The Great Grid Upgrade

Sea Link

Sea Link

Volume 6: Environmental Statement

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Chapter 6 Appendix 1.6.A
Response to Scoping Opinion

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Contents

1.	**Response to Scoping Opinion**	**1**
1.1	Introduction	1
1.2	Aldeburgh Town Council	2
1.3	Aldringham-cum-Thorpe Parish Council	13
1.4	Anglian Water	19
1.5	Broads Authority	21
1.6	Canterbury City Council	21
1.7	The Coal Authority	21
1.8	Dover District Council	22
1.9	East of England Ambulance Service	25
1.10	East Suffolk Council	32
1.11	Environment Agency	56
1.12	Folkestone and Hythe District Council	59
1.13	Forestry Commission	60
1.14	Friston Parish Council	63
1.15	Great Yarmouth Borough Council	74
1.16	Historic England	75
1.17	JNCC	87
1.18	Kelsale-cum-Carlton Parish Council	88
1.19	Kent County Council	89
1.20	Leiston-cum-Sizewell Town Council	99
1.21	Marine Management Organisation	102
1.22	Maritime and Coastguard Agency	107
1.23	Ministry of Defence	110
1.24	Natural England	112
1.25	Network Rail	161
1.26	Office for Nuclear Regulation	163
1.27	Royal Mail	165
1.28	South Norfolk Council	167
1.29	Suffolk and North East Essex Integrated Care Board	168
1.30	Suffolk County Council	170
1.31	Surrey County Council	219
1.32	Thanet District Council	220
1.33	Theberton and Eastbridge Parish Council	223
1.34	UK Health Security Agency	232

1.35 London Borough of Bexley 235
1.36 Trinity House 236
1.37 National Highways 237
1.39 Eastern IFCA 238
1.41 Kent Wildlife Trust 241
1.43 JNCC 242

Table of Tables

Table 1.1 Aldeburgh Town Council 2
Table 1.2 Aldringham-cum-Thorpe Parish Council 13
Table 1.3 Anglian Water 19
Table 1.4 Broads Authority 21
Table 1.5 Canterbury City Council 21
Table 1.6 The Coal Authority 21
Table 1.7 Dover District Council 22
Table 1.8 East of England Ambulance Service 25
Table 1.9 East Suffolk Council 32
Table 1.10 Environment Agency 56
Table 1.11 Folkestone and Hythe District Council 59
Table 1.12 Forestry Commission 60
Table 1.13 Friston Parish Council 63
Table 1.14 Great Yarmouth Borough Council 74
Table 1.15 Historic England 75
Table 1.16 JNCC 87
Table 1.17 Kelsale-cum-Carlton Parish Council 88
Table 1.18 Kent County Council 89
Table 1.19 Leiston-cum-Sizewell Town Council 99
Table 1.20 Marine Management Organisation 102
Table 1.21 Maritime and Coastguard Agency 107
Table 1.22 Ministry of Defence 110
Table 1.23 Natural England 112
Table 1.24 Network Rail 161
Table 1.25 Office for Nuclear Regulation 163
Table 1.26 Royal Mail 165
Table 1.27 South Norfolk Council 167
Table 1.28 Suffolk and North East Essex Integrated Care Board 168
Table 1.29 Suffolk County Council 170
Table 1.30 Surrey County Council 219
Table 1.31 Thanet District Council 220
Table 1.32 Theberton and Eastbridge Parish Council 223
Table 1.33 UK Health Security Agency 232
Table 1.34 London Borough of Bexley 235
Table 1.35 Trinity House 236
Table 1.36 National Highways 237
Table 1.37 Eastern IFCA 238
Table 1.38 Trinity House 241
Table 1.39 JNCC 242

1. Response to Scoping Opinion

1.1 Introduction

1.1.1 A Scoping Report (**Application Document 6.14 Environmental Scoping Report 2022**) for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 and a Scoping Opinion was received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**). This appendix provides comment by comment responses to the feedback made by the prescribed consultees at scoping stage and how each comment has been considered. The responses to the Planning Inspectorate's core scoping opinion comments are excluded from this appendix as they are presented within each relevant technical environmental ES Chapter.

1.1.2 The scope and extent of the study area considered in the Scoping Report was sufficiently broad to accommodate the DCO Order Limits. Where methodologies have been updated since the Scoping Opinion was sought, for example due to changes in guidance or legislation, the most recent methodology has been implemented. More information on how the Applicant has responded to the Scoping Opinion is set out in each of the topic specific Chapters of the Environmental Statement.

1.1.3 Table 1.1 to Table 1.39 provide the Applicant's responses to each comment made by the prescribed consultees.

1.2 Aldeburgh Town Council

Table 1.1 Aldeburgh Town Council

Aldeburgh Town Council Comment	National Grid's Response
Introduction and project wide comments	
Aldeburgh is a coastal town in East Suffolk District council. It is bordered to the South by the River Alde, to the East by the North Sea. A large proportion of the town is in an AONB, with SSSI designated land, North Warren RSPB reserve/marshland and a local heritage Garratt Anderson Eraarea, as well as several areas in Flood Zones, and the land available for development is extremely limited. The economy of Aldeburgh is predominately tourism and retail/recreation & entertainment with a strong heritage in Music/the Arts and as an old fishing port (Slaughden).	Noted, no further response required.
The Town has its own Primary school, Community Hospital, GP Surgery, Library, Fire Station, RNLI Lifeboat station & Coastguard service with town allotments and recreational fields. A wide variation of independent shops, restaurants, pubs and hotels, independent Cinema and Bookshop, various community use spaces, a large second-home and formal and informal holiday let accommodation, along with a local resident population. Our road network is limited and we are actively exploring speed limits and parking strategies. Aldeburgh is famous and important within Suffolk as a year-long destination for day visitors and those staying, (as is the adjacent parish of Thorpeness and further up the coast Dunwich and Southwold – all areas to be impacted by various options of this project) with many festivals (documentary, poetry, theatre, music, food & drink etc) two yacht clubs, tennis courts and a golf course. The area is valued for its tranquillity, and preserved heritage (The Moot Hall a Tudor style Grade I listed building & award-winning Museum, and The Red House – home & archive centre of composer Benjamin Britten)	Noted, no further response required.
Aldeburgh Town Council and the residents it represents are supportive of renewable energy and off-shore wind generation in principle, but cannot support the proposed SeaLink project. We believe the main problems have resulted from the following; The fact that where the energy is generated is not where the energy is needed, yet NG have failed to maintain or expand the overhead network system to accommodate this transition. (NG themselves admit the overhead lines support the old coal fire station layout only). The offer of a connection in the 'Leiston area' onto the 400KV overhead lines should not have been made by NG if the powerlines are not able to transfer the energy to the South. It makes no sense and is not cost effective nor does the benefit outweigh the damage to the environment of bringing energy onshore on the Suffolk Coast and across to a new convertor station, new substation (Friston is still subject to JR) only to then send it back out to another new convertor station to a different new landfall out to a sea cable to Kent. Although the Developer says the cable would be two way they have confirmed verbally (evidence requested as yet received) that the majority of the flow will be from Suffolk to Kent where there is more demand. (In Suffolk the SZB nuclear power station has been and will be extended a further 35 years which is beyond the life-time of this project). If power is needed in Kent from the wind-farms off the East Coast a link should go direct from off-shore infrastructure. The SeaLink, EuroLink and Nautilus projects all propose to connect to the proposed new substation at Friston yet when consented by Sec of State this was only for SPR EA1N and EA2. The	For full details on the need for the Proposed Project please refer to **Application Document 6.2.1.1 Part 1 Chapter 1 Introduction** and **Application Document 7.1 Planning Statement and Application Document 4.2 Statement of Reasons** . The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.1 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.

Aldeburgh Town Council Comment	National Grid's Response
cumulative negative impact of these projects should require the original decision to be reconsidered as Developers are using the existence of this connection point/substation as the reason to justify locating projects here The Developer relies on the premise that the UK needs energy, and it's got to come ashore somewhere…we believe a pause should be imposed to enable better technology, true coordination and offshore infrastructure which would prevent negative impact to onshore areas, while still meeting net zero targets as the projects could then accelerate to completion with the right infrastructure. The EIA has failed to adequately consider the above factors in the evolution of the Suffolk Onshore Scheme.	
Co-ordination versus co-location	
Throughout the EIA the Developer has stated that they are looking to coordinate landfall, cable runs, convertor stations because SCC, ES and other consultees have requested co-ordination (2.1.8.1). Yes, we have asked for strategic coordination on brown field sites, which would remove the need to duplicate or triplicate infrastructure…but all they are proposing is co-location of three sets of cable runs, and to site three convertor stations in the same place with very limited reduction on land take footprint or negative impact. This is not co-ordination. And more dangerously this precedent has now produced 'emerging preferred options' - with landfall area A2 the only one capable of taking three sets of cable runs. We also object to the questions put by the Developer in their consultations when asking if respondents want 'co ordination'…which of course they will respond positively to. But again this is not true co-ordination where infrastructure would be shared and therefore land take minimized, it is co-location.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Value and protection of SSSI, AONB	
We believe the value of SSSI, RSPB reserve land and areas without infrastructure has been minimized throughout the EIA by the Developer who has not included their true worth as vital elements of our economy as a tourism destination, and as a place of tranquillity which contributes towards physical well-being and mental health. For example, in their assumption that it is acceptable to consider potential landfall at S2 because although it "interacts with the Leiston to Aldeburgh SSSI and North Warren RSPB reserve but has minimal constraints on the marine approach and is not constrained by the presence of any other existing or proposed infrastructure." (Vol 1 Part 2. 2.1.8.14)	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 7: Baseline Conditions identifies recreational assets within, and up to 500m radius from the Suffolk Onshore Boundary. 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits, based on the Design Manuel for Roads and Bridges (DMRB) LA 112 guidance. The assessment of effect on tourism and recreation assets is included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. An assessment of impacts on people's health and wellbeing is set out in the assessment of Impacts and Likely Significant Effects section of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**.
We would argue that areas where there is other infrastructure are less impacted by industrialization of this scale. The finding that there is no other infrastructure should not be a positive to encourage location. And although the marine approach will determine potential landfall – these features should not outweigh the potential damage and harm. Research shows that there are other locations for land fall which would not involve areas of outstanding natural beauty (AONB).	Noted, please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, **Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** which provides details on the alternative locations considered for the Proposed Project. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.

Aldeburgh Town Council Comment	National Grid's Response
The protection which should apply to Sites of Special Scientific Interest (SSSIs) is well documented in planning guidance. The following references are from EN1 National Policy Statement for Energy Infrastructure: 5.3.10 Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. All National Nature Reserves are notified as SSSIs. 5.3.11 Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. ATC do not accept that the benefits outweigh the impacts in our area as the SeaLink project could use a different technical model and different siting options while still meeting net zero targets and delivering energy to where it is needed.	The ecology impact assessment process has taken into account the high level of protection afforded to SSSIs and identified potential mitigation measures. These have been discussed with Natural England and are documented within the ES. EN1 National Policy Statement for Energy Infrastructure has been taken into consideration in each chapter of the Environmental Statement, including the Ecology and Biodiversity Chapter. For further detail regarding ecology, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
Development proposed within nationally designated landscapes	
5.9.9 National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas.	Landscape and Visual specialists have played a key role in the routeing and siting process to minimise potential effects on landscape and visual amenity. An assessment of the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB is included within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** which concludes that there would be no significant adverse effects at any project stage.
5.9.10 Nevertheless, the IPC may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: ● the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; ● the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.4; and ● any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	Noted, no further response required.
5.9.11 The IPC should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary	Noted, no further response required.
Developments outside nationally designated areas which might affect them	
5.9.12 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.	An assessment of the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB is included within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.

Aldeburgh Town Council Comment	National Grid's Response
ATC believe the proposals will have a negative impact both in and adjacent to the AONB. "Actions can be considered harmful to AONB if it results in the loss of, or material harm to any of the components of character that combine to form the area's natural beauty and/or its constraints, achievement of AONB Management Plan objectives." *Note – throughout the Scoping report the applicant says the impact is minimal. ATC believe in assessing the magnitude of harm that minimal is where the probability and magnitude of harm or discomfort anticipated in the proposed application is "not greater, in and of themselves, than those ordinarily encountered in daily lives of the general population."	The methodology for the Landscape and Visual Impact Assessment is set out within **Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology** which sets out the different levels of magnitude of impact. An assessment of the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB is included within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.
Landscape & Visual Impact Assessment	
In an AONB/SSSI the project will cause significant harm to the landscape and views enjoyed by residents and visitors, the basis for the economy (tourism, peace, tranquillity, artists/creatives etc)	An assessment of the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB is included within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment**.
EN1 offers guidance on the negative Visual impact (5.9.18) "All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project."	An assessment of the Suffolk Onshore Scheme on the visual receptors within the landscape and visual study area is included within **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**.
*Note: The difficulty with EN1 is that it does not include visual impact of all the onshore infrastructure as the policy is out of date and overdue for review, however the implication is clear. Consideration must be that the project can be delivered elsewhere without the same disbenefit. ATC believes the Developer cannot reduce impact at any of the proposed locations, it is possible to landscape but takes years to mature	An assessment of the Suffolk Onshore Scheme on the visual receptors within the landscape and visual study area is included within **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**. This includes reference to any differences in visual impact between year 1 of operation and year 15 of operation when landscape mitigation planting is considered to have matured.
Landscape reinstatement also is needed (landform & woodland screening, reinstatement of hedgerows and vegetation.) Developer proposes only a 5 year aftercare period.	Further detail on landscape reinstatement, including management and aftercare, can be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**.
EN1 National Policy Statement for Energy Infrastructure is clear with regard to loss of woodland: (5.3.14) "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided."	No ancient woodland will be impacted by the Proposed Project. Wherever possible veteran and ancient trees will be avoided. Please note, 15m Buffer Zones around both Ancient Woodland sites within Suffolk are shown on the Tree Constraints Plans and Tree Protection Plans. In addition, the root protection areas for all veteran and ancient trees have been increased to 15 times the stem diameter (measured at 1.5 m) or 5 m from the edge of the tree canopy (whichever is greatest) as per standing advice from Natural England and the Forestry Commission. Please refer to **Application Document 6.10 Arboricultural Impact Assessment**.
*Note the benefits of the development, in this location do not outweigh the loss of woodland habitat. Woodland in the Aldringham area (site of cable routes) is designated as 'ancient' on Natural England's Ancient Woodland inventory.	No ancient woodland will be impacted by the Proposed Project.
ATC would request that a full and detailed record kept of areas affected by an independent body with checks on visual resources after both during summer and winter. We note that various area have been given high or low sensitivity ratings by the Developer, but this remains a judgement and open to bias (should be done by independent body). Sensitivity of visual receptors is defined through appraisal of the viewing expectation or value placed on the view as identified in baseline study, and its susceptibility to change. Temporary impacts to the landscape will be major for a	Landscape and Visual Impact Assessment is a transparent and independent process. The landscape and visual impact assessment should be referred to within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** which considers all aspects of the Suffolk Onshore Scheme and the methodology contained within **Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology** which refers to how landscape and visual sensitivity has been determined. The oLEMP provides

Aldeburgh Town Council Comment	National Grid's Response
significant construction period. Visual impact should also be considered of traffic & welfare compounds, laydown areas etc.	mechanisms for monitoring the mitigation proposals, see **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**.
Ecology/Biodiversity	
The section (as with others) appears to be not the result of actual research, but more a list of possible research and hypothetical consequences. Difficult for Town/Parishes to comment. Developer claims they are aiming for a 10% increase in biodiversity by providing new habitats. Surveys would be necessary e.g. botanical, reptiles, great crested newts, badgers, woodlarks, nightjars.	Noted, no further response required.
Many places mentioned: Minsmere, Iken wood, Staverton Park, Sizewell marshes. Mention of Trenchless techniques without precise description or feasibility studies. Location of Convertor stations must be in brown field locations to minimize impact on habitats. More information including impact assessment needed.	Details of the Proposed Project design, including the details relating to trenchless techniques for the installation of cables is contained within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. A full environmental impact assessment has been undertaken and is presented within the Environmental Statement. For specific details on impacts to habitats please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
ATC does not believe that the Developer has adequately considered the impact of loss of green space footpaths and walking areas. EN1 guidance as follows: (5.10.2) The Government's policy is to ensure there is adequate provision of high-quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change.	An assessment of access to open space, leisure and play, and transport modes, access, connections and physical activity, is set out in the Assessment of Impacts and Likely Significant Effects section of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**. The assessment of effect on PRoW, community, recreation and tourism assets, including open space is included in the assessment within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project.
(5.10.24) Rights of way, National Trails and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders.	Noted, **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction process.
ATC considers these proposals will remove large section of the open green space used for walking, tranquil recreation and healthy well-bring. A significant number of Public Rights of Way (PRoW) will be temporarily stopped up or diverted or will be lost permanently. After construction those reinstated will still be negatively impacted by noise and light pollution due to their proximity to the proposed development. Industrialising large areas of agricultural land will also have a negative impact on climate change/CO2 whereas other potential sites including previously brown field are available.	An assessment of access to open space, leisure and play, and transport modes, access, connections and physical activity, is set out in the Assessment of Impacts and Likely Significant Effects section of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**. It is concluded that there are no anticipated significant health and wellbeing effects. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects does not identify any significant effects on open space used for recreational activities. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. No PRoW will be lost permanently. The quality of the agricultural land affected by the Proposed Project has been assessed and reported in the ES. Please refer to **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils**. An Outline Soil Management Plan has also been submitted, please refer to **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk.**

Aldeburgh Town Council Comment	National Grid's Response
	A lifecycle greenhouse gas assessment is included within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. This assessment has been conducted in accordance with the Institute of Environmental Management and Assessment (IEMA) good practice guidance for greenhouse gas assessments in Environmental Impact Assessments. The greenhouse gas assessment considers the mitigation measures embedded in the Proposed Project to reduce greenhouse gas emissions, as well as puts forward additional mitigation measures where applicable. More detail on the mitigation measures is provided in the greenhouse gas assessment. The Proposed Project has been designed to increase the capability of the network to carry low carbon and renewable energy from where it is generated to homes and businesses across the country. The Proposed Project will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets, but also deliver a more secure and resilient energy system. The implications of the Sea Link project on net zero targets is considered and discussed in more detail in the greenhouse gas assessment. **Application Document 7.5.13 Greenhouse Gas Reduction Strategy** has been developed alongside **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. This document sets out how greenhouse gas emissions will be managed across the project lifecycle and discusses decarbonisation opportunities.
Heritage	
A number of policy documents are noted, plus there is reference made to "Planning (Listed Buildings and Conservation Areas) Act 1990; and Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983and 2002). The developer themselves admits that "Effects to heritage assets may arise as a result of physical impacts to their fabric or through changes to their setting" as such this project is therefore harmful.	The full assessment of potential impacts that may result from the Suffolk Onshore Scheme is provided in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**. This has been informed by baseline studies and fieldwork, with the full details of these provided in the following appendices that support the ES chapter: **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report, Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers, Application Document 6.3.2.3.C Appendix 2.3.C Site Photos, Application Document 6.3.2.3.D, Application Document 6.3.2.3.E Aerial Photography and LiDAR Report** and **Application Document 6.3.2.3.F Archaeological Evaluation Trenching Report (Draft).**
Two Scheduled Monuments and seven Grade 11 listed buildings are in the scoping area, majority are outside or adjacent to the scoping area. The scoping document does list the various important sites and properties in the area and we would request that PINS takes this into serious consideration. The reputation for the whole area in terms of Heritage is crucial to the economy and well-being of residents.	The scoping area has been reduced as part of the development of the Suffolk Onshore Scheme, and as a result there are now no designated assets within the Order Limits. Potential significant permanent impacts on designed assets have been assessed as part of the Cultural Heritage assessment (see **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
EN1 guidance on Heritage and Historic assets confirms a presumption in favour of the conservation of designated heritage assets. (5.8.14) "Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional." The application proposal impacts several listed buildings which should be protected with the presumption in favour of conservation and we do not believe the EIA has given sufficient weight to this.	The scoping area has been reduced as part of the development of the Suffolk Onshore Scheme, and as a result there are now no designated assets within the Order Limits. Potential significant permanent impacts on designed assets have been assessed as part of the Cultural Heritage assessment (see **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Water Environment and impact on coastal communities	

