and openness due to the dense woody vegetation along the former railway line and the SPA boundary. All the open sightlines are generally north of the trenchless compound (S10) field. This assessment is presented in full in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**. For full survey information refer to **Application Document 6.3.2.2.C ES Appendix 2.2.C Suffolk Breeding Bird Report**.

2.5.20 While the 60 dB contour overlaps with the SSSI outside the SPA slightly (just to the east of the railway line) and the bird surveys show that the very small part of the SSSI within the 60 dB contour supports ditch and reedbed breeding birds, e.g. reed warbler. However, during pre-application discussion, Natural England has indicated that whilst these species are part of the ‘lowland open waters and their margins’ breeding bird assemblage feature of the SSSI, given the size of the area affected, LAmax noise levels over 60 dB in this small area are unlikely to significantly affect the SSSI. It is also important to note that the 60 dB LAmax contour is the maximum noise level experienced during an activity, not the typical or average noise level, which is much

lower, and would therefore not be experienced continuously. This would be a minor adverse impact on a receptor of national importance (since the internationally important features have been discussed already) resulting in a minor adverse effect that is not significant. Moreover, the additional mitigation discussed above for the SPA would also reduce the impact on the SSSI by timing the most disturbing element of works outside the nesting season.

2.5.21 With mitigation, noise and visual disturbance for Sandlings SPA constitutes a negligible impact on a receptor of international importance, while that for Leiston-Aldeburgh SSSI/RSPB North Warren constitutes a minor adverse impact on a receptor of national importance, that results in a negligible effect that is not significant. Due to the physical distance between the nearest works of the Offshore Scheme and Sandlings SPA (approximately 1 km) there will be no potential for disturbance of the SPA from the Offshore Scheme. The Offshore Scheme will involve a trenchless installation receiving location, but this would be in the subtidal area and would only involve the presence of marine vessels; this would not cause material disturbance of the Leiston-Aldeburgh SSSI interest features on land.

2.5.22 The Suffolk Onshore Scheme will not have any effect on the Outer Thames Estuary SPA due to a combination of distance and the fact that the SPA is designated for its open water foraging habitat.

2.5.23 The combined effects of the designated sites from the Suffolk Onshore Scheme and Offshore Scheme are considered to be not significant in relation to either the loss of land or disturbance during construction.

2.5.24 Further assessment of the designated sites is provided within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitats Regulation Assessment Report** and the Offshore Scheme ornithology assessment in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology**.

Ornithology

2.5.25 The habitat in the vicinity of the Suffolk landfall, where effects of the Suffolk Onshore and Offshore Schemes have the potential to combine and create a greater impact, is known to support birds, including seabirds and waterbirds. Loss of habitat that may support birds in the vicinity of the Suffolk landfall, may impact on breeding birds, seabirds and water birds. The Suffolk Onshore Boundary and Offshore Boundary at the Suffolk Landfall will be crossed using trenchless techniques which will minimise habitat loss at the interface between these schemes. For the reasons provided above for the bird interest of Sandlings SPA, Leiston-Aldeburgh SSSI and Outer Thames Estuary SPA, there is considered to be no combined effects on ornithology from the Suffolk Onshore Scheme and the Offshore Scheme.

2.5.26 The Suffolk Onshore Scheme will involve the temporary loss of approximately 20 ha of arable field during construction of the HVDC and HVAC cables and through construction compounds and associated haul roads and store areas. There will also be approximately 10 ha of permanent habitat loss due to the footprints of the Saxmundham Converter Station and Friston Substation. These areas of arable land are of value to nesting skylark and (in smaller numbers) yellowhammer. The arable land is also of value to wintering birds such as linnet and lapwing, in addition to some localised but regular use by golden plover and curlew. Habitat loss of arable land is being addressed through the enhancement of 12 ha of arable land within the Order Limits for the forty-year lifetime of the Suffolk Onshore Scheme through the creation of skylark plots in

winter cereals and retention of winter stubble from spring cereals. Moreover, for a 10-year period an area of acid grassland would be managed in a way which would also benefit nesting skylarks and other ground-nesting species. In the long-term there will be a positive impact on ornithology opportunities in other habitat through the net creation of woodland, grassland and wetlands and hedgerows around the Saxmundham Converter Station and permanent access. These areas are remote from the Offshore Scheme and there is therefore no potential for combined effects between the Suffolk Onshore Scheme and the Offshore Scheme on inland terrestrial ornithological receptors.