Aldeburgh Town Council Comment	National Grid's Response
Concern regarding impact on coastal erosion, sea/river and fluvial flooding, drainage and the environmental effect of changes to the water table.	The potential impacts to coastal erosion for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**.
Storage of spoil could also lead to problems.	Storage of spoil within the floodplain would seek to be avoided where practical. Where this can not be avoided, any potential effects are assessed within **Application Document 6.8 Flood Risk Assessment**, and suitable mitigation of any detrimental effects is secured.
Developer aims to have the Convertor Stations above the flood-plain, but many options are in or close to flood zones.	The converter station site is located outside of fluvial and coastal flood zones. Where sites encroach into surface water flood zones, any effects are assessed within **Application Document 6.8 Flood Risk Assessment**.
All the proposed locations for landfall are in areas subject to coastal change. EN1 includes guidance on the Impact on Coastal communities (5.5.1) "The Government's aim is to ensure that our coastal communities continue to prosper and adapt to coastal change. This means planning should: ● ensure that policies and decisions in coastal areas are based on an understanding of coastal change over time; ● prevent new development from being put at risk from coastal change by (i) avoiding inappropriate development in areas that are vulnerable to coastal change or any development that adds to the impacts of physical changes to the coast, and (ii) directing development away from areas vulnerable to coastal change; ● ensure that the risk to development which is, exceptionally, necessary in coastal change areas because it requires a coastal location and provides substantial economic and social benefits to communities, is managed over its planned lifetime; and ● ensure that plans are in place to secure the long-term sustainability of coastal areas."	A full routing and siting exercise was conducted for the Proposed Project with the results presented in **Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** and summarised in **Application Document 6.2.1.1 Part 1 Introduction Chapter 3 Main Alternatives Considered**. Impacts to the coastal morphology in both Kent and Suffolk are presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. Existing Shoreline Management Plans and the future baseline have been considered as appropriate in this assessment.
There is no economic and social benefit to the local communities what so ever. A small % of jobs during construction could be local but unlikely as these are specific skills set. There is a small number of jobs in the Lowestoft area connected to the maintenance of off-shore wind farms. There is no social benefit and in fact there will be economic and social detriment. The development is not 'exceptionally necessary' as other locations exist which could provide a solution, especially if the wrong initial grid offer is challenged.	A complete assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. The chapter concludes that there are no anticipated adverse significant effects as a result of the Proposed Development. The Proposed Project will provide jobs during the construction phase some of which will be accessed by local people.
Geology and Hydrogeology	
Concern regarding the potential for geology and hydrogeology effects through excavation/disturbance of potentially contaminated soil, creation of pathways for contamination during piling or foundation excavation, and changes to groundwater levels and flow (e.g. through dewatering) and changes to ground water levels and flow. We would rely on expert advice and guidance from EA and others to fully understand the impact especially to the aquifer, water supply, receptors generally and in sensitive areas such as SSSIs.	The Environmental Statement includes a preliminary contamination risk assessment included within **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment**, that follows a stage approach as recommended in Land Contamination Risk Management. Localised Hydrogeological Risk Assessment will also be undertaken where required e.g. at any locations where dewatering that actively lowers the groundwater table is required.+L36 As discussed in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** the trenchless installation method is sufficiently deep that it will not affect surface hydrology in Leiston-Aldeburgh SSSI.
Agriculture and Soils	
Agriculture land survey would be needed. Avoid quality land 1,2,3a. Instead: 3b,4,5. Agriculture is an important element of our economy. Arable land and urban development need to be studied and the research shared with Town/Parish councils to enable response. Care of the soil needed, and must reinstate. Very limited communications currently with affected landowners. Impact assessment would be needed. Cliff areas are particular vulnerable.	The quality of the land affected by the project is assessed and presented in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils**. Due to Health & Safety limitations relating to potential UXO presence, land grade has been assessed in the ES through a predictive approach (following the methodology set out by the Welsh Government. Mitigation includes a commitment to having a Soil Management Plan in place (in line with published guidance from Defra) and **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk** has been submitted with the DCO.
Traffic and Transport	

Aldeburgh Town Council Comment	National Grid's Response
Concerns are primarily regarding navigating in and out of the wider area for residents and visitors. Details of volume of vehicles and routes are unknown (such as shift patterns, weekend working, whether projects will be concurrent or sequential in their construction.) Cumulative impact with proposed SZC project traffic in the same area. Impact of worker's vehicles (rat-runs and rat-parking). Vehicle compound areas and delivery of wide loads, and storage of large equipment. How will diversions and PROW be managed in real time and what notice/communications in advance. How will access be maintained for landowners and residents affected? Suffolk is limited in its transport network due to location of rivers, the coast. The project areas would be accessed via B roads, quiet lanes and areas of rurality often with no footpaths.	Noted. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network, with the mitigation identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk**. The assessment is based upon shift patterns and a complete cumulative assessment has been undertaken. This is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The proposals in relation to managing PRoW is set out within the **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** which provides details of PRoW closures and diversions.
Air Quality	
Developer states it the impacts of this project are likely to be below IAQM screening and monitoring levels, yet admits the volume of traffic required is unknown. All construction projects impact on air quality both from vehicle emissions, and equipment drilling disturbing the soil which could change depending on what time of year construction takes place. The areas proposed have very low baseline levels of pollution currently. We are not reassured that site management and inspections will prevent bad practise such as vehicle idling.	Traffic flows have been compared with the IAQM criteria and are summarised in **Application Document 6.3.2.7.H Appendix 2.7.H Preliminary Highway Impact Assessment**. Full details of traffic data are presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. This includes the assessment of air quality effects which includes consideration of emissions from NRMM. Construction dust mitigation measures are presented in **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan** as well as **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**. Consideration of mitigation measures needed during operation are provided in the ES.
Noise and Vibration.	
Developer says no residential areas implicated, but people travel to/from and through these proposed sites, and some residential properties are located close by. Locations of Grade listed buildings.	The impact of the Proposed Project on residential properties and the road network has been assessed within the Environmental Statement. The road network in Suffolk is assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. It is also worth noting that the impact of the Proposed Project on nearby residential properties and people in Suffolk has been undertaken within a variety of the environmental assessments contained within the DCO application. These include: **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**; **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**; **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**; **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**; and **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing.**
Wildlife would be impacted by Noise and Vibration.	Noted - this has been identified as an impact in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
The proposed converter station & sub-station not yet designed (p310) so it is impossible to judge.	Noted, further detail of the design is now available and contained within the DCO application. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Anti-vibration mountings will be used for transformers and cooling.	Operational plant will include anti-vibration measures, as required. For the assessment of potential vibration effects, please refer to **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**.

Aldeburgh Town Council Comment	National Grid's Response
Construction traffic will produce noise and there will be 'Broadband noise'.	Construction traffic noise has been assessed and presented in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**.
Vibration and risks to the shoreline, cliffs etc. are not adequately addressed. Developer claims vibration can be 'scoped out' and underground cables are silent. Would we request that noise is assessed in accordance with BS 5228-1, taking account of guidance. How does LOAL (Lowest Observed Effect Level) work with the Rochdale envelope approach of providing the worst-case scenario?	Construction noise and vibration has been assessed with reference to BS 5228 Parts 1 (Noise) and 2 (Vibration), as detailed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. LOAELs (and SOAELs) are thresholds at which adverse or significant adverse effects may occur. Predicted levels of noise and vibration are compared against the LOAEL and SOAEL thresholds in the determination of potential effects. Where applicable, the assessments take account of uncertainty, such as the limit of deviation, as described in the chapter.
The following quotes from EN1 enforce the negative impact that excessive noise can have wide ranging impacts on the quality of human life, health (for example owing to annoyance or sleep disturbance) and use and enjoyment of areas of value such as quiet places and areas with high landscape quality. (5.11.1) "The Government's policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to "noise" below apply equally to assessment of impacts of vibration. " And (5.11.2) "Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed by the IPC in accordance with the Biodiversity and Geological Conservation section of this NPS."	Noise and vibration impacts on humans, and vibration impacts on structures, are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. Noise and vibration impacts of ecological receptors are considered in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
ATC does not consider that the Developer has included in the EIA robust considerations of: ● the characteristics of the existing noise environment; ● a prediction of how the noise environment will change with the proposed development; ● in the shorter term such as during the construction period; ● in the longer term during the operating life of the infrastructure; ● at particular times of the day, evening and night as appropriate. The base noise level before these applications are proposed is extremely quiet compare to the choice of a more industrialized location, so therefore the negative impact and harm is greater.	Noise and vibration impacts are presented in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**.
Socioeconomics, Recreation and Tourism	
Construction activities would negatively impact on tourism and the day to day life of residents. Specifically from the noise and light pollution, traffic, construction of temporary compounds and haul roads	The impact on the community, tourism and recreation assets in Suffolk is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**. The impact of potential noise and vibration impacts from construction activities in Suffolk are considered in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. The impact of potential light pollution is considered in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. The impact of potential traffic impacts from construction activities are considered in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. For further details relating to the construction phase activities please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Proposed Project Description**.
Permanent impact of Converter Station and extended Friston Substation.	For details relating to the design of the Proposed Project, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The design presented within this chapter has been used to inform the assessment of environmental impacts which is presented within the Environmental Statement.

Aldeburgh Town Council Comment	National Grid's Response
Developer states that a contact number will be provided in case of excessive disturbance, we would note this is too late, and disturbance should be prevented by imposing limits or relocating project to an industrialized area where background levels for noise etc are higher.	Contractor contact details would be provided as part of good construction practice.
Impact on leisure (public rights of ways/footpaths and bridleways) business, recreational facilities, and residential properties will be significant. Access to year round festivals and events will be impacted.	A comprehensive assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects and concludes there are no significant socio-economic effects as a result of the Proposed Project. An assessment of access to open space, leisure and play, and transport modes, access, connections and physical activity, is set out in the Assessment of Impacts and Likely Significant Effects section of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**. It is concluded that there are no anticipated significant health and wellbeing effects. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project.
Developer states reduced impact will be achieved "through the use of best practice measures, including with regard to phasing of construction works and if necessary, providing diversions for users". Due to the scale of the project and the possible overlap with other projects during the same construction period ATC does not consider that it will be possible to divert users. Not clear if phasing will elongate time frames? Weekend, evening and bank holiday working should be excluded. Key tourism periods should be avoided, however significant funding has been spent to build this area into a 'year-round destination'…so how can this be adequately protected? There is no period of time that the roads in our area could be closed without causing disruption to our socioeconomics, recreation or tourism. Our network of roads is very limited, (only one road north direct to Thorpeness). All three exit roads from Aldeburgh will be impacted by SeaLink proposals. Any employment generated is temporary (unlikely to be local workers and we have a very low level of unemployment) and those taking accommodation would displace other visitors so not a net gain to the economy.	Noted. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network, with the mitigation identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan**. No road closures are planned as part of the proposals other than to accommodate abnormal loads or the construction of bellmouths if required. For further details, please refer to **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport**. A comprehensive assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects and concludes there are no significant socio-economic effects as a result of the Proposed Project. Impacts on roads will not lead to significant socio-economic effects, nor will accommodation taken by the local workforce.
ATC seeks reassurance that the Developer has adequately considered guidance from EN1 as follows	
5.12.2 Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2).	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 6: Study Area sets out that employment generation during the construction phase will be assessed within a 60 minute travel area, based on research by the Chartered Institute of Personnel and Development (CIPD). **Application Document 6.2.2.10Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 4: Approach and Methodology sets out the additionality assumptions applied to the assessment which have been informed by professional judgment and experience on comparable DCO schemes.
5.12.3 This assessment should consider all relevant socio-economic impacts, which may include: ● the creation of jobs and training opportunities; ● the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; ● effects on tourism; ● the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on	A comprehensive assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects and concludes no anticipated significant effects on tourism or from an influx of workers as a result of the Proposed Development. Additionally, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Inter-Project Cumulative Effects** assesses the impact of the Proposed Development in

Aldeburgh Town Council Comment	National Grid's Response
how populations and service provision change as a result of the development; and ● cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region	combination with a number of major infrastructure projects. It is concluded that there are no anticipated significant socioeconomic effects.
Health & Wellbeing	
Same impact as those in Tourism.	Noted, no further response required.
Potential temporary and permanent impacts on the quality of life and safety of local residents, visitors and workers arising from construction of the Suffolk Onshore Scheme related to air quality, noise, landscape amenity, traffic and transport, loss of community cohesion, reduction in house/land values in option areas.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** both consider: Access to healthcare services and other social infrastructure; Access to open space, leisure and play; Air quality; Noise and vibration; Transport modes, access, connections and physical activity; Employment and income; and Social cohesion and community identity. For further details of the assessment please refer to this chapter.
Stress and worry caused by a succession of energy projects/NSIP DCOs with limited support from District and County councils leaving Town/Parishes to engage and represent residents' views and concerns, means that significant damage has already been done to our communities. Individuals have lost their lives, their homes and their livelihoods due to the property blight and uncertainty.	This comment has been noted. **Application Document 6.2.2.10 Part 2 Chapter 10 Socio-economics, Recreation, and Tourism**, Section 10.9: Assessment of Impacts and Likely Significant Effects provides a comprehensive assessment of socio-economic effects. In addition, an assessment of health and wellbeing is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**.
Cumulative Effects	
The Developer refers to Intra and Inter project (2.13 and 2.14) Although listed (2.13.3) we do not believe that the Developer has effectively considered the cumulative impact of these. Stating that inter and intra cumulative effects are "proposed to be scoped into the EIA and the results will be presented in the Environmental Statement (ES). We believe more focus should be on the cumulative impact of these projects and this should dictate from the very beginning the connection offers made by NG, not piecemeal.	National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects has considered the combined impacts between the Proposed Project and with other proposed developments within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
We attach an artists' illustration set against OS map which evidences the potential cumulative impact of the proposed projects (SZC, EA1N, EA2, SeaLink, EuroLink)	Noted, potential cumulative impacts from other developments has now been fully assessed and considered within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**.
Other issues:	
ATC have primarily focussed on Vol 1 Part 2 Suffolk Onshore Scheme. We would also request that you research and seriously consider the impact on the Fishing industry at Aldeburgh and Sizewell.	Impacts to Commercial Fisheries are considered within **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries**.
We lack the expertise in many specific topics and as well as our own comments in this document, ATC supports representations from: SASES, SEAS, Aldringham cum Thorpeness Parish Council, Friston Parish Council, Snape Parish Council, East Coast Energy Alliance, Historic England, Natural England, RSPB Minsmere, Suffolk Coast and Heath AONB Partnership, Suffolk Preservation Society, Suffolk Wildlife Trust and The Woodland Trust.	Noted, no further response required.

1.3 Aldringham-cum-Thorpe Parish Council

Table 1.2 Aldringham-cum-Thorpe Parish Council

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
1 Introduction	
Aldringham-Cum-Thorpe Parish Council welcomes this opportunity to respond to National Grid's Sealink Interconnector Project to reinforce the energy network to meet the target set by Government of 50 gigawatts of offshore wind generation by 2030.	Noted, no further response required.
Aldringham-cum-Thorpe consists of the villages of Aldringham, Thorpeness and part of the hamlet of Sizewell	Noted, no further response required.
This document consists in the main of our comments on onshore aspects relevant to this Parish.	Noted, no further response required.
This response is not comprehensive and we reserve the right to comment further on all aspects including project scope as more information becomes available during the NSIP pre-application and application processes.	Noted, no further response required.
2 Local Context	
The local area that includes this Parish has already been heavily impacted by several other major Energy Infrastructure projects, including: · Nuclear Power Stations at Sizewell A and B · The proposed Sizewell C Nuclear Power Station · ScottishPower Renewables (SPR)'s East Anglia ONE Offshore (EA1N) and East Anglia TWO (EA2) Offshore Wind Farms (consented 2022) - two cable corridors would pass through centre of this Parish	Noted, the consideration of potential cumulative effects arising as a result of other proposed development within the cumulative study area has been assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**. The assessment of cumulative effects considers the information that is publicly available within the other proposed development supporting environmental assessments and determines whether additional mitigation is required beyond the mitigation outlined within the core environmental assessment for the Proposed Project. Energy projects or any other developments that have been built and are now operational at the time of the assessment have been assessed within the core assessments as they will form part of the baseline.
In addition to Sea Link, National Grid is also consulting on two additional projects: · National Grid Ventures' Continental Interconnector project Nautilus · National Grid Ventures' Continental Interconnector project Eurolink	Noted, although it should be clarified that these are separate projects and therefore will be assessed and determined separately within their respective planning applications. It should also be noted that where there is potential for significant cumulative effects to arise, these are assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** .
The Sealink scheme in Suffolk involves underground and subsea cables connecting the network between the 'Leiston area' and Kent via high voltage converter stations, an extension to the planned Friston substation and a cable connection to a landfall point where it transfers to a marine cable. This particular project is programmed to start towards the end of 2024 with the most disruptive works, i.e. the groundworks involved in laying the cable from landfall to the converter Station,	Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by the end of 2031 with reinstatement potentially continuing into 2032. Certain advance works (such as archaeological trial trenching or protected. An indicative construction programme for the Proposed Project and further detail relating to the construction

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
completed in the first two years. The construction of the station and the works to make the connection with the proposed Friston substation are targeted to finish around 2030.	phase of the Proposed Project is presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Aldringham-Cum-Thorpe Parish Council has issues regarding these latter works. At the time of writing, the status of the Friston Substation is still questionable. There is a Judicial Review over its proposed role and suitability. When Friston was initially planned, it was conceived as the Substation to make the connection to the national grid for the two Scottish Power Projects, EA1N and EA2. It would seem it is now planned to be augmented and transformed into an Energy Hub for other energy schemes such as Sea Link to connect with the Grid.	The proposed Friston Substation is located to the north of the village of Friston and to the south of the existing 4ZW and 4ZX overhead lines and cantered on Grid Reference TM4130961290 as illustrated on **Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk**. Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
There are other questions regarding the appropriateness of the site on six counts including flood risk and heritage, and that was before this project had its sights on their connection. We know that by the very nature of the Planning Process we must not comment here on other similar schemes. However, as was found in the Scottish Power hearings, the cumulative effects of a queue of up to ten Energy projects making their way across pristine Suffolk countryside must be taken into account. If there was ever a case of 'an elephant in the room', this is surely one of giant proportions. We will have already been living for several years of SPR's projects, before National Grid break ground in this area, with more to follow those. It must be also remembered that the £30 billion construction of Sizewell C Nuclear Power Station borders our Parish. Much of the land in Sizewell village south of Sizewell Gap lies within our parish.	Noted, the consideration of potential cumulative effects arising as a result of other proposed development within the cumulative study area in Suffolk has been assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The assessment of cumulative effects considers the information that is publicly available within the other proposed development supporting environmental assessments and determines whether additional mitigation is required beyond the mitigation outlined within the core environmental assessment for the Proposed Project. Energy projects or any other developments that have been built and are now operational at the time of the assessment have been assessed within the core assessments as they will form part of the baseline.
National Grid Ventures will be looking for similar works within their Eurolink and Nautilus projects, using routes from landfall to grid connection at Friston. If, as it appears, there is a certain inevitability of these schemes, then it would make sense that provision should be made for duct and cable laying to be undertaken for all three schemes at one operation. We have always argued for a co-ordinated approach and this should be a perfect opportunity. It does however leave us with a complex of three converter stations, measuring 750 metres by 150 metres by 30 metres high, squatting unceremoniously to the south-west of Knodishall. It would take some most ingenious architecture to blend and disguise this into the landscape.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
3 Project Scoping and Stakeholder Consultation	
We believe that commencement of a Sea Link non statutory Consultation and submission of this Scoping Report is premature, since: · The Sea Link Scoping Report assumes that connection connect to the National Grid would be made at Friston village. However, the creation of an energy hub and Grid connecting Substation at Friston village is subject to Judicial Review at the High Court. The final outcome of that has not yet been determined. · National Grid is bringing forward two other projects (Nautilus and Eurolink) within the same time scale. These are also at pre Application Stage. The developers claim they are being coordinated with Sea Link. They are both highly likely to impact scoping, including Sea Link's design and onshore site selection. There are clearly interdependencies between all three projects. · Renewables UK is working with National Grid, SSE Renewables and RWE Renewables UK with the intention of coordinating the design of North Falls and Five Estuaries Offshore wind farms with	It is noted that the Judicial Review was unsuccessful. Friston Substation benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. **Application Document 7.3 Design Development Report** provides information on how options were identified and selected for the Proposed Project, explaining how the Suffolk Onshore Scheme was arrived at.

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
one or more or all of Sea Link, Nautilus and EuroLink projects. A decision on this is not yet available and may impact Sea Link design in a major way. · In view of so many projects coming forward within the same timescale, all impacting the same approximately 4 square miles of the Suffolk's Heritage Coast and the communities therein, an overarching Energy programme for these separate but coordinated and interdependent NSIPs is essential before any individual project confirms its scope with PINS.	Details of how National Grid has coordinated the Proposed Project with other relevant proposed developments in the area is discussed in **Application Document 7.10 Coordination Document**. The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with other relevant proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Should the Development change substantially once a decision on whether and how to coordinate a common onshore design with North Falls, Five Estuaries, and Eurolink has been made, the Applicant must be required to request a new Scoping Opinion	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
National Grid is at present conducting concurrent consultations on: · Sea Link Scoping Report (25 Oct 2022 – 22 Nov 2022), · Sea Link non statutory consultation (25 Oct 2022 – 18 Dec 2022), · Eurolink non statutory consultation (25 Oct 2022 – 18 Dec 2022).	Noted, no further comment required.
In combination, these consultations are already imposing an unacceptable burden on the several onshore communities and councils, impacted by both projects. This is leading to confusion and consultation stress and fatigue. This situation is incomprehensible since PINS did advise the Sea Link project team on 20 June 2022 at a S51 meeting(a) to "at least wait for the Consultation period to close before submitting its scoping request".	Noted, no further comment required.
The scope of works are all similar in terms of the Construction works to what we have seen In SPR's previous projects with most items scoped in. There are some items that differ, notably working hours, which would look to include provision for 24/7 without requesting special notification. We understand a horizontal drilling element beneath the RSPB site at North Warren, such times would be permissible with the lower db level of sound. However without time limitations, a culture of permanent site occupancy prevails, where contractors suit themselves rather than the concerns of neighbouring parishioners and even with reduced noise levels there is light pollution at the work-face and the site compounds. Aldringham-cum-Thorpe Parish Council makes every effort to be a 'darkskies' council when assessing planning applications in this rural and wildlife rich area. It is also of great concern regarding the Converter station and the Substation at Friston, once they are operable, that lighting for maintenance and security will exude an aurora glowing behind the wooded shielding.	Since publication of the PEIR within statutory consultation, the proposed construction working hours have changed. The change of these hours has been consulted on as part of the targeted consultation. For details relating to the proposed construction working hours and any associated restrictions, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. During construction, a construction environmental management plan (CEMP) will be implemented and will ensure that impacts to local communities is mitigated where practicable. Within the DCO Application, **Application Document 7.5.3 Outline Onshore CEMP** and **Application Document 7.5.2 Offshore CEMP** have been produced. This includes **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (CoCP)** which includes measures to control lighting and noise.
There are other elements in the Scoping Report that have been scoped out but raise concerns. No plan is envisaged to deal with spillages of fuel and chemical works from those vessels and equipment involved in the maritime aspect of the project. Emphasis is purely that those vessels are licensed to carry out these works and bound by codes of conduct, but as we all know accidents happen. We feel that there should be some provision and policing of this element of construction.	Impacts on the marine environment from accidental spillages of fuels and chemicals are considered in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology**, **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish**, **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** and **Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology**.
We also note that there no specific plans within the project for engaging local labour from the East Suffolk locality. When asked about this at a local community consultation event, the Applicant's	Further details on the potential source of the workforce for both the construction and operational phases of the Proposed Project have emerged beyond the Scoping stage.

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
representative stated that temporary employment may be available during construction, but long term employment and training was unlikely. Perhaps there might be full time placements on the maintenance of the various substations, but in terms of training and well paid full time jobs, this is an opportunity missed.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** estimates that during the construction stage around 30% of the workforce would be sourced from the surrounding area, based on benchmarks against similar energy infrastructure schemes. The staff required during the construction of the proposed works would vary throughout time. It is anticipated that the peak workforce for the Suffolk Onshore Scheme would be approximately 327. Please also refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Proposed Project Description** for details relating to the Proposed Project construction methodology including construction workforce details.
We observe that that there is no indication of any sort of Construction Traffic Strategy or Plan in the document, or indeed that the Applicant has even established that access to construction sites would be feasible. That may be a consequence of the premature submission of the Consultation Report and Consultation material. We have not been able to see how construction and worker vehicles would access the alternative cable corridor routes and therefore It has not been possible for us to make a complete assessment of their relative merits and demerits.	The strategy for access and construction vehicle routing has been reviewed as part of the ES and is presented within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk**.
There is no information on day-to-day movement of materials for the ducting and cable installation, the machinery for the drilling machinery and also the major pieces of plant within the converter stations. There is no 'meat on the bone' here. Is this to be in place at the next consultation stage?	Details of the machinery and materials is set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk**.
4 Comments on Sea Link EIA Scoping Report (Main Text Parts 1 and 2)	
Comments in the following sections of this response focus primarily on scoping aspects directly or indirectly relating to the Parish of Aldringham-cum-Thorpe.	Noted, no further comment required.
4.1 Suffolk Onshore Scheme Scoping Boundary	
A fundamental concern is that the Applicant has omitted Aldringham-cum-Thorpe from its list of settlements adjacent to the Project Scoping Boundary (ref. Para 1.1.4.3 of EIA Scoping Report - Volume 1 - Part 1) although it is clearly illustrated as being so in Figure 1.1.2.	The omission of Aldringham-cum-Thorpe has been rectified and the settlements within Aldringham-cum-Thorpe have been referenced within the Environmental Statement.
A further concern is that 1.1.4.5 states that 'The Hundred River is crossed by the Scoping Boundary to the south of Aldringham. According to all maps of the parish it would cross at the North-South midpoint of Aldringham, cutting the village into two separate halves during construction phases.	All mapping has been amended to reflect the design post Statutory Consultation and is presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
4.2 The proposed Development	
The Applicant's Site and Cable Route Selection work already carried out has been useful in narrowing onshore scope to S1 and S3. We therefore are assuming all other sites are now out of scope.	Noted, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been considered within the Environmental Assessment.
We believe it is in the interest of the local communities that all three Converter Stations for these projects are located at the same place and as close together as is technically feasible. Similarly, the cable corridors for all three projects should share a common route. That is in order to mitigate the extent of impact on the East Suffolk Heritage Coast, its communities and Suffolk's tourist industry through inter alia: destruction of landscape construction activity noise during construction and operation phases disruption of local roads, light pollution	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
ecological harm damage to Suffolk's tourist economy.	
The Sea Link Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES) should not rely upon the ScottishPower Renewables EA1N and EA2 2018 Extended Phase 1 Habitat Surveys - Part 1 of 2(b). It contains important omissions and errors in its documentation of habitats in Aldringham Hundred River Hundred Special Landscape Area. We recommend an independent survey of the area of riparian meadow (alleged to be 'Wet Woodland') between Aldeburgh Road and The Hundred River and the water meadow east of the Hundred River.	The evolution of the Offshore Scheme is presented in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**. This provides a background to the routing for the Proposed Project.
The HVAC corridor and graduated swathe for 'Suffolk Site 1 alternative' and 'Suffolk Site 3 alternative (option 2)' would both pass through the centre of Aldringham.	Since submission of the EIA Scoping report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the Environmental Assessment.
We ask PINS to scope out those land areas within the parish that lie within the Sea Link proposed HVAC corridor 'Graduated Swathes' for Suffolk Site 1 alternative and Suffolk Site 3 alternative (option 2) that overlap the Cable Corridor Order Limits for the SPR EA1N or EA2 projects(c). Following planning consent in March 2022, we understand SPR has formal permission from the Secretary of State for its exclusive use of the whole width between the DCO Order Limits as certified within Part 2 of Schedule 17 of the EA1N and EA2 DCOs(d).	The Order Limits in Suffolk (also referred to as 'Suffolk Onshore Scheme Boundary') are illustrated on **Application Document 2.2.2 Suffolk Location Plan**. These Order Limits have evolved since the submission of the EIA Scoping Report, taking account of aspects such as land rights.
Although SPR may later microsite and reduce footprint in some places, at this stage there is no certainty that any areas of overlap will be available for Sea Link to use as a cable route. They may not even be available at the time when a Sea Link DCO planning application is submitted to PINS, especially in view of SPR project delivery delays. It would be misleading to all concerned to leave them within the scope of this EIA.	The Order Limits in Suffolk (also referred to as 'Suffolk Onshore Scheme Boundary') are illustrated on **Application Document 2.2.2 Suffolk Location Plan**. These Order Limits have evolved since the submission of the EIA Scoping Report, taking account of aspects such as land rights.
The Applicant has recognised some of the difficulties and disadvantages of Suffolk Site 1 alternative' and 'Suffolk Site 3 alternative (option 2) in EIA Scoping Report - Volume 1 – Main Text Part 1 1.3.4.47 and EIA Scoping Report - Volume 1 - Part 2 Main Text Suffolk Onshore Scheme 2.1.6.9 and 2.1.7.9.	Since submission of the EIA Scoping report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the Environmental Assessment.
There is an ecological 'pinch point' where the route crosses the Hundred River, the B1122 and the area of 'Priority Deciduous Woodland' to the south of Aldringham Court. Options in Aldringham at that pinch point will be further significantly further constrained owing to the cumulative impact of any additional cable installations in combination with those that will be imposed by the construction of two cable corridors for SPR October 2021 East Anglia ONE North and East Anglia TWO wind farm projects in the same location and that have already received Secretary of State consent. This is a sensitive area of Priority Woodland river valley and is also classified by ESC as Flood Risk 3b. The local authority considered potential impact here and feasibility in its response to the non statutory Nautilus Consultation 2021, stating that it "could not be satisfactorily mitigated and that there are other less constrained routes; that present here are particular ecological, landscape, heritage and residential amenity challenges at the pinch point and crossing of the Hundred River. Trenchless Cable Installation technologies such as HDD would be required in this locality, but this has not been demonstrated to be possible by other developers owing to the constrained width of the area available".	The Proposed Project, subject to the DCO application, does not cross in the location being referred to immediately to the south of Aldringham Court. It crosses the B1122 further south as illustrated on **Application Document 2.2.2 Suffolk Location Plan**. The Proposed Project is coordinating with other proposed large scale infrastructure projects in Suffolk, noting that other projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, refer to **Application Document 7.10 Coordination Document**. The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other relevant proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Please note that the Applicant has omitted to include East Anglia TWO project (already consented) in its 'zone of influence (ZOI) - Appendix 1.5.A Inter-Project Cumulative Effects Long List of other developments within the ZOI.	East Anglia TWO has now been considered within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.

Aldringham-cum-Thorpe Parish Council Comment	National Grid's Response
Re: Environmental Impact Assessment Scoping Report Volume 1 Main Text Part 2 Suffolk Onshore Scheme - Table 2.10.6 - Construction Noise effect levels at residential receptors Time Period: Local working hours should be those negotiated between ScottishPower Renewables (SPR) and the Local Authorities as specified in the DCO for EA1N and EA2 (i.e. not as specified in Table 2.10.6 which seems to imply the possibility of 24/7 working during Construction.	Since publication of the Scoping Report and the PEIR within statutory consultation, the proposed construction working hours have changed. The change of these hours has been consulted on as part of the targeted consultation. For details relating to the proposed construction working hours and any associated restrictions, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The contractor will be required to implement best practicable means to reduce the impacts of noise and vibration during construction for all works. However, the measures will be proportionate to the level of risk, with a greater focus on activities which are likely to cause the greatest impact. For further details please refer to **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**.

1.4 Anglian Water

Table 1.3 Anglian Water

Anglian Water Comment	National Grid's Response
Thank you for the opportunity to comment on the scoping report for the above project which is within Suffolk Coastal district	Noted, no further response required.
Anglian Water is the appointed sewerage undertaker for the site shown on Figure 1.1.2 in Volume 3 Figures. The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to wastewater and water recycling assets. With regard to potable water and water supply assets, although Anglian Water is not the statutory undertaker, we have assisted other national infrastructure projects (see Table 2.13.3) to seek to address water supply concerns, for example, during a project's construction phase. The water supply questions and the assessment of them are not though covered in this response. The promoter would be advised in liaison with the statutory water company to consider the Water Resources East draft Regional Plan which sets out the collective water companies position.	A full assessment of Designated Sites are presented in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone Assessment**.
The Scheme - Existing infrastructure	
There are significant existing Anglian Water water recycling and network assets which serve the Leiston, Thorpeness, Aldeburgh and Saxmundham communities and businesses. These assets are also impacted by Sizewell C, its construction and related grid connection projects. The assets include the network connecting to the Leiston Valley Road Wastewater Recycling Centre the Thorpeness to Aldeburgh rising main and its continuation along Leiston Lane. The project has started liaison with our Asset Diversions team, and we would urge that early consideration and assessment is given to minimising the need to disrupt or divert utility assets which has a carbon impact and increases the risk of service disruption. Maps of Anglian Water's assets are available to view at the following address: http:www.digat.co.uk/	Noted, continued dialogue on all these aspects is welcome. Draft Protective provisions text is being produced and will be shared for consideration by Anglian Water, wastewater services will be required for the substation and converter stations and applications for these will be processed. A statement of common ground will be produced based on the current Memorandum of Understanding to identify agreed mitigations. National Grid intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of the DCO and will maintain ongoing discussions with stakeholders where necessary.
We note that other than a reference to a legislation (2.5.2.3) and general control measures (2.5.5.8) the promoter does not refer to the wastewater network or capacity. Anglian Water would want to ensure the location and nature of these assets is identified, disruption minimised, and services protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure. This approach would accord with Code of Construction Practice approach (bullet 1 in 2.5.5.8).	A comprehensive review of the locations of utilities and assets associated with the wastewater network has been undertaken by the Project design team, with a view to minimising conflict between the Project design and these existing assets, seeking to avoid diversions in all cases that are practicable. Continued dialogue on all these aspects is welcome. Draft Protective provisions text is being produced and will be shared for consideration by Anglian Water, wastewater services will be required for the substation and converter stations and applications for these will be processed. A statement of common ground will be produced based on the current Memorandum of Understanding to identify agreed mitigations. National Grid intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of the DCO and will maintain ongoing discussions with stakeholders where necessary.
Anglian Water welcomes that the promoter proposes (2.5.5.3) to follow the drainage hierarchy including Sustainable Drainage Systems (SuDS). We support the use of SuDS, for example at the Suffolk Converter Station site (2.5.6.13). With reference to Table 2.5.2 Anglian Water would welcome confirmation that SuDS will be used for all of the project and that there will be no connection to the public sewer network for construction or for operations in relation to built assets surface water management, for example. This would then negate the need for the draft DCO Order	SUDS are proposed for drainage across all of the Proposed Project and it is confirmed that no connection to the public sewer network for discharge of surface water is being sought to serve the Proposed Project during its construction or operation.

Anglian Water Comment	National Grid's Response
to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers. Anglian Water would for the purposes of the surface water management then be able to concur with the proposal in the Scoping Report (Tables 2.5.3, 2.5.4. 2.5.5, 2.5.6) that the surface water drainage impacts may be scoped out.	
The Scoping Report refers to the use of trenchless methods (2.8.5.3). Anglian Water would ask that the following standoff distances are applied for working each side of the medial line of pipes. (a) 4 metres where the diameter of the pipe is less than 250 millimetres; (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.	National Grid will maintain ongoing dialogue with Statutory Undertakers, including Anglian Water, in order to understand asset interfaces. Draft Protective provisions text is being produced and will be shared for consideration by Anglian Water, wastewater services will be required for the substation and converter stations and applications for these will be processed. A statement of common ground will be produced based on the current Memorandum of Understanding to identify agreed mitigations. National Grid intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of the DCO and will maintain ongoing discussions with stakeholders where necessary.
The Construction Management Plan should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads. Further advice on minimising and then relocating Anglian Water existing assets can be obtained from: connections@anglianwater.co.uk	Specific easements will be utilised for third party utility assets within the converter station or substation boundary. Identification and discussion around such requirements for each asset will form part of National Grid's ongoing dialogue with each of the third-party utility providers.
A template set of Protective Provisions including the above will be sent to promoter with a view to establish the bespoke distances for any pipes that exceed 400 millimetres should design and route iteration prove unable to avoid work in the vicinity of Anglian Water pipes	Noted, no further response required.
New infrastructure	
We support the inclusion of water (2.3.5.4 and Table 2.3.3) including water use in the Code of Construction Practice and Construction Management Plan. Again, there is no reference to waste water connections for site operatives or activities. Anglian Water notes that the applicant has not sought to scope these matters out by providing sufficient information to reach a conclusion that the projects impact regarding wastewater, water recycling and water quality, are not significant.	Details of how waste water generated during construction of the Project would be managed are provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The effects of the Project on the water quality of water receptors and water resources is provided in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment**.
Engagement	
Anglian Water would welcome the progression of discussions with National Grid as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in delays to the project. We would recommend discussion on the following issues: 1. Impact of development on Anglian Water's 2. The design of the project to minimise interaction with Anglian Water assets and specifically to avoid the need for diversions which have carbon costs 3. Requirement for water recycling connections (if any) Confirmation of the project's cumulative impacts (if any) with Anglian Water projects 4. Draft Protective Provisions	Continued dialogue on all these aspects is welcome. Draft Protective provisions text is being produced and has been shared for consideration by Anglian Water taking into consideration the text provided by Anglian Water, wastewater services will be required for the substation and converter stations and applications for these will be processed. A statement of common ground will be produced based on the current Memorandum of Understanding to identify agreed mitigations. National Grid intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of the DCO and will maintain ongoing discussions with stakeholders where necessary.
Further advice wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at: planningliasion@anglianwater.co.uk	Noted, no further response required.

1.5 Broads Authority

Table 1.4 Broads Authority

Broads Authority Comment	National Grid's Response
I write further to the above proposal. I can confirm that the Broads Authority does not have any comments to make regarding this EIA scoping consultation.	Noted, no further response required.

1.6 Canterbury City Council

Table 1.5 Canterbury City Council

Canterbury City Council Comment	National Grid's Response
I am writing following the Planning Inspectorate's invitation to comment on information that should be provided in the Environmental Statement for the Sea Link project. I can confirm that we have no comments to make on what should be included as part of any forthcoming ES	Noted, no further response required.

1.7 The Coal Authority

Table 1.6 The Coal Authority

The Coal Authority Comment	National Grid's Response
Thank you for your notification of 25 October 2022 on what relevant matters should be 'Scoped In' to any forthcoming Environmental Statement for the above project.	Noted, no further response required.
I have reviewed the location plan against our coal mining information and can confirm that, whilst part of the project site (Ramsgate Area) falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority; meaning that there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability at the surface and / or a risk to public safety.	Noted, no further response required.
Accordingly, if you consider that the application is EIA development, there is no requirement for the applicant to consider coal mining legacy as part of their Environmental Impact Assessment.	Noted, no further response required.

1.8 Dover District Council

Table 1.7 Dover District Council

Dover District Council Comment	National Grid's Response
Relevant Planning Policies and Guidance	
Reference is made at Paragraphs 3.2.2.9 to 3.2.2.12 to Dover District Council Planning Policy. In relation to paragraph 3.2.2.10, the Regulation 19 Draft Local Plan was published on Friday 21st October 2022 and is a material consideration. The draft plan and evidence can be found at the following website address: https://www.doverdistrictlocalplan.co.uk/getinvolved	Noted, no further response required.
The following Policies are considered to be relevant: SP1 - Planning for Climate Change SP2 - Planning for Healthy and Inclusive Communities SP6 - Economic Growth SP11 - Infrastructure and Developer Contributions SP12 - Strategic Transport Infrastructure SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets SP14 - Enhancing Green Infrastructure and Biodiversity SP15 - Protecting the District's Historic Environment CC1 - Reducing Carbon Emissions CC2 - Sustainable Design and Construction CC3 - Renewable and Low Carbon Energy Development CC4 - Water Efficiency CC5 - Flood Risk CC6 - Surface Water Management CC7 - Coastal Change Management Areas CC8 - Tree Planting and Protection PM1 – Achieving High Quality Design, Place Making and the provision of Design Codes TI1 – Sustainable Transport and Travel TI2 – Transport Statements, Assessments and Travel Plans NE1 – Biodiversity Net Gain NE2 – Landscape Character and the Kent Downs AONB NE3 – Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy NE4 – Air Quality NE5 – Water Supply and Quality HE1 – Designated and Non-designated Heritage Assets HE3 - Archaeology	Noted, the environmental statement takes into consideration local and national planning policy and references these where relevant. Please refer to **Application Document 6.2.1.2 Part 1 Introduction Chapter 2 Regulatory and Planning Context** for further details.
Landscape and Visual	
The zone of theoretical visibility is based on the preference area for the converter station, set at a maximum height of 30m. This has informed the locations of the representative viewpoints which have been chosen; viewpoints 4, 6, 11, 12 and 13 are within the Dover District. These viewpoints are considered acceptable and will enable careful consideration of the wider landscape impacts of the proposals having regard for the Landscape Character Assessment.	Noted, no further response required.
Ecology and Biodiversity	
The proposed ecological surveys identified are considered to be acceptable, noting the comments below from Dover District Councils Senior Natural Environment Officer. It is requested that incidental	Beavers are included in the ES, as is incidental killing and injury. Please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.