2.5.27 The Offshore Scheme will traverse areas of value for breeding and non-breeding birds in the marine environment. Non -breeding birds within the Study Area include red-throated diver (*Gavia stellata*) while breeding birds of relevance include foraging Terns. Control and management measures and embedded and additional mitigation have been built into the Offshore Scheme to avoid and/or reduce impacts to ornithological receptors. For example, vessels will avoid areas where rafting birds sit, often in groups on the water, and areas with high densities of birds. Existing shipping lanes will be utilised for vessel transiting routes to avoid additional disturbance where possible. Furthermore, to avoid cumulative effects with other projects, the construction works at the landfalls will be timed to ensure the core overwintering period of the red-throated diver is avoided, in the months of January – March.

2.5.28 The potential impacts of the Offshore Scheme on ornithological receptors include direct disturbance and displacement of birds associated with sound, visual impacts and presence of vessels, and direct loss and disturbance of seabed habitat (including, associated prey) used by foraging seabirds and waterbirds. With the implementation of mitigation and control and management measures, the likely significance of effect on the receptors are all considered to be not significant. Moreover, these marine areas are remote from the Suffolk Onshore Scheme and there is therefore no potential for combined effects on marine ornithology. Further assessment of ornithology is provided within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and the Offshore Scheme ornithology assessment in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology**.

Summary of potential combined effects of the Suffolk Onshore and Offshore Schemes

Table 2.5 Summary of Suffolk Onshore Scheme and Offshore Scheme combined effects

Receptor	Summary of potential combined effects of the Suffolk Onshore and Offshore Schemes at the Suffolk Landfall
Designated Sites	**Not significant**
Ornithology	**Not significant**

Project-wide (Combined) effects of the Kent Onshore Scheme and Offshore Scheme

Step 1 Screening, review and identification of shared receptors

2.5.29 Table 2.6 presents a screening of the receptors identified as having the potential for combined effects. The table summarises the receptors in the vicinity of the Kent Landfall to identify common receptor groups to both schemes.

Table 2.6 Step 1 Screening of Kent Onshore Scheme and Offshore Scheme shared receptors within the vicinity of the Kent landfall

Receptor	Kent	Offshore
Designated Sites	Thanet Coast & Sandwich Bay SPA and Ramsar Thanet Coast Special Area of Conservation (SAC) Stodmarsh SPA/Ramsar Stodmarsh SAC Sandwich Bay to Hacklinge Marshes SSSI	Sandwich Bay to Hacklinge Marshes SSSI Thanet Coast & Sandwich Bay SPA and Ramsar Sandwich Bay SAC Thanet Coast Marine Conservation Zone
Ornithology	Birds	Seabirds and waterbirds

2.5.30 Table 2.6 identifies the following receptors groups which may be impacted by both the Kent Onshore Scheme and the Offshore Scheme

- Designated Sites; and
- Ornithology.

2.5.31 These receptor groups have been progressed for further assessment in Step 2.

Step 2 Source-pathway-receptors identification

Designated Sites

2.5.32 Table 2.4 presents a screening of the receptors identified as having the potential for combined effects. The table summarises the receptors in the vicinity of the Suffolk Landfall to identify common receptor groups to both schemes.

2.5.33 Table 2.4 above identifies the following shared receptors for designated sites which have the potential to be impacted by both the Kent Onshore Scheme and Offshore Scheme due to their proximity to the Kent Landfall:

- Thanet Coast & Sandwich Bay SPA and Ramsar;
- Thanet Coast SAC;
- Stodmarsh SPA/Ramsar;

- Stodmarsh SAC;
- Humber Estuary SAC;
- Sandwich Bay to Hacklinge Marshes SSSI; and
- Sandwich Bay SAC.

2.5.34 Impacts likely to arise on these designated sites include loss of land and disturbance during construction.

2.5.35 Whilst there are several coastal designated sites that technically lie within the Kent Onshore Boundary and Offshore Boundary these will all be crossed using trenchless techniques and no land from these sites will be lost at the Kent landfall. For the Offshore Scheme there will be a jack up barge or similar in the intertidal mudflats within Pegwell Bay (part of Sandwich Bay SAC, Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay to Hacklinge Marshes SSSI) but the cable will be buried, and the mudflat will accrete resulting in no permanent habitat loss. Part of a belt of dense trees and scrub east of the railway line at Weather Lees Hill of Sandwich Bay to Hacklinge Marshes SSSI lies within the proposed Kent Onshore Scheme. However, the only works required in this area will be some pruning of trees to reduce height. No habitat removal will be required.