Dover District Council Comment	National Grid's Response
mortality of riparian mammals is scoped into the EIA and that beavers are included as receptors identified in Table 3.3.4.	
Cultural Heritage	
The scope of the information to be included in the ES should enable adequate consideration of the impacts on archaeology (subject to consideration by KCC Archaeology), Listed Buildings and other designated and non-designated heritage assets in the surrounding area.	Noted, no further comment required.
Water Environment	
The scope of the information and flood risk assessment to be included in the ES is considered to be acceptable to enable review by KCC as Lead Local Flood Authority, Environment Agency and the IDB.	Noted, no further comment required.
Geology and Hydrogeology	
The scope of this assessment appears acceptable and would be informed by KCC in respect of waste and minerals and the Environment Agency in respect of ground water, given the location of source protection zones to the north and further south of the proposed swathes.	Noted, no further response required.
Agriculture and Soils	
The scope of the information to be included in the ES is considered to be acceptable.	Noted, no further response required.
Traffic and Transport	
The scope of this assessment is considered to be acceptable and will require engagement with the local highway authority (KCC).	Noted, no further response required.
Air Quality	
The scope of this part of the assessment is considered to be acceptable.	Noted, no further response required.
Noise and Vibration	
The scope of this part of the assessment is considered to be acceptable and no further information has been requested to be included by Dover District Council Environmental Protection Officers.	Noted, no further response required.
Socio-economics, Recreation and Tourism	
The effects on users of Public Rights of Way are included in the ES and a 500m buffer has been shown on figure 3.11.1. Due to the potential for long distance views across the Ash Levels towards the site, we consider that the visitor attraction of Richborough Castle should also be assessed in the ES.	A representative viewpoint has been included from the viewing platform at Richborough Fort as a basis for assessment within **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**. This includes reference to views across the Ash Levels towards the Suffolk Onshore Scheme and effects that the Suffolk Onshore Scheme would have on such views.
Health and Wellbeing	
The scope of this assessment is considered to be acceptable.	Noted, no further response required.
Cumulative Effects	
Paragraph 3.13.3.8 identifies that allocated sites in Local Plans or other Development Plans which were not yet subject to planning applications have also been identified on the long list. A number of sites are proposed for residential development as part of the housing allocation within the	A full inter-project cumulative effects assessment has been carried out for the Proposed Project. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of

Dover District Council Comment	National Grid's Response
Regulation 19 draft Local Plan. Several sites proposed as part of the Regulation 18 plan referred to in the scoping report have been removed and the list of sites will therefore need to be updated. The plan and list of sites can be found at the following website address: https://www.doverdistrictlocalplan.co.uk/get-involved	influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshre Scheme Inter-Project Cumulative Effects**. The Environmental Statement includes an updated description of other developments within **Application Document 6.3.2.13.A Appendix 2.13.A Descriptions of Other Developments .**This outlines the changes to construction timeframes of other projects.
Senior Natural Environment Officer:	
I am broadly satisfied with the proposed scope of the ecological aspects of the Sea Link project EIA (Kent Onshore Scheme). I am satisfied with the proposed suite of ecological surveys and advise that these must be undertaken by appropriately experienced ecologists in accordance with good practice methodologies (unless an alternative is adequately justified).	Noted, no further response required.
I note in table 3.3.7 that 'Incidental mortality of riparian mammals' is scoped out, but this contradicts the commentary in Table 3.3.4, which scopes this in in case the HDD and route selection cannot avoid suitable habitat. I advise that incidental mortality of riparian mammals is scoped into the EIA.	Incidental killing and injury is assessed in the ES. Please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
With respect to the Assessment Methodology, I advise that the proposed data sources (3.3.7.1) should include post-construction monitoring reports for the Nemo Link project, to ascertain how the habitats recovered.	Noted. However, there will be no loss of vegetated habitat in Thanet Coast & Sandwich Bay SPA due to the scheme as the site will be traversed using HDD.
I note that beavers are not specifically listed in Table 3.3.4, but this seems to just be an error rather than deliberate omission.	Beavers are included in the ecology chapter of the ES. Please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
Environmental Protection Officer:	
Environmental Protection have been invited to comment on the above submission. After reviewing the submission Environmental Protection have no comments on the information provided.	Noted, no further response required.
Summary	
This completes the formal scoping opinion of the Local Planning Authority at this stage. The "scoped in" potential effects identified in the scoping report are considered to be appropriate and additional "scoped out" potential effects identified above should be included in the ES to be submitted.	Noted, no further response required.
EIA is an iterative process and this formal scoping opinion does not preclude the Local Authority from requesting further information should it be necessary to fully and properly consider the proposal.	Noted, no further response required.

1.9 East of England Ambulance Service

Table 1.8 East of England Ambulance Service

East of England Ambulance Service Comment	National Grid's Response
We write in response to the Planning Inspectorate's letter dated 25th October 2022, inviting comment from consultation bodies and interested parties as to the information considered to be included within the Sea Link Environmental Statement	Noted, no further response required.
EEAST is an INTERESTED PARTY in this planning process and notes the timeline for submitting comments by 23:59 on 22nd November 2022.	Noted, no further response required.
NHS Suffolk and North East Essex Integrated Care Board and Suffolk County Council are aware we are submitting comments under separate cover.	Noted, no further response required.
EEAST has reviewed the Scoping Report documentation submitted by National Grid Electricity Transmission PLC (NGET) and a summary of the key areas for inclusion within the Environmental Statement (ES) from its operational perspective are set out overleaf: Suffolk Onshore Scheme & Offshore Scheme (Suffolk & Essex Coast) • Scoping Work – is required to determine a suitable study area, baseline assessment & approach to identify the likely effects (impacts) of the Project on EEAST's operations • Scheme Design, Mitigation & Management Measures - are required to avoid, reduce, mitigate & compensate for the likely Project impact on EEAST's operations during the construction phase of the development • Suitable DCO Requirements &/or Heads of Terms of Agreement, either via a Section 106 planning obligation or Deed of Obligation – are required to secure funding & new facilities provision, as required, to increase the capacity, response capability & Project Preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate & manage the impacts arising • Suitable Terms of Reference, Membership & a Communications Strategy for a Transport, Community Safety, Health & Wellbeing Working Group - are required to inform & assist the management of the construction, operational and decommissioning phases of the Project, requiring a coordinated response from EEAST along with its health & blue light partners, as well as organisations such as the Royal National Lifeboat Institution	The scope of the assessment is considered to be robust. Impacts on emergency services have been considered within the **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**. No significant effects have been identified. National Grid will seek to establish and maintain ongoing dialogue with EEAST and other blue light services as the Proposed Project progresses, in order to understand and seek resolution to any identified issues.
EEAST, together with the Suffolk and North East Essex (SNEE) Integrated Care Board (ICB), Suffolk Constabulary and Suffolk Fire & Rescue Service is therefore keen to work with NGET to address these points and agree and secure suitable mitigation and management measures either as a DCO Requirement and/ or a Section 106 planning obligation (or Deed of Obligation), at an early stage of the DCO process.	National Grid acknowledges these comments and welcomes the opportunity to engage with the EEAST and related bodies across the Proposed Project area. National Grid will use this engagement to ensure that matters of concern are identified and addressed.
If it is deemed that the matters raised by EEAST are more appropriately addressed by a supporting technical assessment to the ES, rather than as 'other effects' within the ES, then we would be agreeable to this.	The assessment identified no significant effects so no further assessment is deemed necessary.
East of England Ambulance Service NHS Trust	
EEAST is commissioned by NHS Suffolk and North East Essex Integrated Care Board (SNEE) on behalf of all ICB/ICSs to provide emergency and urgent care services throughout Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk, and transports patients to 17 acute hospitals amongst other healthcare settings, including within the Broadland DC, North Norfolk DC, Norwich CC and South Norfolk DC areas covering the location of the 'on – shore' Order Limits of the Sherringham & Dudgeon Scheme.	Noted, no further response required.

East of England Ambulance Service Comment	National Grid's Response
EEAST covers an area of approximately 7,500 sq miles with a resident population of over six million people and employs approximately 4,000 staff operating from 130 sites.	Noted, no further response required.
The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients: • Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2 • Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions • Patients may be passed to 999 via other NHS health care systems, including NHS 111 • EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.	Noted, no further response required.
EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.	Noted, no further response required.
Details of EEAST's service remit, priorities, staff, vehicle fleet and estate assets, service targets, co-working relationship with other healthcare and blue light partners, along with its operational standards and thresholds, are set out for information at Annex 1 & Annex 2.	Noted. No further response required.
Sea Link Project Proposals – Location & Overview	
The Project proposes to reinforce the transmission system in the South East and East Anglia	Noted, no further response required.
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 400kv overhead line close to Richborough in Kent.	Noted, no further response required.
The Project would comprise of the following elements; • Underground HVAC cable between the proposed Friston substation & a new converter station in Suffolk • New converter station in Suffolk • Underground HVDC cable between a new converter station in Suffolk & a landfall on the Suffolk coast, either between Aldeburgh & Thorpeness or at Sizewell Gap • Marine HVDC cable between a landfall on the Suffolk Coast & a landfall in Pegwell Bay in Kent • Underground HVDC cable between a landfall in Pegwell Bay & a new converter station in Kent • A HVAC connection (either by overhead line or underground cables) between a new converter station in Kent & the existing Canterbury to Richborough overhead line.	Noted, please refer to **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction** for an overview of the Proposed Project. For a more detailed description please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Construction Phase	
Subject to gaining development consent, construction works are expected to start in 2026 and be completed by 2030, with the Suffolk and Kent Onshore works and all Offshore works generally running concurrently.	Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by the end of 2031 with reinstatement potentially continuing into 2032. Certain advance works (such as archaeological trial trenching or protected species mitigation) may take place in advance of the main construction period. An indicative construction programme for the Proposed Project is presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
A construction workforce (at its peak) is likely to be in the order of 300 – 400 workers across the whole project.	The staff required during the construction of the proposed works would vary throughout time. It is anticipated that the peak workforce for the Suffolk Onshore Scheme would be approximately 327 which is expected to peak on 01 September 2026. The peak workforce in Kent would be approximately 231 which is anticipated to occur on the 25 April 2030. The peak Offshore Scheme

East of England Ambulance Service Comment	National Grid's Response
	workforce is expected to be 275. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The main construction activities are summarised below; Onshore including Landfall • Enabling works, including the widening of existing accesses & new accesses to the public highway, top soil stripping, formation of access tracks, watercourse culverting, drainage & construction works area fencing • Substation & Converter Station construction • Underground HVAC & HVDC cable trenching (up to 2km lengths for direct buried configuration & 200-300m lengths for cable ducting) & installation; • For constraint areas to be crossed using a trenchless method - pipe jacking/ auger bores, horizontal directional drill rig, tunnel boring machines to be employed • Barge mounted excavators for working in the inter-tidal zones in landfall locations Offshore Marine Cable • Marine pre-installation activities, including cable clearance, pre-sweeping, removal/ disposal of any unexploded ordinance • Marine HVDC cable installation – incorporating ground cable preparation & cable laying within the inter-tidal zones • Pre-lay seabed activities along the route • Installation & burial of subsea cables • Placement of external pipe protection, incorporating rock placement, concrete mattresses, rock/gravel/sand/grout bags or cast-iron shells • Vessel activities, incorporating cable lay vessels, cable burial vessels, guard vessels, support vessels, rock placement vessels & cable lay barges.	Noted, a more detailed and up to date description of the main construction works required are provided within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Operational Phase	
Once operational the Project Substations would be operated in line with NGET's usual procedures for operating all other Substations on the network.	Yes, the substations will be continuously monitored remotely by National Grid. For a description of the operational phase of the Proposed Development, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
For the Converter Stations, following a period of commissioning and testing they would operate continuously throughout the year with a minimum of two operators present at all times, and a maximum of six operators divided into three 8-hour shifts over a 24-hour period.	Following a period of commissioning and testing (as described above) the proposed converter stations would operate continuously throughout the year. Whether each end is (converting DC to AC) or (converting AC to DC) would depend on supply and demand on the transmission system. The proposed converter stations would be operated by a small team based on site. In general, a minimum of two operators would be present at all times. During normal operation there would be approximately six personnel on site, divided between three shifts over a 24-hour period. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
During operation the HVDC link and Marine Cable would transmit electricity from the proposed Friston substation to the existing network in Kent, or vice versa, depending on the supply & demand at the time.	Noted, for further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The Kent overhead HVAC connection would transmit electricity from the proposed Kent converter station onto the existing network in the South East of England.	Noted, for further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Planned and unplanned maintenance would be undertaken on an ongoing basis for the substations, with periodic surveys and inspections for all the other Project components.	Noted, for further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Decommissioning Phase	

East of England Ambulance Service Comment	National Grid's Response
The lifespan of substation equipment is approximately 40-years, and similarly for the converter stations, although interim plant replacement and refurbishment would extend the life.	Noted, for further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
For all the other Project components, if decommissioning is required, this would be undertaken in line with construction and waste management best practice applicable at the time.	Noted, for further details relating to the decommissioning phase please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The Suffolk Onshore scheme is located within the administrative boundary of Suffolk County Council and East Suffolk Council local authority areas, and the Kent Onshore scheme is located within the administrative boundary of Kent County Council and Thanet District Council and Dover District Council.	Noted, no further response required.
The Offshore scheme is located wholly within English Territorial Waters, and within the East Inshore and South East Inshore Marine Plan Areas. The Project Scoping Boundary crosses the Suffolk Coastal Waters, East Anglian Shipping Waters, Eastern English Channel Approaches and the Goodwin Sands and North Dover Strait Marine Character Areas	Noted, for further details relating to the offshore aspects of the Proposed Project please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The principal areas of geographical interest likely to affect EEAST's operations (working in partnership with its health and blue light partners, including the Royal National Lifeboat Institution, therefore relate to the Onshore components of the Project within East Suffolk District and the Offshore components within the East Inshore Marine Plan area, along with a further section of inshore waters running south of Felixstowe to the mouth of the River Thames	This comment has been noted. No further response required.
Project Environmental & Social Effects	
Review of the NGET EIA Scoping Report documentation indicates that the Project's potential effects (impacts) on EEAST's operational capacity, efficiency and resources (namely staff, vehicle fleet and estate assets) are not included – they are not therefore currently proposed to be baselined or assessed, and no potential mitigation parameters are outlined.	The assessment identified no significant effects so no further assessment is deemed necessary.
EEAST therefore request that the NGET EIA scoping process (and/or an accompanying technical assessment) be undertaken to determine the likely Project effects (impacts) on EEAST, and we are keen to work with NGET to ensure this omission is addressed by information being prepared to inform a robust DCO Application for examination.	The assessment identified no significant effects so no further assessment is deemed necessary.
This approach would assist the DCO process, and looking ahead, EEAST wish to agree and secure suitable mitigation and management measures as part of the DCO Requirements and/ or via a Section 106 planning obligation (or Deed of Obligation) and reflect this position in advance of the Examination.	The assessment identified no significant effects so no further assessment is deemed necessary.
Information for Inclusion Within Scope of the Environmental Statement &/or within a Technical Assessment with Related Mitigation & Management Measures	
Information for Inclusion Within Scope of the Environmental Statement &/or within a Technical Assessment with Related Mitigation & Management Measures	The assessment identified no significant effects so no further assessment is deemed necessary.
Highways, Traffic, Transport & Articulated Indivisible Loads (AIL's)	
It is evident that a major level of onshore construction works incorporating cable corridors, trenchless crossings, haul roads and works compounds, potentially requiring road closures and route diversions - along with the potential for significant HGV (and an unspecified number of additional/ AIL led) traffic movements are envisaged.	Details of road closures and diversions are indicated within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
This would take place as part of an extensive 4-year construction phase program, required to implement the Sea Link Project.	Noted, no further response required.

East of England Ambulance Service Comment	National Grid's Response
Information to determine the effects arising from the construction phase of the Project and the likely impact on EEAST's operational capacity, efficiency and resources (including the likely highway disruption and delay) and any related mitigation measures, therefore need to be included within the scope of the ES and/ or within technical work accompanying an application for a DCO.	Noted. The ES Traffic and Transport chapter demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network, with the mitigation identified within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
Once this information is presented and assessed, any necessary mitigation and management measures ought to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	The assessment identified no significant effects so no further assessment is deemed necessary.
Major Accidents & Disasters	
It is evident that a significant level and duration of construction phase work reliant on the use of sea-based construction vessels, heavy lift plant and specialist machinery/ equipment, producing noise, heat, vibration and dust (with work carried out during potentially adverse weather conditions) is likely to present construction site hazards and dangers both at sea and on land.	**Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan** and **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan** have been produced as part of this DCO application. These also outline the health and safety procedures which should be followed by contractors during construction.
Working at sea, and on coastal, cliff edge and uneven ground, with moving machinery lifting and transporting materials, and working at depth, including the potential for trench collapse, for example, underlines the risks associated with the construction related activities – requiring both urgent and other medical interventions and transport conveyance (including specialised airborne tasking/ conveyance) to be appropriately planned for and provided.	**Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan** and **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan** have been produced as part of this DCO application. These also outline the health and safety procedures which should be followed by contractors during construction.
Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate.	Noted, no further comment required.
Information to determine the effect of the construction phase and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA Scoping Report, along with any potential mitigation measure parameters.	Noted. Please refer to **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan** which provides details relating to the incident procedure and response. It should be noted that in advance of construction, contractors will develop and implement an Incident Response Plan which will detail their response in the event of any incident on site. As detailed within **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan**, National Grid are committed to ensuring the health and safety of persons working on projects is maintained in accordance with the Construction (Design and Management) Regulations 2015 (CDM) and the principles and philosophy behind them. The contractors will prepare a construction phase Safety Health and Environment (SHE) Plan prior to construction works commencing. A construction phase SHE Plan will be prepared by the contractors for each element of the Proposed Project. The assessment identified no significant effects so no further assessment is deemed necessary.
In the event of a construction phase accident, on land or at sea, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting.	Noted. Please refer to **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan** which provides details relating to the incident procedure and response. It should be noted that in advance of construction, contractors will develop and implement an Incident Response Plan which will detail their response in the event of any incident on site. As detailed within **Application Document 7.5.3 Onshore Construction Environmental Management Plan**, National Grid are committed to ensuring the health and safety of persons working on projects is maintained in accordance with the Construction (Design and Management) Regulations 2015 (CDM) and the principles and philosophy behind them. The contractors will

East of England Ambulance Service Comment	National Grid's Response
	prepare a construction phase Safety Health and Environment (SHE) Plan prior to construction works commencing. A construction phase SHE Plan will be prepared by the contractors for each element of the Proposed Project.
The processes and procedures developed by NGET, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on NGET to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews.	This comment has been noted. National Grid will prepare emergency response plans which cover a range of scenarios for getting the most appropriate assistance to any injured party. This will involve identifying routes and methods for getting any injured parties directly to an accident and emergency hospital or to a place of normal access that EEAST crews can access.
EEAST would expect any trench collapse to fall under the confined space regulations and EGET, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.	National Grid will seek to coordinate with the EEAST in the development and testing of emergency response plans. Nonetheless, appropriate health and safety precautions will be in place prior to construction commencing. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** includes a commitment for producing a construction phase Safety Health and Environment (SHE) Plan prior to construction works commencing and will ensure that adequate arrangements and welfare facilities are in place to cover the safety of construction staff, visitors to site, the public and compliance with appropriate legislation and guidance.
Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) and/or Air-Sea Rescue/ RNLI access, is therefore considered to be necessary.	National Grid will seek to coordinate with the EEAST teams and the HEMS teams in the development and testing of emergency response plans.
The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational capacity, efficiency and resources, including EEAST hazardous area response teams – HART, (which may also require co-ordination and joint tasking with the Maritime & Coastguard Agency and RNLI) needs to be presented and assessed, with any Chief Executive: Tom Abell Page 8 of 15 Chair: Nicola Scrivings www.eastamb.nhs.uk necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	National Grid will seek to coordinate with the EEAST teams and other blue light services in the development and testing of emergency response plans.
Population Increase, Health & Wellbeing	
It is evident that during the anticipated 4 - year construction period, a significant number of construction workers are required to implement the components of the Scheme.	The staff required during the construction of the proposed works would vary throughout time. It is anticipated that the peak workforce for the Suffolk Onshore Scheme would be approximately 327 which is expected to peak on 01 September 2026. The peak workforce in Kent would be approximately 231 which is anticipated to occur on the 25 April 2030. The peak Offshore Scheme workforce is expected to be 275. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to directly impact on EEAST's operational capacity, efficiency and resources, including its co-ordinated response with healthcare and blue light partners, is currently absent from the EIA scope, and any related technical report scoping.	A complete assessment of socio-economics effects has been undertaken, including an assessment of construction workforce and accommodation capacity. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Tourism and Recreation**, Section 9: Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects as a result of the Proposed Project. **Application Document 6.2.2.11 Part 2 Chapter 11 Health and Wellbeing**, Section 9: Assessment of Impacts and Likely Significant Effects assesses access to healthcare services with an increased demand. It is concluded that there are no anticipated significant effects.

East of England Ambulance Service Comment	National Grid's Response
This information therefore ought to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	The assessment identified no significant effects so no further assessment is deemed necessary.
Transport, Community Safety, Health & Wellbeing Working Group	
In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety, Health and Wellbeing Working Group - is established at an early stage in the DCO preparation process, and in advance of the Examination.	National Grid acknowledges these comments and welcomes the opportunity to engage with the EEAST and related bodies across the Proposed Project area. National Grid will use this engagement to ensure that matters of concern are identified and addressed.
This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, the SNEE ICB, Norfolk & Suffolk Constabulary and Suffolk Fire and Rescue Service, with liaison maintained with any other relevant organisations such as Air-Sea Rescue/ RNLI.	National Grid acknowledges these comments and welcomes the opportunity to engage with the EEAST and related bodies across the Proposed Project area. National Grid will use this engagement to ensure that matters of concern are identified and addressed.
The South East Coast Ambulance Service NHS Foundation Trust would need to be contacted in relation to similar Project impacts arising within its own administrative area, covering Kent.	Noted, no further comment required.
Concluding Remarks	
EEAST welcomes the opportunity to respond to the Sea Link EIA Scoping Report, and following review of the documentation, con that it is currently deficient in its proposed assessment of the potential Project impacts on EEAST as outlined above.	The assessment identified no significant effects so no further assessment is deemed necessary.
EEAST considers that the Project is likely to give rise to significant effects on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which ought to be baselined and assessed in order to determine appropriate mitigation and management measures.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** Assessment of Impacts and Likely Significant Effects concluded that there are no anticipated significant effects.
The Project is therefore considered likely to adversely affect EEAST's ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** Assessment of Impacts and Likely Significant Effects concluded that there are no anticipated significant effects.
Identified impacts arising from the Project should therefore be addressed by employing appropriate mitigation and management measures - to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** Assessment of Impacts and Likely Significant Effects concluded that there are no anticipated significant effects.
This approach ought to be reflected in a Statement of Common Ground to clarify the position reached and inform the forthcoming Examination process.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** concluded that there are no anticipated significant effects. An SOCG is therefore not deemed necessary in relation to this.
The measures ought to include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any operational and decommissioning phase) Project impacts and incidents, to optimise patient outcomes.	This comment is noted.

1.10 East Suffolk Council

Table 1.9 East Suffolk Council

East Suffolk Council Comment	National Grid's Response
East Suffolk Council (ESC) welcomes the opportunity to comment on the Sea Link Scoping Report dated October 2022. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008. The Council's detailed comments in relation to the Scoping Report can be found in Appendix 1 of this letter.	Noted, no further response required.
ESC would like to highlight that the Sea Link project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed1 , within the district. It is therefore essential that the project is not considered in isolation, and the full cumulative effects of Sea Link with other projects and proposals is adequately and appropriately assessed, mitigated and where appropriate compensated. In addition to the NSIPs that are consented/proposed in the east Suffolk area, there are also several projects consented and proposed in the wider Suffolk and East Anglia region which also need to be considered in terms of the wider reaching impacts.	Effect interactions between the Proposed Project and other proposed developments in Suffolk within the cumulative zone of influence have been identified and assessed within the ES and are reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. For further details of these effect interactions and any additional mitigation proposed please refer to this chapter. The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid will set out details of how the Project has coordinated with other projects as part of its DCO application. The Project has been designed to allow space in the surrounding area for the delivery and potential colocation of key infrastructure associated with other projects in Suffolk where it is feasible and beneficial. The assessment of combined impacts with these proposed projects is also considered in the ES within the cumulative effects assessment where relevant.
Since 2018, the Council has been engaging with the Government regarding the unstructured, noncollaborative approach to energy development. The Council would like to be supportive of well developed coordinated projects, that enable the goal of Net Zero and the interim targets. This however cannot be at the expense of Suffolk's environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation.	Noted, the Environmental Statement contained within this DCO application has comprehensively assessed the environmental impacts associated with the Proposed Project. Effect interactions between the Proposed Project and other proposed developments in Suffolk within the cumulative zone of influence have been identified and assessed within the ES and are reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. For further details of these effect interactions and any additional mitigation proposed please refer to this chapter.
Notwithstanding the Council's overarching positions on the projects, ESC has previously requested National Grid comprehensively and robustly explore every opportunity for coordination of the Sea Link project with other proposed and consented projects at all stages of the development consent process. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
ESC welcomes the work the developer has undertaken in conjunction with National Grid Ventures to consider opportunities for coordination. This work needs to continue and extend beyond the consideration of co-location to ensure that genuine coordination at all stages of the process is secured.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of

East Suffolk Council Comment	National Grid's Response
	inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
1 Volume 1 Main Text – Part 1	
Need for the Project - 1.1.2 Paragraph 1.1.2.3 identifies the potential additional generation, interconnectors, and energy storage which could be expected to connect in the East of England Region by 2035, established by the National Grid Electricity System Operator in the Future Energy Scenarios. Further information and clarification is required on whether the need relates to the current projects with grid connection offers in the district, future anticipated connections, or both. It would be helpful to clearly understand, based on the current known projects, at what point the reinforcements proposed are required. Whilst it is stated that the project aims to be delivered by 2029/30, that could potentially be after East Anglia One North, Two, and Three offshore wind projects are delivered, although it would be in advance of the Sizewell C project. Given the increasing difficulties developers are having identifying deliverable landfall locations along the east Suffolk coastline, the lack of offshore wind farm leasing options in the region in Round 4, and now the potential option for the Nautilus project to connect to the Isle of Grain, if the degree of predicted generation, interconnection and storage in the region is not realised, would this change the need case for the project or the date by which it is necessary	Subject to gaining development consent, construction works for the Proposed Project would be expected to start in 2026 and be functionally completed by the end of 2031 with reinstatement potentially continuing into 2032. The need for the Proposed Project is set out in the DCO application in **Application Document 7.1 Planning Statement** in Section 5. The Need for and Benefits of the Project. This should be read alongside **Application Document 7.2 Strategic Options Back Check Report and Application Document 4.2 Statement of Reasons** . The Proposed Project will reinforce the transmission system in the South East of England and East Anglia. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national and local policies and targets, the Proposed Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.
ESC agrees and supports National Grid and their commitment to undertake an Environment Impact Assessment.	Noted, no further response required.
If site 3 is selected following further detailed review of the site and design options, it is noted that the potential temporary access which would be required during construction to prevent vehicles travelling through Saxmundham, has not been included within the Suffolk Onshore Scheme Boundary. Given that it is known this temporary access would be required, this is considered an omission which should be addressed.	Site 3 (shown on Figure 2.1.3 in the EIA Scoping Report Volume 3 Figures) has been selected following further review of the design since the submission of the EIA Scoping Report. All required accesses are included within the Order Limits. It is proposed to access the Saxmundham Converter Station site from the B1121 (via proposed bellmouth S-BM09) both during construction and operation as shown in **Application Document 2.7.1 Access, Rights of Way and Public Rights of Navigation Plans - Suffolk**. For further details please refer to Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.
It is important that all temporary and permanent access arrangements are included within the Suffolk Onshore Scheme Boundary, including means of access for any early works in advance of formal commencement.	Noted, all temporary and permanent accesses are included within the draft Order Limits. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
National Grid has committed to a minimum of 10% Biodiversity Net Gain (BNG) across the project. Whilst this commitment is welcomed, as the project has two distinct geographic locations (Suffolk and Kent) it must be ensured that a minimum of 10% BNG is delivered in both areas. Delivery of greater BNG should not be proposed in one location at the expense of the other	Noted, two separate metrics to be used. 10% is to be delivered in each LPA. This has been discussed during the thematic meetings. Please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.
ESC fully supports the Secretary of State's decision to issue a Direction that confirmed the project should be treated as a development for which a Development Consent Order (DCO) under the Planning Act 2008 is required. ESC requested that National Grid seek a Direction and provided a letter of support to be submitted with the application.	Noted, no further response required.
ESC notes the key legislation identified in section 1.2.2 and welcomes the recognition of the draft National Policy Statements EN-1 and EN-5, which ESC considers will be important and relevant, in addition to any further draft versions published.	Noted, no further response required.

East Suffolk Council Comment	National Grid's Response
The converter station site options areas are all identified on the basis that the infrastructure should be within a 5km radius of the network connection point (paragraph 1.3.4.16). The connection sites explored were at Sizewell, the proposed Friston substation, and a new connection location on the existing 400kV overhead lines. Connection at the proposed Friston substation was identified as the Sizewell options were considered too constrained and 'connecting into a new connection point in the area, with an associated additional substation, was not preferred'. This however does not consider that the proposed Friston substation is subject to two legal challenges, the outcomes of which are not yet known. If for example, the East Anglia One North and East Anglia Two DCOs are quashed, the Friston site would also comprise 'a new connection point in the area' and therefore be considered in the same light as new connection points elsewhere.	The East Anglia One North and East Anglian Two windfarms have extant DCOs, which give established connection agreements at Friston, along with consented schemes to build the new substation at Friston. The Proposed Project DCO includes powers to build a substation at Friston and is therefore not reliant on the outcome of legal challenges to the East Anglia One North and Two windfarms. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, **Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** contains further details on the main alternatives considered for the Proposed Project. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
It is essential that National Grid commits to further consideration of their site options assessment following the High Court's decision on the Judicial Reviews, and dependent on the outcomes, this may require the assessment to be retaken. Without this commitment, the requirement to consider alternatives would be based on incorrect assumptions regarding the proposed Friston connection site	The East Anglia One North and East Anglian Two windfarms have extant DCOs, which give established connection agreements at Friston, along with consented schemes to build the new substation at Friston. The Proposed Project DCO includes powers to build a substation at Friston and is therefore not reliant on the outcome of legal challenges to the East Anglia One North and Two windfarms. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, **Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** contains further details on the main alternatives considered for the Proposed Project. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
ESC welcomes the additional work National Grid has undertaken to consider the concept of co-location of converter stations, shared cable corridors, and consolidation of landfalls (paragraph 1.3.4.67). ESC comments stated above similarly apply to the work undertaken; the site options considered for co-location are based on the assumption that the Nautilus and Eurolink projects are connecting to the grid at the proposed Friston substation. As the outcome of the legal challenges is not yet known, this work will need to be revisited and potentially re-assessed, dependent on the decision from the High Court.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.

East Suffolk Council Comment	National Grid's Response
ESC would like to emphasise that we requested all opportunities for coordination be explored during all phases of the development, both pre and post consent. This will extend beyond just co-location opportunities, although this is a fundamental consideration.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Paragraph 1.4.2.4 states that the proposed works at the Friston substation would comprise the installation of one Air Insulated Switchgear (AIS) bay, alternatively paragraph 1.4.2.5 states that if the Friston substation consented under the East Anglia One North and East Anglia Two offshore windfarms does not come forward, a new AIS substation would be constructed. The comments made above regarding the Judicial Reviews on the East Anglia One North and East Anglia Two DCOs apply, and therefore the project description in paragraph 1.4.2.5 may need to revisited subject to the High Court's decision.	The proposed Friston Substation is located to the north of the village of Friston and to the south of the existing 4ZW and 4ZX overhead lines and centred on Grid Reference TM4130961290 as illustrated on **Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk**. Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
If the High Court's decision is found in favour of the Secretary of State, or the decision does not affect the consented DCOs under which the proposed Friston substation is granted, it is considered that the project description should include the option to deliver an AIS or Gas Insulated Switchgear (GIS) extension/bay or new substation. The East Anglia One North and East Anglia Two DCOs included the option of delivering a GIS or AIS National Grid substation. It has not yet been confirmed publicly what technology the proposed Friston substation will utilise and therefore it would be appropriate to ensure both options remain available.	The proposed Friston Substation is located to the north of the village of Friston and to the south of the existing 4ZW and 4ZX overhead lines and centred on Grid Reference TM4130961290 as illustrated on **Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk**. Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The inclusion of this flexibility is considered especially important with the potential development of GIS substations which are not reliant on sulphur hexafluoride (SF6). The assessment should include consideration of the use of GIS technology to reduce the footprint of the infrastructure.	Gas Insulated Switchgear (GIS) is proposed for the substations. A commitment is made in the DCO application (see **Application Document 7.5.3.2 Construction Environmental Management Plan Appendix B Register of Environmental Actions and Commitments**) to use SF6-free switchgear in accordance with National Grid policy. Flexibility is maintained for detailed design and construction, with the 'Rochdale Envelope' adopted to allow a realistic worst-case assessment to be undertaken. In this instance maximum parameters for the size of the substations have been adopted and assessed in the EIA (see **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** for further information).
Whilst it is appropriate that the assessment takes account of whether the proposed Friston substation comes forward under the East Anglia One North and East Anglia Two DCOs or as a new	The proposed Friston Substation is located to the north of the village of Friston and to the south of the existing 4ZW and 4ZX overhead lines and centred on Grid Reference TM4130961290 as illustrated on **Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk.**

East Suffolk Council Comment	National Grid's Response
substation proposed under this project, the assessment should include consideration of the use of GIS technology to reduce the footprint of the infrastructure.	Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The comments provided going forward within this document are made notwithstanding the comments regarding the proposed Friston substation and the potential need for further consideration of the grid connection location and site selection options following the outcome of the Judicial Reviews, which will continue to apply.	Noted, no further comment required.
Table 1.4.1 provides a summary of the typical characteristics of High Voltage Alternating Current (HVAC) cables in Suffolk. The Council welcomes the inclusion within the assessment of the provision of up to 12 ducts. Coordination of the corridors and cabling works for the HVAC cables between the converter station site and National Grid substation is essential. It would be helpful if details were provided as to the typical characteristics of a coordinated HVAC cable corridor above just that of the potential width.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document .** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. For full details of the Proposed Project design please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Paragraph 1.4.2.10 states that the proposed converter station would be up to 10 hectares and 30m in height. ESC would like to take the opportunity to highlight that comprehensive and detailed justification will be required as to why the converter station for the proposed project is required to be this size when other similar converter stations for other projects are lower and occupy approximately half the footprint. Similarly robust justification will be required as to why the cable corridor for the project alone HVAC cabling needs to be 60m, ESC has experience of the East Anglia One North and East Anglia Two projects which proposed corridors widths of around half the width proposed by the Sea Link project.	Noted, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. for details on the scale of the infrastructure required for the Proposed Project.
ESC notes Table 1.4.2 provides details of the typical characteristics of HVDC underground cabling for Suffolk and welcomes the commitment in paragraph 1.4.2.13 to explore the ability to install cable ducts for other projects. Details of the characteristics of the coordinated HVDC cabling options would be welcomed. Also, similarly to the HVAC cabling, robust justification needs to be provided for the proposed cabling widths and why they cannot be reduced.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. For full details of the Proposed Project design please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.

East Suffolk Council Comment	National Grid's Response
ESC notes Table 1.4.5 provides an indicative construction programme for the Project based on the premise that the proposed Friston substation is constructed under the East Anglia One North and East Anglia Two DCOs. This identifies that construction could begin in 2026 and continue into 2030. The construction works could therefore coincide with the construction works associated with several other consented and proposed NSIPs. The full cumulative impacts of the potential simultaneous or sequential construction programmes on the environment and local community needs to be carefully and robustly assessed.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The Environmental Statement includes an updated description of other developments (**Application Document 6.3.2.13.A Appendix 2.14.A Descriptions of Other Developments**), outlining the changes to construction timeframes of other projects.
ESC notes peak workforce is anticipated to be 300-400 across the project.	The staff required during the construction of the proposed works would vary throughout time. It is anticipated that the peak workforce for the Suffolk Onshore Scheme would be approximately 327 which is expected to peak on 01 September 2026. The peak workforce in Kent would be approximately 231 which is anticipated to occur on the 25 April 2030. The peak Offshore Scheme workforce is expected to be 275. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
The enabling works and access and site preparation works identified within paragraphs 1.4.3.5 to 1.4.3.11 are noted. Given that enabling works are often sought to be undertaken pre-commencement, ESC would like to highlight at this early stage that the local authority is likely to require appropriate management of these works through a separate management plan, if the main management plans are not triggered until commencement.	Noted, for further details relating to the enabling works, access, and site preparation please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Paragraph 1.4.3.9 discusses possible reuse of aggregate; in addition to removal of the aggregate to an appropriate facility, consideration should also be given to retention or reuse by another project in the locality.	Noted, depending on the specific circumstances regarding the material and location/nature of re-use it might not be a waste at all. However, material excavated without any certainty of re-use can become a 'waste' unless utilised under an appropriate regime, such as the Definition of Waste Code of Practice (DoWCoP). A Site Waste Management Plan (SWMP) will be developed prior to construction. The contractor(s) will maintain and monitor the SWMP throughout the construction phase and oversee that any sub-contractor(s) adhere to the SWMP. The SWMP will set out, in an auditable manner, how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy. Dedicated areas will be identified on the construction plans to allow materials and wastes to be segregated at source, reducing the risk of damage or contamination.
ESC's comments in paragraphs 1.13 to 1.16 apply to paragraph 1.4.3.12 which describes the proposed Friston substation construction works.	Noted, no further response required.
Paragraph 1.4.3.15 states that the construction of a new National Grid substation at Friston would take approximately 18-24 months. It was understood under the East Anglia One North and East Anglia Two applications that this work could be spread over a four year period due to the need to time the works with outages. ESC would welcome confirmation and clarification if there has been further refinement of the construction timescales since the granting of the East Anglia One North and Two DCOs.	Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by the end of 2031 with reinstatement potentially continuing into 2032. An indicative construction programme for the Proposed Project including timings in relation to the construction of Friston Substation are presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Paragraph 1.4.3.29 states that the proposed HVAC and HVDC cables will typically be undertaken in an 80m and 40m wide working width respectively. ESC requires the minimal working width necessary to reduce the impact on the environment and local communities. Justification will be necessary to address to why 80m and 40m working widths are necessary when similar projects have demonstrated that they can achieve much narrower working widths. ESC also requests, as	Noted, **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** provides updated information relating to the working widths required. Please refer to this chapter for further information. The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting

East Suffolk Council Comment	National Grid's Response
previously stated, that all opportunities for coordination are explored which includes consideration of the relative timings of the projects i.e., simultaneously or consecutively, and the potential for shared or coordinated cable corridors to reduce the impacts caused during construction.	that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Paragraph 1.4.3.46 confirms that no decision has yet been reached as to whether the landfall will be constructed using trenched or trenchless techniques. ESC supports further investigations into trenchless techniques to reduce the impacts on the coastal environment and designated habitats.	The Proposed Development is committed to the use of trenchless techniques at both landfalls. This is presented in detail in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Decommissioning of the proposed Friston substation (paragraph 1.4.6.1), dependent on the number of connections, could become quite complex and requires careful consideration of any decommissioning plans.	Noted, for further details relating to the decommissioning phase please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Further clarification is necessary to understand the relationships between the relative lifespans of the National Grid substation in comparison to the converter station. Paragraph 1.4.6.2 states that refurbishment and plant replacement could extend the life of the converter station beyond 40 years, whilst the lifespan of the National Grid substation is stated to be 40 years only. In addition to this, how will decommissioning of the National Grid substation also be managed when it connects multiple projects to the grid and is therefore subject to multiple DCOs.	Noted, the anticipated operational life of the proposed Saxmundham and Minster Converter Stations is approximately 40 years. It is likely that during this period refurbishment and plant replacement would extend the life of the converter station rather than decommissioning. In the event that the Proposed Project ceases operation the proposed converter stations would be decommissioned in accordance with a decommissioning plan. For further details relating to the decommissioning phase please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.
Paragraphs 1.4.6.5 and 1.4.6.6 refer to different methods to decommission the onshore cables and marine cables. Full consideration of the impacts of the different techniques is required.	If the Proposed Project is required to be decommissioned, the proposed HVAC & HVDC underground cables would be decommissioned. Dependent on specific requirements the redundant cables could either be left in-situ, or all or parts of the cable could be removed for recycling. Where this is not possible, removed cables would be disposed of in accordance with the relevant waste disposal regulations at the time of decommissioning. For the decommissioning of the proposed marine cable, it should be noted that an initial decommissioning plan would be written once the final route and installation methodology is engineered by the Contractor. This would be in accordance with all applicable legislation and best practice guidance at the time of compilation, however as decommissioning of the cable would be many decades into the future, regulatory requirements and industry best practice may change. This decommissioning plan would be updated throughout the life of the project in preparation for the eventual decommissioning of the link. Dependent on requirements at end of asset life, the redundant cables could either be recovered for recycling (in its entirety, or in parts), or left in-situ, if that has less environmental impact. When decommissioning comprises of cable removal, the recovered cables/cable sections would be disposed of in accordance with the relevant waste stream management regulations at the time of decommissioning. Operations to undertake decommissioning of the cable would be dependent on the burial depth of the cable and the mobility of the seabed, which may have significantly changed the design depth of lowering and the depth of sediment over the cable at the end of asset life. For further details relating to the decommissioning phase please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.

East Suffolk Council Comment	National Grid's Response
Paragraph 1.5.2.3 references the need to identify environmental effects and, if any, propose project specific mitigation measures to avoid, reduce, or offset adverse environmental effects. The means to prevent the effect should also be included in this hierarchy.	Noted, identification of mitigation measures would encompass 'prevention' in this hierarchy.
The need for the Rochdale Envelope approach ahead of detailed design of the project is noted and accepted (paragraph 1.5.2.5). Whilst this is accepted to ensure a realistic 'worst case' assessment, it is essential that there is a commitment from the developer that all reasonable efforts will be made post consent to seek reductions in the parameters set on the 'worst case' basis. The developer should seek to achieve the delivery of a 'best-case' project to reduce the actual impacts of the project.	This comment is noted, and it is the case that where practicable, reductions from the worst case scenarios used as the basis for the environmental assessments will be improved upon.
Further clarification will be required in relation to the definition of temporary and permanent effects provided in paragraph 1.5.3.7. Whilst there are some effects that will cease when the activity or work is stopped or removed, the activity will occur over such an extended period of time that they should be considered permanent in assessment terms.	Noted, **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** has been amended to reflect this.
ESC notes that major and moderate effects are typically considered to be significant in EIA terms whilst minor and negligible effects are not significant (paragraph 1.5.4.12). ESC welcomes the acknowledgement that when intra-project cumulative effects are taken into consideration, individual not-significant impacts could become significant when their interrelationship is assessed (paragraph 1.5.5.3).	Noted, no further response required.
ESC notes the approach to be taken to assessing inter-project cumulative effects. Whilst the approach to the Zone of Influence (ZOI) is noted, this is reliant on the original area within which potential effects of the project will occur being accurately set. Further comments on this will be provided within the topic specific sections of this response.	Noted, no further response required.
ESC has noted some errors and points of clarification in Appendix 1.5.A which have been outlined below. It would also be helpful in the future if the lists relevant to the Suffolk and Kent onshore areas could be more clearly separated. • The distance identified between the East Anglia Two project and the Sea Link Suffolk Scoping boundary states 1.62km, this is incorrect as the two areas overlaps at specific locations, this also conflicts with the distance identified for East Anglia One North. • The East Anglia One North project has been incorrectly identified as not being within the Suffolk Onshore Scheme ZOI. • The distance between the Nautilus project and Suffolk Scoping boundary is 0.66km, again given the same connection location has been identified for both projects this needs clarification and amending. • It is noted that Brightwell Lakes (DC/18/4644/VOC, DC/17/1435/OUT, DC/18/2774/ARM) has been scoped out of the cumulative assessment as the development is outside the ZOI. Dependent on where the construction vehicles for the Sea Link project originate from, there could be cumulative impacts on shared junctions on the A12 and therefore further consideration should be given to this project.	Noted, the distances have been updated within the updated Shortlist, the distance from EA1N and EA2 to the Suffolk order limits has been noted as 0km. The distance from EA1N to the offshore order limits has been noted as 0.36 km and EA2 to offshore order limits 1.65 km. Within the amended shortlist of cumulative developments, EA1N has been noted as within the Suffolk and offshore ZOIs. Brightwell lakes does fall outside the ZOI at 21.47 km from the Suffolk order limits. However, it (DC/17/1435/OUT) has been included in the amended shortlist given the nature and scale of the development. For further details please refer to **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**.
Evolution of the Suffolk Onshore Scheme	
As stated in paragraphs 1.9 and 1.10 of this response, the identification of the proposed Friston substation as the preferred grid connection location does not take into consideration the existing Judicial Reviews and their outcomes. The network connection point will need to be reviewed considering the High Court decision and any subsequent decision made in the higher-level courts, should the matter be progressed. The converter station option areas were identified based on the grid connection at the proposed Friston substation, and therefore the siting options will need to	The East Anglia One North and East Anglian Two windfarms have extant DCOs, which give established connection agreements at Friston, along with consented schemes to build the new substation at Friston. The Proposed Project DCO includes powers to build a substation at Friston and is therefore not reliant on the outcome of legal challenges to the East Anglia One North and Two windfarms.