2.5.36 There will be permanent loss of functionally-linked land used by non-breeding golden plovers (an interest feature of Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay to Hacklinge Marshes SSS) for the Minster Converter Station and Substation as part of the Kent Onshore Scheme. However, this will be addressed through enhancement of off-site arable land for wintering golden plover. Since there is no permanent loss of habitat for golden plovers due to the Offshore Scheme there is no potential for combined effects.

2.5.37 Construction or decommissioning may result in the disturbance of designated sites; however, measures outlined in the Outline Code of Construction Practice (CoCP) (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**) such as GG03 (The CEMP shall include measures to manage dust, waste, water, noise, vibration and soil during construction), GG04 (a qualified and experienced Environmental Clerk of Works (ECoW) will be available), GG05 (Construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the project), GG08 (Where sensitive features are willto be be retained within or immediately adjacent to the draft Order Limits, an appropriate protective area will be established using appropriate fencing and signage), and GG21 (Construction lighting will be of the lowest levels necessary to safely perform each task) will help to manage any impacts.

2.5.38 Moreover, the Kent Onshore Scheme includes mitigation measures such as seasonal restrictions on some aspects of works (notably the site preparation, earthworks, and foundation creation for the Minster Converter Station and Substation, and the section of permanent access north of the SSSI) and the inclusion of noise fencing, to ensure the impact is not significant. See **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for details. The Offshore Scheme will involve works within Pegwell Bay as discussed, but these are approximately 1 km from the nearest Kent Onshore Scheme works (the trenchless installation drive) and there is therefore no potential for combined effects. Golder plover may be present in the intertidal zone though surveys indicate they would only be present in important concentrations in December (**Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology**). The indicative programme suggests that the marine HDD works at the

Kent landfall would be undertaken in the months May to September in 2026 and 2027 and as such there is no potential for combined effects of the Kent onshore and the offshore scheme.

2.5.39 The combined effects of the designated sites from the Kent Onshore Scheme and Offshore Scheme are not considered to be significant in relation to the loss of land and disturbance during construction due to both the design of the Proposed Project and the appropriate control measures that will be in place.

2.5.40 Further assessment of the designated sites is provided within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**, **Application Document 6.6 Habitats Regulation Assessment Report** and the Offshore Scheme ornithology assessment in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology**.

Ornithology

2.5.41 The onshore habitat around the Kent Onshore Scheme that is known to support key bird species is focused further inland around Minster Substation and Minster Converter Station. The value of the Minster Converter Station and Substation site for non-breeding golden plover has already been discussed. In addition, non-breeding hen harrier, marsh harrier, skylark and lapwing were recorded using the inland survey area in occasionally notable numbers, either for foraging or resting. They were generally focused on the River Stour or the fields immediately adjacent.

2.5.42 Birds and other fauna using the habitats within the Kent Onshore Scheme and surrounding area are sensitive to noise and visual disturbance during construction or decommissioning. Disturbance is likely to arise throughout the construction or decommissioning period. However, the Kent Onshore Scheme includes a range of mitigation measures (as identified in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**) to ensure this is not significant. Moreover, due to the physical separation between the Kent Onshore Scheme and the Offshore Scheme there is no potential for combined effects.

2.5.43 The Offshore Scheme directly passes through sites that are designated nationally or internationally for the protection of seabirds and waterbirds. These include Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar, Sandwich and Pegwell Bay National Nature Reserve (NNR), and Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI).

2.5.44 The breeding season for seabirds varies between species but broadly extends between April and August, with the core breeding period between May and July, during which time their distribution offshore is constrained by the need to return to their breeding sites.

2.5.45 Control and management measures and embedded and additional mitigation have been built into the Offshore Scheme to avoid and/or reduce impacts to ornithological receptors. For example, vessels will avoid rafting birds (where birds sit, often in groups, on the water) and areas with high densities of birds. In addition, existing shipping lanes will be used for vessel transiting routes to avoid additional disturbance.