East Suffolk Council Comment	National Grid's Response
similarly be reviewed and potentially a new siting and routeing options assessment undertaken dependent on the outcome of the legal challenge.	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
ESC fully supports the undergrounding of the HVAC and HVDC cabling which is committed to in paragraph 2.1.5.21.	Noted, no further response required.
ESC welcomes the work that the developer has undertaken with National Grid Ventures to explore opportunities for coordination in terms of the converter site, landfalls, and terrestrial cable corridors.	Noted, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** .
Paragraph 2.1.9.1 does not include the connection infrastructure required for the development in the form of extensions to the proposed Friston substation or the potential construction of a new substation. The project description does not refer to the potential to lay ducting for future projects which was referenced in paragraphs 1.4.2.8 and 1.4.2.13.	Noted, this has been amended for consistency. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for further details.
Landscape and Visual	
The Scoping Report makes appropriate reference to relevant landscape related policy both at National level and District Council level (paragraphs 2.2.2.3 to 2.2.2.13). It is noted and accepted that the District Council's Settlement Sensitivity Assessments should be discounted because of their specific reference to housing and commercial development scenarios with no accommodation for energy related projects of the type under consideration (paragraph 2.2.2.11).	Noted, no further response required.
Due reference is also made to Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) planning practice guidance documents (paragraph 2.2.2.12), the AONB boundary line, the presence of Tree Preservation Orders, and Ancient Woodlands (paragraph 2.2.4.6). Other designations are also considered but scoped out of the Landscape and Visual Impact Assessment (LVIA) as not being of specific landscape relevance in respect of this assessment (paragraph 2.2.4.9). These assumptions are noted and understood.	Noted, no further response required.
The full suite of landscape character assessments from National level to District level is listed as part of the assessment, together with the relevant Seascape Character Assessments; also noted and accepted (paragraphs 2.2.4.12 to 2.2.4.17).	Noted, no further response required.
In addition to the seascape character documents identified, the developer should note and include reference to the Suffolk, South Norfolk, and North Essex Seascape Character Assessment (LDA Report Template (suffolklandscape.org.uk)	The Suffolk, South Norfolk, and North Essex Seascape Character Assessment has been referred to within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**.
The scope of the visual impact assessment in terms of potential receptors is comprehensive and noted (paragraph 2.2.4.20).	Noted, no further response required.
The initial locations of representative viewpoints for the converter sites are shown in Figures 2.2.9 and 2.2.10 are noted but it is recommended that final positions are microsited on site to ensure that	The representative viewpoints shown on **Application Document 6.4.2.1.7 Representative Viewpoint Locations** have been microsited to inform the assessment within **Application**

East Suffolk Council Comment	National Grid's Response
the given view is a genuine representation of the locality and not unnecessarily reliant on minor instances of screening vegetation that are not generally typical of the locality. Similarly, the limitations of using Zone of Theoretical Visibility (ZTV) for locating viewpoints should be understood and final positioning should be determined by on-site observation. ESC would therefore reserve the right to request the inclusion of additional or revised viewpoints.	**Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. The representative viewpoint selection has been discussed further with East Suffolk Council. The theoretical nature of ZTVs is noted and visibility has been checked on site.
The Council is concerned that Figures 2.2.9 and 2.2.10 show that same viewpoints for both Converter Station option sites plus their respective cable route options. This seems to suggest that viewpoint options for each alternative were compromised to achieve this uniformity across both main alternatives. The Council advises that this combined suite of viewpoints be reviewed to ensure that they have specific relevance to each project and that additional ones be added where it is apparent that there may be gaps in the informative.	This comment is no longer relevant as there are no longer Converter Station option sites. However, further information relating to the environmental, socio-economic, technical and cost constraints that have materially influenced decision making and the justification for discounting options related to routeing and siting options for the Proposed Project can be found within National Grids 'Sea Link Corridor and Preliminary Routeing and Siting Study' (National Grid, 2022). Further detail on the options and alternatives considered is also contained within the Environmental Statement within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**.
None of the viewpoints relate to the grid connection works proposed. ESC recommends that the site of the proposed Friston substation is appropriately assessed, and viewpoints included for this purpose.	Further representative viewpoints have been added to assess Friston Substation (predominantly under Friston Scenario 2) and are shown on **Application Document 6.4.2.1.7 Representative Viewpoint Locations**. This has been undertaken through consultation with stakeholders.
In addition to the representative viewpoints, the Council expects the inclusion of illustrative viewpoints including both photomontages and wireframes in order to demonstrate the widest understanding and depiction of the projects, not least of all for improved public understanding of what is being presented. Further, if new landscape planting is being relied on in mitigation for significantly adverse effects, this should be realistically shown in viewpoint illustrations. For the avoidance of doubt, anticipated growth rates of any new planting that is relied on to mitigate significantly adverse effects should be discussed and agreed with the Council prior to being depicted in illustrations.	The representative viewpoints shown on **Application Document 6.4.2.1.7 Representative Viewpoint Locations** have been discussed with stakeholders and it is not considered that additional illustrative viewpoints are required. The photomontages for the representative viewpoints are included at **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations** and included mitigation planting shown at year 15. The planting heights used in the photomontages have been discussed and informed by information presented by East Suffolk Council.
The principle of visualisations being based on maximum development parameters is noted and accepted (paragraph 2.2.4.31). The inclusion of any proposed mitigation planting must be realistic to ensure that the effectiveness of this planting is represented as accurately as possible. It is therefore requested that the growth rates for the planting are agreed with ESC prior to the preparation of the visualisations.	The photomontages for the representative viewpoints are included at **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations** and included mitigation planting shown at year 15. The planting heights used in the photomontages have been discussed and informed by information presented by East Suffolk Council.
It is not accepted as stated in paragraph 2.2.4.32 that the extensions to the National Grid substation are minor, especially when considered cumulatively with the development consented under the East Anglia One North and East Anglia Two DCOs. Volume 1 of the Scoping Report also discussed the possibility, should the proposed Friston substation not come forward, for the application to include a new National Grid substation in this location. Appropriate visualisations should therefore be prepared to consider the landscape and visual impacts at this site.	The photomontages for the representative viewpoints are included at **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations** and include reference to Friston Scenario 1 and Friston Scenario 2 where appropriate to illustrate the potential changes under each scenario.
The consideration of embedded and control and management measures in respect of potential mitigation provision is noted. Where reliance is placed on new planting to restore lost landscape fabric or to achieve screening benefit, full acknowledgement will need to be given to the potential limitations of achieving successful new planting in East Anglia given the recent trend for prolonged rainless periods of weather in the critical spring and early summer period. Such risks to successful plant establishment will need to be fully acknowledged and accounted for in planting strategies and specifications.	Further detail on management measures, including the establishment of new landscape planting, can be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk.** Landscape mitigation should be referred to within **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation.**
The outline control measures for protecting landscape features during construction are noted as the basis for further discussions. In paragraph 2.2.5.4 it is stated that a five-year aftercare period will be established for all reinstatement and mitigation planting. Whilst it is accepted that this may be an appropriate period for the hedgerow planting, a longer period is considered necessary to ensure the	Further detail on management measures, including the protection of existing landscape features and adaptive management, can be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk.** Landscape mitigation should be referred

East Suffolk Council Comment	National Grid's Response
successful establishment of the landscaping which is likely to be necessary around the converter station sites and potentially proposed Friston substation. Due to the risks to successful planting establishment described above, ESC wishes to highlight the need to consider adaptive management measures.	to within **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation**.
It should be noted that all important hedgerows within the onshore area should be identified in accordance with the Hedgerow Regulations 1997.	The DCO application includes the following plans - **Application Document 2.12.1 Tree and Hedgerows to be Removed or Managed Plans - Suffolk and Application Document 2.12.2 Trees and Hedgerows to be Removed or Managed Plans - Kent.** As assessment of Important Hedgerows is included in **Application Document 6.3.2.2.A Appendix 2.2.A Phase 1 Habitat Survey Report**.
In respect of potential impacts outlined in Table 2.2.6, the Council has some concerns regarding the following assumptions: • Operational lighting at converter stations - This has been scoped out as being of limited potential for significant effects partly because of the context of existing settlements. This does not seem to be a safe assumption given the relatively isolated location of potential converter station sites away from existing settlements. This assumption will need further justification. • Operational extension to the proposed Friston substation – This has been scoped out as it is considered there is less potential that significant effects will result on the landscape character or visual amenity. The Examining Authority took a different view when considering extensions to the proposed Friston substation in relation to the Nautilus and Eurolink projects during the East Anglia One North and East Anglia Two examinations. The Examining Authority's conclusions taken from the Secretary of State's letter (paragraph 5.21) are set out below: 'The extension of National Grid Substation Appraisal demonstrated a significant worsening of potential adverse effects for relevant VPs and for landscape character. The extension of the National Grid substation would intensify and worsen the effects of the Proposed Development on both the local landscape and on visual receptors.' There is also no consideration of the potential need for a new substation to be constructed should the proposed Friston substation not come forward under separate DCOs. It is essential that the cumulative impacts of the project with the consented East Anglia One North and East Anglia Two projects and proposed Nautilus and EuroLink Multi-purpose Interconnectors are understood and assessed ensuring that any further mitigation required is delivered. The scoping out of the impacts of the connection works is not accepted or considered justified.	Potential effects associated with the proposed lighting on landscape character and visual amenity have been considered within the Landscape and Visual Impact Assessment, refer to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. The consideration of both scenarios at Friston (Friston Scenario 1 and Friston Scenario 2) has been considered for both landscape and visual receptors within the Landscape and Visual Impact Assessment, refer specifically to **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**.
The described Landscape and Visual Impact Assessment methodology is accepted. It would however be helpful to include a definition of short, medium, and long term.	The definition of short, medium and long term has been included in the methodology at **Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology**.
A construction and operational lighting plan should be developed to consider, manage and mitigate the impact from temporary and fixed lighting associated with the construction and operation of the infrastructure.	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** provides information on lighting. Please also refer to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** for commitments relating to lighting.
Ecology and Biodiversity	
ESC broadly agrees with the scope of the ecological assessments to be included within the EIA. The Council does however have some comments on the detail of some of the ecological receptors and proposed assessments identified within the Scoping Report which will need to be addressed in the assessments.	Noted, no further response required.
Paragraph 2.3.2.5 and 2.3.2.6 reference Biodiversity Net Gain and the Council's previous comments in paragraph 1.6 of this response apply.	Noted, no further comment required.

East Suffolk Council Comment	National Grid's Response
It appears that there may be statutory designated sites missing from the list of those identified in Table 2.3.1, for example Snape Warren Site of Special Scientific Interest (SSSI) does not appear to be listed despite being within 5km of the Suffolk Onshore Scheme area. It should also be noted that The Haven, Aldeburgh is a Local Nature Reserve (LNR) not a National Nature Reserve (NNR) as referenced in Table 2.3.1.	These have been included in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
Also, please ensure that all interest features of the identified designated sites are considered as part of the assessment. For example, section 2.3.4.26 identifies that the Outer Thames Estuary Special Protection Area (SPA) is designated for wintering redthroated diver (Gavia stellata), whilst this is correct the SPA is also designated for breeding common tern (Sterna hirundo) and little tern (Sternula albifrons) which must be included as part of the assessment.	The HRA for the PEIR correctly identifies these features as will that for the ES.
It is noted that data on County Wildlife Sites (CWSs) and Roadside Nature Reserves (RNRs) is still being collected from Suffolk Biodiversity Information Service (SBIS), it must be ensured that this information is incorporated into the scoping considerations set out in Tables 2.3.4 to 2.38 so that potential impacts on such sites are fully assessed.	This data has been obtained and is taken into account in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
Bats - Section 2.3.4.34 identifies that bat activity surveys will be undertaken on all habitats where permanent infrastructure will be built along the route. It is considered that such surveys must also be undertaken on all habitats which will be temporarily impacted by the proposed development as well, as such construction can result in temporary impacts which occur for relatively long periods of time (such as hedgerow removal and replanting as part of cable installation).	Noted - temporary infrastructure locations have been included in surveys and presented in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
Hazel Dormouse – Whilst hazel dormouse is included as a consideration within Tables 2.3.4 to 2.3.8, they are not listed as a species to be surveyed for in section 2.3.4.3. It is noted that the consideration of this species in section 2.3.4.35 states that no records of this species were returned from the desk study area, however a record does exist from approximately 1km to the west of the Suffolk Onshore Scheme Scoping Area Boundary (Figure 1.1.2 Rev 6 in Volume 3) and therefore it is considered that surveys for this species should be undertaken where suitable habitat is present and likely to be impacted by the proposed development	Dormouse surveys are included in the scope and results are presented within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
All ecological surveys must be undertaken by suitably qualified ecologists following published best practice guidelines. Survey methodologies, coverage, and locations should be agreed with the Local Planning Authority prior to survey work commencing.	Noted, no further response required.
Clarification is required as to why Tables 2.3.4 to 2.3.8 do not scope in protected and notable species as receptors for the permanent habitat loss (terrestrial) impact pathway. Given the number of options currently included, it appears that permanent habitat loss which impacts on protected and notable species could occur as part of the development and therefore this must be included as part of the assessment.	Permanent habitat loss is considered in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**.
Cultural Heritage	
Paragraph 2.4.2.3 identifies the Local Policy Framework applicable to the consideration of heritage assets. Whilst the reference to the East Suffolk Council Local Plan is correct, the policies identified are not current. The relevant policies have been listed below: • Policy SCLP10.4: Landscape Character • Policy SCLP11.1: Design Quality • Policy SCLP11.3: Historic Environment • Policy SCLP11.4: Listed Buildings • Policy SCLP11.5: Conservation Areas • Policy SCLP11.6 Non-Designated Heritage Assets	Noted Relevant policies are noted in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and have been taken into account as part of the assessment.

East Suffolk Council Comment	National Grid's Response
• Policy SCLP11.7: Archaeology • Policy SCLP11.8: Parks and Gardens of Historic Landscape Interest	
ESC notes the 1km buffer boundary identified on Figure 2.4.1 and the heritage assets identified within this area listed within Appendix 2.4.A. There are however some assets which have not been included within the tables which ESC considers should have been. These have been listed below: • The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building) • Ogilvie Homes, Leiston Road, Aldringham (Grade II Listed Building) • Southview, Mill Lane, Aldringham (Grade II Listed Building) • The Ogilvie Almshouses, Church Lane, Aldringham (Grade II Listed Building) • Church of St. Andrew, Church Lane, Aldringham (Grade II Listed Building) • The Pantiles, Aldringham (Grade II Listed Building) • The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building) • 24 Westward-Ho, Leiston The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building) • Fisher's Farmhouse, Abbey Lane, Leiston (Grade II Listed Building) • Retreat House, Abbey Road, Leiston (Grade II Listed Building) • Barn at Abbey Farm, Abbey Road, Leiston (Grade II Listed Building) • The Guesten Hall at Abbey Farm, Abbey Road, Leiston (Grade II Listed Building) • Moat Farmhouse, Moat Road, Theberton (Grade II Listed Building) • Peakhill Cottages, Theberton Road, Kelsale (Grade II Listed Building) • Elm Tree Farmhouse, Aldeburgh Road, Aldringham (Grade II Listed Building)	Noted. A review of assets has been undertaken throughout the development of the Suffolk Onshore Scheme, and assets which for which there is the potential for significant impacts have been taken forwards to full assessment in the cultural heritage environment statement chapter (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**). This process has been informed by fieldwork, as well as consultation with stakeholders.
Although Conservation Areas have been identified within the criteria for assessing the value of heritage assets – Table 2.4.7 and mentioned briefly in paragraph 2.4.4.5, the potentially affected Conservation Areas have not been specifically identified within the Scoping Report. ESC wishes to highlight that it will be expected that Conservations Areas are considered within the assessment, specifically Saxmundham, Aldeburgh and Thorpeness Conservation Areas.	The final assets taken forwards to full assessment are based on the final design of the Suffolk Onshore Scheme. As such, it is considered that the potential for significant impacts on conservation areas are limited to Saxmundham Conservation Area, and this has been taken forwards to full assessment (see **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
The sources of construction impacts are noted in paragraphs 2.4.6.5 and 2.4.6.6 which include both the converter station and substation impacts on the setting of heritage assets. Paragraph 2.4.6.7 identifies the sources of operational impacts and whilst the new converter station is highlighted, the extension to the proposed Friston substation is not, nor is the possibility of a new substation referenced. Table 2.4.1 however confirms that the converter and substation infrastructure has been scoped in. Consideration should also be given to the need for a new substation, should this be necessary.	While it is assumed that the Friston Substation will be constructed by SPR as part of their consented scheme, a worst-case scenario has been adopted for the assessment and as such the Cultural Heritage assessment has taken into account the construction of both the Substation and the Converter Station. This is detailed in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Direct and indirect impacts through the alteration of the historic landscape should also be considered and scoped in. There is a significant amount of information available in relation to the historic landscape character of the Friston substation site submitted as part of the East Anglia One North and East Anglia Two DCOs. Appendix 1 of the Council's joint Local Impact Report written in relation to the East Anglia One North and East Anglia wo projects provides an assessment of the historic landscape of Friston and Knodishall (EN010077-002772-DL1 - Suffolk County Council - LIR.pdf (planninginspectorate.gov.uk). Whilst paragraph 1.4.A.3.2 in the Appendices has been noted. ESC requests that known non-designated assets not yet on the HER should be considered within the assessment.	Comment noted and no response required.
ESC would also like to highlight Sloe Lane and Nuttery Lane, whilst also not recorded on the HER these are historic roads, the impact of the proposals on these assets should be considered.	Both Sloe Lane and Nuttery Lane were examined as part of the earlier assessment, and were reviewed again as part of the final Suffolk Onshore Scheme. While the Suffolk Onshore Scheme will cross Sloe Lane, the works will be limited to physical impacts on a very small section of the track/footpath which extends for some distance. Furthermore, these works will be in an area where

East Suffolk Council Comment	National Grid's Response
	the track has been widened and altered by agricultural traffic, therefore limiting the historical integrity of the feature in the are of the crossing. Finally, no lasting impacts to the setting of the track are predicted and as such there are no significant impacts on the feature predicted. As such, it was not taken forwards to full assessment in the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Water Environment	
ESC will primarily defer to the Lead Local Flood Authority and the Environment Agency for their technical review of this section of the Scoping Report. The Council would however like to take the opportunity to highlight the importance of adequately and robustly assessing flood risk from all forms of flooding including surface water flooding. Reviewing the converter station sites on the Environment Agency's surface water flood map identifies several flow water paths which could be affected by the project.	A robust assessment of flood risk has been prepared and is reported in **Application Document 6.8 Flood Risk Assessment (FRA)**. The FRA addresses all relevant forms of flooding, including surface water, and has been informed by regular engagement with the Environment Agency and LLFA.
In relation to the grid connection location, there is a significant amount of published material available on the Planning Inspectorate's website submitted as part of the East Anglia One North and East Anglia Two DCO examinations. Friston village has been subject to surface water flooding on a number of occasions. A Surface Water Management Plan (SWMP) for the catchment of Friston village was commissioned by Suffolk County Council (SCC) as the Lead Local Flood Authority. This includes a detailed assessment of the catchment topography and characteristics to accurately model surface water flow paths. Dependent on whether the Sea Link project seeks extensions to the proposed Friston substation or proposes a new substation, there is potential for the development to interact with the flow paths identified by the SWMP.	Suffolk County Council have provided outputs and data from the Friston Surface Water Management Plan. This data has been reviewed and used to inform the Proposed Project design and **Application Document 6.8 Flood Risk Assessment**. The Project has secured robust measures for the management of surface water runoff to ensure no increase in this form of flooding during construction and operation of the Project.
The project will also have implications for the drainage solutions identified at the Friston site including requiring the removal of one of the consented drainage basins to accommodate the National Grid extensions. It is essential the full cumulative impacts of the developments are carefully assessed and fully understood.	The Project has completed a robust cumulative impact assessment which is reported in **Application Document 6.2.2.14 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
The Council notes that the operational impacts of the projects have been scoped out of the assessment. This is not supported or considered to have been sufficiently justified within the Scoping Report. Operational impacts associated with the projects should be scoped in.	Operational impacts of the some aspects of the Project were scoped out, in agreement with the Planning Inspectorate, given that many receptor source impact pathways would be removed following completion of construction and reinstatement of the land. However, operational effects on the land drainage regime/surface water flood risk are scoped in to **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.8 Flood Risk Assessment**.
Geology and Hydrology	
ESC will primarily defer to the Environment Agency for their technical comments on this section of the Scoping Report in relation to groundwater matters.	Noted, no further response required.
There is an expectation that land within the development area will be subject to assessment for land contamination in line with relevant guidance and legislation (including BS10175:2011+A2:2017 and the Land Contamination Risk Management (LCRM)) to ensure that contamination is identified and dealt with appropriately in respect of the development and sensitive receptors both onsite and offsite.	Noted, the Environmental Statement includes a preliminary Contamination Risk Assessment included within **Application Document 6.3.2.5.A Appendix 2.5.A Contamination Risk Assessment** that follows a staged approach as recommended within the Land Contamination Risk Management guidance.
The developer should also develop a robust discovery strategy to cover the eventuality that unexpected contamination is encountered and appropriately addressed.	Noted. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** contains measure (GH08) for development of a protocol for dealing with unexpected contamination

East Suffolk Council Comment	National Grid's Response
The developer should also take measures to identify Private Water Supplies in the vicinity of construction works so that they can be planned and undertaken in such a way as to prevent impact to those supplies.	Requests for information on active private water supplies have been made to allow assessment of potential impacts on these receptors. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** contains a measure (W08) in relation to the protection of private water supplies.
Traffic and Transport	
Whilst ESC defers to SCC as the Local Highway Authority for their technical input on this section of the Scoping Report, ESC would like to make some high-level comments.	Noted, no further response required.
The commitment within paragraph 2.8.3.3 to review the proposed study area for traffic and transport identified in Figure 2.8.1 is welcomed. ESC would like to be included in these discussions given the Council's detailed knowledge of the district and the linkages with effects on air quality. At present it is considered that the study area is too narrowly defined and further consideration of junctions outside of this area will be necessary. For example, the study area does not extend to the A12 and therefore excludes the junctions between the A12 and A1094 and A12 and B1121. The Council would have expected to see the transport impact modelled as far westward as, and including, the A12. It is also considered there is potentially the need to assess network locations beyond the point where the construction traffic would connect to the A12.	Noted. The proposed study area for the traffic surveys and assessment has been agreed with SCC as part of the transport thematic meetings.
As previously identified, the site access to Site 3 has not been included within the Onshore Boundary which should be addressed.	The order limits have been updated and the access strategy is set out in full within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
The widening of the study area is considered particularly important due to the potential inter-project cumulative impacts during the construction phase of the project with consented and proposed NSIPs and other major projects. These impacts need to be carefully considered and appropriately and adequately assessed and mitigated. Assessing the onshore study area only is considered inadequate.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The Environmental Statement includes an updated description of other developments (**Application Document 6.3.2.13.A Appendix 2.13.A Descriptions of Other Developments**), outlining the changes to construction timeframes of other projects.
Air Quality	
The developer has considered air quality in respect of vehicle emission issues locally and dust in respect of construction activities.	Noted, no further response required.
In respect of dust, the Outline Code of Construction Practice (OCoCP) includes dust in respect of the Construction Environmental Management Plan (CEMP). ESC would welcome inputting into this document. Given the soil conditions in the local area, it is likely dust could be a significant issue and so consideration should be given to Dust Management Plans to ensure that mitigation is designed and deployed appropriately, and these should be approved by the local planning authority.	A construction dust assessment has been undertaken in accordance with the IAQM best practice guidance and is located within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**). Construction dust mitigation measures have been incorporated into **Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice**. It should also be noted that liaison with ESC on air quality management has continued via the thematic meetings.
The developer has stated that a detailed assessment of vehicle emissions is to be scoped out as traffic flows are expected to be below the Institute of Air Quality Management (IAQM) screening criteria but goes on to say that they do not yet know vehicle numbers (Section 2.9.3). As it is an unknown quantity this should remain scoped in. Furthermore, HGV and vehicle numbers are a sensitive issue in respect of cumulative impacts with other projects and so consideration should be given to detailed assessment in respect of that cumulative impact.	Traffic flows have been compared with the IAQM criteria and are summarised in Appendix 2.7.G Highway Impact Assessment. Full details of traffic data are located in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport**.

East Suffolk Council Comment	National Grid's Response
The developer has stated that Euro 6 will be the standard for HGVs (paragraph 2.9.5.3), which is welcomed, along with the Construction Traffic Management Plan (CTMP) providing for GPS monitoring of HGVs and the use of authorised construction routes (paragraph 2.8.5.6).	Noted, no further response required.
The developer has stated the Suffolk scoping boundary is outside or not close to the Air Quality Management Area (AQMA). This may be the case, but construction related traffic has the potential to cause impact further afield than that assessed, especially if traffic travels through the AQMA at Stratford St Andrew. ESC suggests a wider scoping boundary should be considered, as previously highlighted in this response, to include impacts on the wider road network and potential impacts on junctions, considering cumulative effects with other developments.	Traffic flows have been compared with the IAQM criteria and are summarised in Appendix 2.7.G Highway Impact Assessment. Full details of traffic data are located in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport**.
It is stated that emissions from Non-Road Mobile Machinery (NRMM) should be scoped out due to the transient nature and incorporation of "best practice measures". This is premature as there is not yet sufficient detail to state that emissions from NRMM will not be an issue and this will need to be considered further.	The assessment of air quality effects includes consideration of emissions from NRMM and is presented in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**.
Noise and Vibration	
ESC considers that the developer has broadly considered the relevant areas in terms of noise and vibration impact, however further surveys are required moving forward and there is an expectation that the developer will design and manage this project with the minimisation and mitigation of noise and vibration impacts in mind.	Baseline noise surveys are detailed in **Application Document 6.3.2.9.A Appendix 2.9.A Suffolk Noise Survey Data**. Noise management and mitigation measures are detailed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan - Suffolk** is also provided.
The proposed study area of 300m from construction areas is accepted (2.10.3.2), although this will not prejudice complaints from noise sensitive receptors from further afield in the event the project is consented and implemented.	Noted, no further response required.
The developer has stated that BS5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Noise and BS 5228-2:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Vibration (BS5228), and specifically the "ABC" methodology of those standards, are to be used in relation to impact from construction noise and vibration. This is accepted as suitable (paragraph 2.10.3.2).	Noted, no further response required.
The developer had committed to Best Practicable Means (BPM), as defined in the Control of Pollution Act 1974 and expanded upon in BS5228: 2009+A1: 2014, in respect of site operations and mitigation for noise and vibration and this is welcomed. It is important that all relevant sections of BS5228 are considered and implemented, including section 8 – Control of Noise.	Noted, no further response required.
The developer has provided an OCoCP which includes noise and vibration management as is expected for this type of development and should be secured in a requirement in terms of compliance. The OCoCP provides a relatively high-level view of noise and vibration management and mitigation and commits for CEMPs to provide the detail in respect of specific works. The local planning authority should have some input into construction activities in terms of mitigation and monitoring for noise and vibration and therefore should be included in approving the CEMPs, if this is not possible and that position is justified there may be a need for a more detailed Noise Management Plan (NMP) as an appendix to the CoCP and consideration of adopting a Control of Pollution Act 1974 Section 61 approvals process.	Noted. **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan - Suffolk** has been provided.
The developer should produce a detailed complaints and monitoring plan including when and how they intend to inform the local planning authority, this should form part of the OCoCP, CEMP, NMP, S.61 as appropriate.	**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan - Suffolk** is provided. This ONVMP includes details of a complaints procedure.
The developer has considered noise and vibration from construction traffic, it is assumed this is in respect of highway noise and vibration which is a Highways Authority matter, and that site	Correct.

East Suffolk Council Comment	National Grid's Response
construction traffic noise and vibration will be considered in respect of the overarching construction noise and vibration requirements under BS5228 and in the OCoCP	
The developer has ascribed significance in respect of construction noise and vibration, and this should be in line with the BS5228 "ABC" methodology as proposed.	The BS 5228 'ABC' method is used as the basis of the construction noise assessment.
The proposed study area of 1000m from the proposed substation sites and the Friston site is accepted, along with the developer's emphasis on closer proximity Noise Sensitive Receptors (paragraph 2.10.3.5). In respect to location, the developer is advised that the proposed Friston substation is included in the East Anglia One North and East Anglia Two rating level for the site and as such this is a site wide constraint that they will have to meet.	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
The developer has proposed BS 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound (BS4142) in respect of operational noise assessment, and this is accepted (paragraph 2.10.7.14). The developer has also stated that the DCO will contain a requirement with an appropriate noise level, and this will need to be determined as a rating level using BS4142 in order to take account of any acoustic character to sound emissions and importantly to take account of the local context.	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
In respect of that context, the developer has correctly stated that the majority of the area is quiet, rural, and residential in nature. Therefore, there is potential for the introduction of a 24 hour a day 7 days a week industrial noise source to have significant adverse impact, and this is to be avoided, along with adverse impact mitigated and minimised in line with NPS EN-1 and the Noise Policy Statement for England.	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
The developer is also required to consider cumulative effects with other committed or consented major projects, principally, but not necessarily limited to, Sizewell C, East Anglia One North and East Anglia Two, as well as other proposed major projects such as Eurolink and Nautilus where there is information available to consider. "Noise creep" is a significant issue with the number of projects both planned and consented and needs to be considered, minimised, and where possible prevented entirely.	Noted, no further response required.
The developer ascribes significance criteria to operational noise in line with NPS EN-1 and states that a significant adverse effect is considered to occur at large or medium magnitudes of impact which Table 2.10.9 describes as a rating level between 5 and 9dB above background and more than 10dB above background respectively. As Significant Adverse Effects are to be avoided it is therefore assumed the developer is expecting to achieve 4dB above background or less as a rating level.	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
ESC's current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act 1990 applications but is equally relevant here and has been stated for other DCO projects we are involved with: Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
Due to the size of this type of project, the 5dB below background is an aspirational target and one ESC asks developers to consider as the appropriate limit. Deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which we will also require robust justification for. This should be in line with all relevant standards,	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.

East Suffolk Council Comment	National Grid's Response
guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration; in particular the requirement to mitigate and minimise noise impact although they appear very familiar with these principles which is comforting at this stage. Section 2.10.7.20 also implies that adverse effects will be avoided, and the rating level will be set below background so that the impact is negligible as is "standard practice", if this is the case it is to be welcomed.	
The overall expectation for operational noise is that a robust assessment will be undertaken using BS4142, that an appropriate rating level will be proposed relative to an appropriate representative background sound level, and that it will inform design and mitigation so as to reduce noise impact to an absolute minimum. A requirement in the DCO will be needed, and dependent on the rating level that is proposed, there may be a need for a further requirement with a commitment to reduce that rating level further should it be possible to do so at a later detailed design and implementation stage. The need to keep impact from operational noise to an absolute minimum cannot be understated and we will require robust justification in reaching agreement.	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
In terms of scoping, operational vibration has been scoped out and this is accepted, all areas that have been scoped in are agreed. The developer has however stated that noise from switchgear and emergency equipment such as generators and compressors should be scoped out, this is currently not agreed as it will be dependent on the likely frequency, duration, and mitigation for these events and therefore further justification should be provided	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.
Socio-economics, Recreation and Tourism	
The scale of the scheme, as indicated in the Suffolk Onshore Scoping Boundary, shows that irrespective of the preferred route and locations for the project, a large swathe of east Suffolk will be affected, whether on a temporary or permanent basis.	Since production of the EIA Scoping report and the Suffolk onshore Scoping Boundary, the design has been refined and the draft Order Limits have been developed. The Proposed Project as described within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** has been used as the basis for the environmental assessments contained within the various technical environmental statement chapters.
In considering the Suffolk Onshore Scoping Boundary, ESC would like to ensure that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider district. The Council question whether the 500m and 1km assessment limits described are appropriate (paragraphs 2.11.3.4 and 2.11.3.5), particularly when considering the permanence of the converter station and substation, and the visual impact for example. It is therefore considered that greater distances should be considered. Consideration needs to be given to an assessment of this interdependency and the impacts (including reputational and perceptual impacts) beyond the Suffolk Onshore Scoping Boundary, and the current 500m and 1km assessment limits.	**Application Document 6.2.2.10 Part 2 Chapter 10 Socio-economics, Tourism and Recreation**, Section 7: Baseline Conditions identifies receptors within, and up to 500 m radius from the Suffolk Onshore Boundary. 500m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits, based on the Design Manuel for Roads and Bridges (DMRB) LA 112. Receptors that lie outside of this study area but are deemed to be relevant have also been included within the assessment.
The visitor economy is one of largest economic sectors in east Suffolk and provides a good illustration of how the impact of the scheme extends beyond the boundary limits. There is a high degree of interdependency between visitor destinations, employment, and supply chains within east Suffolk.	This comment has been noted. No further response required
A successful visitor economy in east Suffolk is dependent on its reputation as a holiday destination, and the overall experience offered to visitors. The East Suffolk Visitor Economy Strategy identifies that together, the coastline, towns and places, natural landscape, and cultural offer present a compelling experiential proposition for the visitor. Visitors move from destination to destination using the 'B' roads identified within the scoping boundary, employees need to access their employment, and the potential for the displacement of visitors during construction, should not be ignored.	This comment has been noted. No further response required

East Suffolk Council Comment	National Grid's Response
ESC is concerned that disruption to the visitor experience will have a consequential impact on the perception of east Suffolk as a holiday destination and therefore negatively affect the visitor economy throughout the lifetime of the project.	This comment has been noted. Thematic Meetings with the local planning authorities have taken place between the PEIR and ES stages of the DCO application process. The thematic meetings have primarily focused on discussing points raised by local planning authorities in the statutory consultation. The meetings have run by the technical disciplines and provided an opportunity to bring questions, concerns and local context to attention to help inform the Environmental Statement. A complete assessment of socio-economic effects has been undertaken has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Tourism and Recreation**, Section 9: Assessment of Impacts and Likely Significant Effects. Determining the perception of East Suffolk as a visitor destination is outside the scope of the assessment.
ESC has recently published two relevant economic strategies which should be considered within the assessment: • East Suffolk Economic Strategy 2022 – 2027 (Link) • East Suffolk Visitor Economy Strategy 2022 – 2027 (Link)	This comment has been noted. These guidance documents have been considered in the preparation of the ES. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 6.2.10.2 Regulatory and Planning Context.
In addition, ESC has commissioned a Cultural Strategy which is due to be published in early 2023.	This comment has been noted. This guidance document has been considered in the preparation of the ES. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism**, Section 6.2.10.2 Regulatory and Planning Context.
The baseline assessments draw heavily on desk-based research and digital modelling for the identified receptors: • Employment levels in East Suffolk • Local economy within East Suffolk • Users of public rights of way and recreational routes • Local communities • Residential properties • Businesses • Visitor attractions • Development land	This comment has been noted. No further response required
Whilst the identified receptors conform with expectations, ESC believes that there is a need for caution as an over reliance on desk-based research and digital modelling could present a 'two-dimensional' assessment of the baseline. Field assessments including visitor, business, and resident surveys should be conducted to establish a baseline for some of the more qualitative or intangible impacts of the scheme. Especially, the perception of business owners and visitors towards the scheme, the impact on the visitor experience and reputation throughout the project life cycle, and the impact on the movement of residents and visitors during the construction phase.	We are confident that our desk-based analysis is sufficiently robust. The approach and methodology used remains consistent across DCO infrastructure projects. We recognise that certain effects can only be evaluated on a qualitative basis and in turn defined effects in the ES using beneficial, adverse and no effect classifications. The assessment of effect on tourism and recreation assets is included in the assessment within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**.
The Council agrees with the identified sources and impacts that are likely to occur during the construction, operation, maintenance, and decommissioning of the project.	Noted, no further response required.
ESC agrees with the identified effects, and degree of effects, on the socio-economic, recreation, and tourism activities within east Suffolk. However, there needs to be additional consideration given to the combined or cumulative effect of other potential and confirmed construction projects such as Sizewell C, onshore infrastructure in support of the wind farms(East Anglia One North and East Anglia Two), and the proposed Eurolink and Nautilus projects. If the landfall at Aldeburgh is taken forward for Sea Link and the interconnectors and construction works overlap, there will be a significant concentration of construction work and associated vehicle movements in this honeypot location. If the timing of this work coincided with the peak tourist season, this would cause significant additional traffic pressures in the area. The resultant traffic pressure in addition to the disruption caused by the construction works could have significant impacts on local tourism. Consideration	It is acknowledged that Sea Link will be under construction alongside other schemes in the area which has been considered in the Inter-Project Cumulative Effects chapter of the ES for each discipline, including Traffic & Transport. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** is based on **Application Document 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments**, which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The traffic and transport cumulative assessment considers the additional traffic to be generated across the highway network (within the study area) by the Proposed Project and other cumulative schemes, based on the same assessment criteria assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7**

East Suffolk Council Comment	National Grid's Response
must be given to the timing of the works within the assessment. The implications of restricting the timings of the work would then need to be considered carefully within different topic areas of the EIA and balanced against any other associated impacts.	**Traffic and Transport**. Robust assumptions have been made with respect to adopting peak construction traffic flows associated with Sizewell C and the SPR schemes, as well as with other committed developments where necessary. Construction/ operational traffic has been included as part of the assessment for committed developments where there is the potential for this traffic to overlap with the construction phase for the Proposed Project i.e. during the five year period, not just the peak construction year. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effect** assesses the impact of the Proposed Development incombination with a number of major infrastructure projects. It is concluded that there are no anticipated significant socioeconomic effects.
It is noted that the project will generate direct and indirect temporary employment, training, and apprenticeship opportunities, both on site and in the supply chain during the construction, maintenance, and decommissioning phases. The Council would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment within the visitor economy and wider business population are suitably assessed and mitigated.	National Grid supports the delivery of community benefits associated with transmission infrastructure, and already has a number of established programmes which deliver this. The former Government consulted on community benefit options associated with transmission infrastructure, and proposed the introduction of guidance in this regard. We support this and believe it should be flexible, allowing community benefits to respond to local and regional need. Whilst we await clarity on the government's position, we are working to understand local and regional aspirations and priorities in relation to community benefits. We welcome the suggestions for delivering community benefits and as the project progresses, we will maintain dialogue with the County Council and other stakeholders to further inform our approach. With regards to Employment and Income, **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** outlines in depth the impacts of the Proposed Project on the existing local economy.
It is agreed that the employment and wider economic activity created during the construction, maintenance and decommissioning phases will generate Gross Value Added (GVA) within the local East Suffolk economies. ESC would however need to be reassured that the additional GVA created through the scheme is not negated by adverse impacts on the wider economy. The Council also considers that the assessment should consider the net gain in GVA, and not only assess the direct and indirect contribution of the scheme but also examine any potentially negative impact on GVA within the wider economy.	Operational GVA has not been included within the Assessment of Impacts and Likely Significant Effects as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The Assessment of Impacts and Likely Significant Effects within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** includes the GVA generated by the Suffolk Onshore Scheme during the construction phase.
It is noted that disruption to public rights of way network or other recreational routes during the construction maintenance and decommissioning phases would be avoided as far as possible. Where necessary, suitable diversions would be agreed with SCC. Whilst diversions may be unavoidable, the impact of re-routing traffic, and potential delays needs to be explored, particularly regarding the impact on businesses, and the visitor experience.	As part of Thematic meetings, the assessment approach to PRoW has been discussed with stakeholders. We are confident that our desk based approach is sufficiently robust and incorporates best practice methodology used on comparable DCO schemes. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** Section 9: Assessment of Impacts and Likely Significant Effects concludes that there are no anticipated significant effects on PRoW and recreational routes as a result of the Proposed Project. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. An assessment of PRoW diversions and closures is contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**.
ESC notes that a number of residential properties, local businesses, visitor attractions, community facilities, open spaces, and development land allocations have been identified within the study area which could be impacted by land take or amenity impacts. Any impacts should be temporary whenever possible and affected receptors should be suitably consulted and engaged with during the life cycle of the scheme.	Comment noted, no further comment required.