2.5.46 The potential impacts of the Offshore Scheme on ornithological receptors include direct disturbance and displacement of birds associated with sound, visual impacts and presence of vessels, and direct loss and disturbance of seabed habitat (including, associated prey) used by foraging seabirds and waterbirds. With the implementation of

mitigation and control and management measures, the preliminary likely significance of effect on the receptors are all considered to be not significant for the Proposed Project.

2.5.47 Overall the potential for combined projects effects on ornithology are therefore considered to not be significant.

2.5.48 The combined effects on intertidal habitat arising from the Kent Onshore Scheme and Offshore Scheme collectively are considered not to be significant.

Summary of potential combined effects of the Suffolk Onshore and Offshore Schemes

Table 2.7 Summary of Suffolk Onshore Scheme and Offshore Scheme combined effects

Receptor	Summary of potential combined effects of the Kent Onshore and Offshore Schemes at the Suffolk Landfall
Designated Sites	**Not significant**
Ornithology	**Not significant**

Project-wide (combined) effects of the Suffolk Onshore Scheme and Kent Onshore Scheme

2.5.49 The only shared receptor across the two onshore schemes is the permanent loss of BMV land, as there are losses in both Suffolk and Kent.

2.5.50 The Institute of Environmental Management & Assessment has published a methodology for the assessment of cumulative effects on agricultural land, including BMV, in its report entitled "A New Perspective on Land and Soil in Environmental Impact Assessment" (IEMA, 2022), though it was acknowledged to be a work in progress.

2.5.51 The guidance suggests an approach based on the percentage of land lost within a five year period, focusing on changes to the rate of loss rather than just the loss itself. It suggests that "*For undeveloped land, a contribution of more than say 1% of the 5-year average land loss could be deemed potentially significant at a national scale, but because the loss of land cannot be mitigated, it is the rate of change in this figure that is significant*. The guidance acknowledges, however, that "*determining the rate of change requires the comparison of a rolling sequence of 5-year averages, and this database is not yet available*".

2.5.52 In the absence of this data a simpler approach can be taken, which is to identify the proportionate loss of agricultural land and BMV compared to the total present in the district. In a worked example of agricultural land loss at a local level, the guidance states that where "*The agricultural land loss exceeds 1% of the total*…[the loss]…*could be deemed significant*".

2.5.53 Information on land use in England is available in the form of an interactive dashboard produced by the Ministry of Housing, Communities & Local Government (MHCLG,

2018). Based upon this this information it can be determined that there are 62,964 ha of agricultural land in the Suffolk Coastal district, and 5,398 ha in the district of Thanet. The MHCLG data does not include the extent of BMV present within districts; however, the IEMA guidance suggests that approximately 42% of agricultural land is likely to be BMV. Applying this approximate percentage to the areas of agricultural land in the Suffolk Coastal and Thanet districts indicates areas of BMV of 26,445 ha and 2,267 ha respectively. ALC mapping indicates that both Suffolk and Kent have a higher than average amount of BMV; given that the assessment approach considers the proportion of BMV lost in a district, this means that an assessment based upon an assumption of 42% of land being BMV, in areas where the percentage of BMV is likely higher, will overestimate the proportional loss.

2.5.54 The area of permanent BMV loss as a result of the Suffolk Onshore Scheme is approximately 11.45 ha and the loss as a result of the Kent Onshore Scheme is approximately 12.21 ha. The following table sets out the individual and combined agricultural land and indicative BMV losses over the Suffolk Coastal and Thanet districts in terms of both total hectarage, and as a proportion of the total agricultural land and indicative BMV present.

Table 2.8 Combined Proportion of permanent BMV Loss in Suffolk Coastal and Thanet Districts

District	Agricultural Land (ha)	Potential BMV (ha)	Permanent loss to Proposed Project (ha)	% of all agricultural land in district	% of BMV land in district	Significant? (above 1%)
Suffolk Coastal	62,964	26,445	11.45	0.02%	0.04%	**No**
Thanet	5,398	2,267	12.21	0.23%	0.54%	**No**
Combined Effect	68,362	28,712	23.66	0.03%	0.08%	**No**

2.5.55 Based on the above calculations the effect of permanent BMV loss as a result of the Suffolk Onshore Scheme and Kent Onshore Scheme combined is considered to be **not significant**.

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