East Suffolk Council Comment	National Grid's Response
The Scoping Report states that the scale of operational employment generated is likely to be very limited. The energy sector, both onshore and offshore, is a significant employer in East Suffolk, and the opportunities to attract the current and future workforce into high-skilled, high-value employment within the sector should be explored during the operational phase. The scale of operational employment generated is identified as likely to be very limited and therefore any effect on GVA will be small. However, the lasting impact on indirect employment and business vitality within other key sectors should be explored, ensuring that the scheme delivers a net gain in GVA during the lifetime of the project.	Operational Employment and GVA has not been included within the Assessment of Impacts and Likely Significant Effects as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The Assessment of Impacts and Likely Significant Effects within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** includes the employment and GVA generated by the Suffolk Onshore Scheme during the construction phase.
ESC has commented on the data sources and requests that recent economic and tourism strategies are considered within the assessment. Consulting with local stakeholders is also important, providing additional qualitative dimension to the analysis. ESC strongly agrees that the assessment methodology should entail the following: • Assessment of the likely scale, permanence and significance of effects associated with socioeconomics, recreation & tourism receptors; and • An assessment of the potential cumulative impacts with other projects within the surrounding area.	Relevant legislation, national policy and local planning policy has been considered. Please refer to **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 2: Regulatory and Planning Context. As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**, the general approach taken to determining the significance of effect in this preliminary assessment is only to state whether effects are likely or unlikely to be significant, rather than assigning significance levels. The impact on private, community, recreation and tourism assets is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. A complete cumulative assessment has been undertaken. This is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects**.
ESC also agrees with the statement that the socioeconomics, recreation, and tourism effects of the scheme will be assessed on: • Consideration of sensitivity to impact… and that 'the assessment will need to take account of the qualitative sensitivity of each receptor and, in particular, their ability to respond to change based on recent rates of change and turnover (if appropriate); and • Scale of impact: this entails consideration of the size of the impact on people or business in the context of the area in which effects will be experienced.	As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**, the general approach taken to determining the significance of effect in this preliminary assessment is only to state whether effects are likely or unlikely to be significant, rather than assigning significance levels. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** presents the socio-economic, recreation and tourism impacts by geographical scale at which each component is assessed, and the rationale behind these geographical scales
Health and Wellbeing	
ESC refers back to comments made in previous sections of this response as this topic area is influenced by technical assessments made in a number of other chapters of the EIA. It is considered that flood risk should also be taken into account.	An assessment of effects on floodplains and flood risk is set out in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**.
The developer will be aware that effective community engagement and complaint response (and where appropriate resolution) is a key part of all stages of large-scale projects, including Sea Link. The nature of community engagement by a developer can have a significant impact on the local communities' experiences. The project should have well developed community engagement and complaint procedures, the latter should include notification to the local planning authority within a reasonable time period.	As outlined within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**, members of the community and local businesses will be kept informed regularly of the works through active community liaison. This will include notification of noisy activities, heavy traffic periods and start and end dates of key phasing. A contact number will be provided which members of the public can use to raise any concerns or complaints about the project. All construction-related complaints will be logged by the contractor(s) in a complaints register, together with a record of the responses given and actions taken.
Cumulative Effects	
The previous comments highlighted within this response which relate to cumulative effects are relevant to this chapter of the Scoping Report. Section 2.13.3 sets out the methodology to be used for inter-project cumulative effects. The commitment in paragraph 2.13.3.2 by the developer to regularly review and update the list is welcomed.	Noted, no further response required.

East Suffolk Council Comment	National Grid's Response
Further clarity is sought regarding the topics to be included within the inter-project cumulative assessment. Table 2.13.2 identified study areas for some environmental topics, not all the topics have however been included within the table. Further clarification is required as to whether if a study area has not been identified, this then scopes the matter out from consideration within the assessment? The Council would like to make it clear that all topic areas should be included within the inter-project cumulative assessment given the current proposals for co-location of infrastructure with the Nautilus and Eurolink projects, notwithstanding the recently consented NSIPs in the locality. The topic areas which currently appear to be missing from the assessment are socioeconomic, recreation and tourism, and health and wellbeing. These should be included	A full inter-project cumulative effects assessment has been carried out for the Proposed Project. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The Environmental Statement includes an updated description of other developments (**Application Document 6.3.2.13.A Appendix 2.13.A Descriptions of Other Developments**), outlining the changes to construction timeframes of other projects.
ESC considers that further justification is required for the ZOI identified. Previous comments within the topic specific sections of this response are applicable.	During Scoping an overall cumulative assessment ZOI of 20 km was proposed. This was based upon the largest topic study area, ecology and biodiversity being identified as 10 km, therefore a ZOI of 20 km from the Suffolk Onshore Scheme was established to identify the initial long list of other developments. This ZOI has been backchecked as part of this ES to take account of any changes in the proposed technical topic study areas since PEIR. The study areas applied within the technical chapters 1-11 have been used to inform the ZOI and are summarised in the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. The maximum ZOI used to generate the long list remains at 20 km from the Suffolk onshore scheme boundary and the longlist has been updated accordingly. Further information regarding the methodology for generating the ZOI is contained within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Paragraph 2.13.3.5 states a 20km ZOI will be utilised to establish the long list of developments. Whilst that may be appropriate for major planning applications it is considered that a larger ZOI is utilised in relation to NSIPs due to their scale and associated impacts.	During Scoping an overall cumulative assessment ZOI of 20 km was proposed. This was based upon the largest topic study area, ecology and biodiversity being identified as 10 km, therefore a ZOI of 20 km from the Suffolk Onshore Scheme was established to identify the initial long list of other developments. This ZOI has been backchecked as part of this ES to take account of any changes in the proposed technical topic study areas since PEIR. The study areas applied within the technical chapters 1-11 have been used to inform the ZOI and are summarised in the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects**. The maximum ZOI used to generate the long list remains at 20 km from the Suffolk onshore scheme boundary and the longlist has been updated accordingly. Further information regarding the methodology for generating the ZOI is contained within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. It is considered that any NSIPs beyond 20 km would not result in any potential significant cumulative effects and therefore other developments beyond this distance have not been considered further in the CEA. For further details regarding the methodology applied please refer to **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies**.
ESC considers that amendments are necessary to Table 2.13.3 in relation to the distances between the projects and Sea Link's Project Scoping Boundary, particularly in relation to those which would share a connection location under the current proposals. The table has omitted reference to East Anglia One North, although East Anglia Two has been included. As stated above, it is considered that this list should include NSIPs within a wider search area.	All NSIP projects within 20 km of the Order Limits have been considered for the Suffolk Onshore Scheme CEA. NSIP projects that have made it to the short list for Suffolk include: EA1N, EA2, Sizewell C, Lion Link and Norwich to Tilbury. Further information regarding the shortlisted development can be found within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. Distances between the other

East Suffolk Council Comment	National Grid's Response
	developments and the Proposed Project can be found within **Application Document 6.3.1.5.B Appendix 1.5.B Inter-Project Cumulative Effects Initial Long List**.
It is welcomed that the list of projects to be included within the cumulative assessment will be continually reviewed.	Noted, no further response required.
ESC wants to highlight within the section on cumulative effects that the grid connection site at Friston is subject of a masterplan. Any future connections or works at Friston will need to carefully consider the implications of the works on the masterplan for the site, in addition to carefully considering the in-combination effects of the proposals. It is essential that the developer understands the sensitivity of the connection site. In the Examiner's Report on East Anglia One North and East Anglia Two the Examining Authority observes: '… that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.'	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
To accommodate additional extensions to the proposed Friston substation, not only was it acknowledged at the time of the examination that the landscape and visual effects would be intensified, but the development would also remove the land currently identified for a drainage basin. This would therefore require fundamental changes to the masterplan for the site.	Comment noted. Please refer to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** for the full landscape and visual impact assessment. For the assessment of inter-cumulative project effects please refer to **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Physical Environment	
The size of the site required for the permane+E333:E342during construction has not been specified further clarification on this is required. Table 2.2.6 identifies the sources and impacts; it is essential that an assessment of temporary and/or permanent 'coastal change' as a potential impact on the receptors at the landfall is included.	Impacts to coastal erosion for the Offshore Scheme is presented in **Applications Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. **Application Document 6.2.4.1 Part 1 Introduction Chapter 4 Description of the Proposed Project** also outlines the installation parameters at the landfalls which are assessed.
ESC would like to highlight that the Environment Agency has coastal management responsibility for the shoreline between Thorpeness and Aldeburgh and therefore must be included as a key consultee going forwards.	Noted, National Grid has been regularly engaging with the EA. For further details, please refer to **Application Document 5.1 Consultation Report**.
ESC wishes to raise in reference to paragraphs 4.2.4.1 and 4.2.4.2 that it will be important that National Grid provides a clear methodology as to how the baseline conditions will be surveyed and monitored, in addition to describing how project-induced deviation from the baseline will be ascertained.	Impacts to the Physical Environment for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**.
The Environment Agency guidance referenced in paragraph 4.2.4.12 seems ubiquitous across the UK, rather than specific to the East Anglian coast. ESC requires the application of site-specific data rather than generic figures within the assessment.	Where feasible, site specific data has been used to inform **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**.
In reference to Table 5.3.1, the Coralline Crag is the key geological receptor and ESC would not support any avoidable disruption of this geological feature.	Impacts to the Physical Environment for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. This includes an assessment into Corraline Crag.
Paragraph 4.2.4.29 states 'At the preferred Suffolk landfall, there is a net northerly sediment transport. Aldeburgh is situated south of the promontory of Thorpeness, which restricts the southward net littoral drift.' Further research is needed to support this statement (presumably adapted from SMP7 Appendix C Coastal Processes). Other, more recent, investigations suggest alternative sediment transport directions as listed below: The coast between Lowestoft and Orford Ness shows predominantly north to south transport. Localised reversal in net transport is evident at Benacre Ness and also at Thorpeness. Burninghan, H., and French, J. 2016. 'Shoreline – Shoreface Dynamics on the Suffolk Coast' The Crown Estate,	Impacts to the Physical Environment for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. The most up to date literature has been included in this assessment.

East Suffolk Council Comment	National Grid's Response
117 pages. Divergence of longshore transport may occur locally, likely influencing the high alongshore variability. Alongshore Variability in the Response of a Mixed Sand and Gravel Beach to Bimodal Wave Direction by John Atkinson & Luciana S. Esteves, 2018. Since the net alongshore sediment transport from Sizewell Bay is directed to the south, there must be mechanisms that facilitate sediment to move around the Ness and thereby maintain the beaches at Thorpeness. Mott Macdonald https://www.coasteast.org.uk/assets/img/1414342.pdf	
ESC welcomes the research into trenchless cabling techniques such as Horizontal Directional Drilling (HDD) to minimise impact on the coastal environment, though some trenching is likely to be required.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. Further information is presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**).
Table 4.2.5 identifies erosion estimates for the Aldeburgh to Thorpeness coastline, and ESC requests the source of these erosion estimates be provided. ESC agrees that a desktop study be undertaken to investigate if the impact on the current coastline is significant. ESC would wish to see the desktop approach taken to coastal change assessment by Scottish Power Renewables (SPR) for the proposed East Anglia One North and East Anglia Two projects repeated in this scheme, as an example of good practice.	Impacts to coastal erosion for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**.
Paragraph 4.2.4.29 identifies further predicted erosion rates, and ESC requests the source for these forecasted erosion rates be provided.	Impacts to the Physical Environment for the Offshore Scheme is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. The most up to date literature has been included in the assessment.
Paragraph 4.10.4.16 states that there have been 17 bathing areas in the study area, none of the listed bathing areas are in Suffolk. The EA's official list of bathing waters (test sites) is not representative of the popularity of bathing beaches in Suffolk and especially between Aldeburgh and Thorpeness. Other recreational activities such as bathing and dog walking are also popular at Sizewell Gap. More research and consideration is required as to the impact of this scheme on coastal recreation in Suffolk.	Recreational activities that are impacted by the Proposed Project have been assessed in A**pplication Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**.

1.11 Environment Agency

Table 1.10 Environment Agency

Environment Agency Comment	National Grid's Response
Thank you for consulting the Environment Agency on the EIA Scoping Report for Sea Link. We have reviewed the Scoping Report as submitted to the Secretary of State on 24 October 2022 and wish to highlight the following comments for consideration.	Noted, no further response required.
We note that Part 2 of 7 – Volume 1 – Suffolk Onshore Scheme contains five options for the location of onshore infrastructure in Suffolk. We have not provided a comparison or preference for any option, and instead offer advice that can be applied to the chosen option as appropriate	Noted, no further response required.
Water Environment	
We have reviewed sections 2.5 Water Environment and 3.5 Water Environment in the Kent and Suffolk Onshore Scheme documents.	Noted, no further response required.
We are satisfied with the criteria that has been scoped in, and that the report has identified the relevant flood risk policies from both the East Suffolk Council – Suffolk Coastal Local Plan and the Dover District Council Core Strategy and the Dover District Local Plan. The report also confirms that a site-specific Flood Risk Assessment will be submitted, which will consider all sources of flood risk during both construction and operation and incorporate allowances for climate change.	Noted, no further response required.
The scheme incorporates main river crossings, including the Thorpeness Hundred and the River Stour. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission	Noted, all relevant consents required in addition to the Development Consent Order would be secured prior to any activities commencing on site.
We would oppose the culverting of any watercourses and instead prefer the installation of a temporary clear-span bridge crossing. This is in line with the Environment Agency's anti-culverting policy. We will normally only grant a permit for a culvert if there is no reasonably practical alternative, and if the detrimental effects would be sufficiently minor that a more costly alternative would not be justified or there are reasons of overriding public/economic interest.	This comment regarding opposition to culverts is noted. Application Document 6.9 Water Framework Directive (WFD) discusses where temporary and permanent culverts would be required as part of the Proposed Project and the justification for this. It also assesses the effects of culverting on WFD waterbodies. **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** also assess the impacts from culverting. The proposed approaches to watercourse crossings are outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Detail is also provided within Application Document 6.3.1.4.A Appendix 1.4.A Crossings Schedules. A suite of measures to reduce the temporary impacts of watercourse crossings are described in **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)**, specifically **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments.**
Sections 2.5.5 and 3.5.5 Embedded and Control & Management Measures identifies the measures relevant to the control and management of impacts that could affect flood risk and land drainage	Noted, no further response required.

Environment Agency Comment	National Grid's Response
within the Outline Code of Construction Practice. We agree with these measures and note that designated shellfish waters are located on the North Kent coast, which increases the need for pollution prevention measures to controlled waters, including groundwater.	
We welcome the reference to a Water Framework Directive (WFD) Screening Assessment, the scope of which will be agreed with the relevant stakeholders but will include all those WFD waterbodies with the potential to be affected. We note that 'the assessment will identify how the Project design will avoid waterbody deterioration, as well as any other mitigation necessary'. We consider preventing waterbody deterioration as the minimum requirement and would like the assessment to additionally consider ways that waterbody enhancements can be made through the Project design.	The Project has engaged with the Environment Agency and other water environment stakeholders to discuss opportunities to contribute to waterbody enhancements. For further details please refer to **Application Document 6.9 Water Framework Directive Assessment**.
Ecology and Biodiversity	
We are satisfied that the appropriate topics have been scoped in. Trenchless construction techniques are proposed as the method for crossing main rivers. This is welcome, as open trenching of a watercourse does bring impacts on species present and potential geomorphological impact. Our concerns include impacts on water voles, direct impact on fish species, issues with diffuse pollution and creation of silt clouds. Opportunities for beneficial restoration at main river crossings should be explored in any construction scenario.	Noted. While trenchless techniques have been considered for main rivers this has not always been possible.
As of 1 October 2022, the Eurasian Beaver (Castor fiber) has been granted native species status and is fully protected as a European protected species under The Conservation of Habitats and Species Regulation 2017 in England. Any works that may impact beavers and/or their dwellings/ resting places may require a licence from Natural England.	Noted - beaver surveys have been undertaken in Kent and impact on beaver will be considered within **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**.
All measures described within sections 2.5.5 and 3.5.5 Embedded and Control & Management Methods must be strictly adhered to, particularly when working in or near water. The Biodiversity Net Gain assessments for these works must also include a River Condition Assessment where the River Stour is likely to be impacted.	Noted. Morphological surveys have been undertaken prior to the DCO Submission and are included within **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**
We are satisfied with the topics that have been scoped in which deal with the Physical Environment and Benthic Ecology for the Offshore Scheme, as shown in Tables 4.2.4, 4.2.5 and 4.3.6.	Noted, no further response required.
However, it is not clear what method will be used to bring the cables onshore from the subtidal to intertidal area. For all potential methods we request that the potential disturbances are scoped in. If a large vessel being grounded is the favoured option, then we advise that an assessment for this will be required in addition to the normal assessment of the cable route. The intertidal impact assessment surveys for this must include the maximum potential footprint from a large, anchored vessel on the lower subtidal area of the shore in addition to the footprint of the cable burial corridor across the intertidal mudflats.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. Further information is presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**)**.** Detailed installation methodologies at landfall are presented in detail in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** Impacts to benthic ecology are addressed in **Application Document 6.2.4.2 Part 4 Marine Chapter 3 Benthic Ecology**.
We requested a copy of "Environmental Survey Report: SEA Link Marine Survey. September – October 2021. National Grid | October 2022" that is referenced on page 43 of Part 4: Offshore Scheme. We also requested the full data for any subtidal and intertidal surveys that were used to inform this report, including a raw Benthic taxa list. However, we did not receive this before the EIA Scoping Report deadline. After we have reviewed this information, we may have further advice on what needs to be scoped in.	The Benthic Characterisation Report for the Proposed Project is presented in **Application Document 6.3.4.2.A Appendix 4.2.A Benthic Characterisation Report**.
Additionally, we wish to reiterate the need for Horizontal Directional Drilling (HDD) methods crossing the salt marsh area in Pegwell bay. We would oppose a method other than HDD at the chosen landfall as previous trenching damaged features of the site and the site has yet to recover. If a different construction method is taken forward, we would welcome early engagement on this matter.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. Further information is presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**)**.** Detailed installation methodologies at landfall are presented in detail in **Application**

Environment Agency Comment	National Grid's Response
	Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project. Impacts to benthic ecology are addressed in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology**.
We are pleased that thought has been given to the cumulative effects of the project. We look forward to reviewing the intra-project and inter-project cumulative effects assessment for the whole lifetime of the projects in due course. We will be particularly interested regarding impacts on the Benthic Ecology and Salt Marsh habitats.	Noted, no further response required.
Geology and Hydrogeology	
We are satisfied that the appropriate topics have been scoped in which deal with groundwater protection and will provide further relevant details for assessment in the Environmental Statement.	Noted, no further response required.
Temporary physical disturbance and changes to watercourse flow regimes (for several months) are likely to require permits from the Environment Agency as temporary physical disturbance and changes to watercourse flow regimes could still have the potential to interrupt or reduce local licensed abstraction if at or upstream of a point of abstraction. Dewatering activities may also require an abstraction licence or transfer licence from the Environment Agency for the same reasons.	Noted, all relevant consents required in addition to the Development Consent Order would be secured prior to any activities commencing on site.
We note that the Potential Effect of 'Changes to groundwater levels, quality and groundwater flow direction caused by dewatering' to 'Environmentally sensitive sites, groundwater, GWDTE, surface water' has been scoped in to the Assessment, as shown in Tables 2.6.2, 2.6.3, 3.6.2 and 3.6.3. We look forward to reviewing this at the appropriate time.	Noted, no further response required.

1.12 Folkestone and Hythe District Council

Table 1.11 Folkestone and Hythe District Council

Folkestone and Hythe District Council Comment	National Grid's Response
The Council does not have any comments on the above consultation, in accordance with your request dated 25/10/2022.	Noted, no further response required.

1.13 Forestry Commission

Table 1.12 Forestry Commission

Forestry Commission Comment	National Grid's Response
Thank you for consulting the Forestry Commission on this proposal. As the Governments forestry experts we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient \semi natural Woodland as well as other woodland. We are particularly concerned about any impact on Ancient Semi natural Woodland and will expect to see careful consideration of any impact and any weightings which might be applied to any assessments of route options/or site choice. This is because Ancient woodland is an irreplaceable habitat, they have high biodiversity and a long history with many heritage features remaining undisturbed. Paragraph 180 (c) of the National Planning Policy Framework states ; 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss' This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).	Noted, information and assessment on the location and importance of ancient woodlands is included within the **Application Document 6.10 Arboricultural Impact Assessment.** Information from the National Planning Policy Framework (NPPF) and the relevant National Policy Statements is included within the Arboricultural Impact Assessment.
The Sea Link Environmental Impact Assessment Scoping Report. Volume 1 Main Text. Part 2 Suffolk Onshore Scheme states on page 5, 2.1.5.6 that the Sub Station Site Options Area D and E include two ancient woodlands; Great Wood and Grove Wood.	Since production of the EIA Scoping report and the Suffolk onshore Scoping Boundary, the design has been refined and the draft Order Limits have been developed. The Proposed Project as described within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** has been used as the basis for the environmental assessments contained within the various technical environmental statement chapters. Information and assessment on the location and importance of ancient woodlands is included within the **Application Document 6.10 Arboricultural Impact Assessment.**
In addition Table 2.3.4 Suffolk Site Emerging Preferences on page 105, the same ancient woodlands could be impacted by cable installation. Similarly Table 2.3.6. Suffolk Site 3 Emerging Preference on page 110, and Table 2.3.7. Suffolk Site 3 Preference Alternative (Option 1) page 115 and (Option 2) on page 120 all state that the same ancient woodlands could be impacted by cabling.	No ancient woodland will be impacted by the Proposed Project. Further detail is provided within **Application Document 6.10 Arboricultural Impact Assessment.**
One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; being relatively undisturbed physically or chemically it is also a major seed bank. Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include: · damaging or destroying all or part of them (including their soils, ground flora or fungi) · damaging roots and understorey (all the vegetation under the taller trees) · damaging or compacting soil around the tree roots · polluting the ground around them · changing the water table or drainage of woodland or individual trees · damaging undisturbed archaeological features or heritage assets	No ancient woodland will be affected due to the scheme. Wherever possible veteran trees will be retained. Further detail is provided within **Application Document 6.10 Arboricultural Impact Assessment.**
It is essential that the ancient woodland identified is considered appropriately to avoid the above impacts that might be caused by routing cables, stock piles of construction materials. It is also essential that fuels, chemicals, or waste materials such as topsoil, minerals or hard-core are not stored on ancient woodland soils or under the woodland canopy, and due to the irreplaceable nature of ancient woodland most 'temporary' uses will result in irreplaceable damage. We particularly refer	No ancient woodland will be affected due to the scheme. Further detail is provided within **Application Document 6.10 Arboricultural Impact Assessment.**

Forestry Commission Comment	National Grid's Response
you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions	
Local Nature Recovery Networks (LNRNs) are now a key part of the Environment Act (2021), and reflects the role of ancient woodland within these wider networks. It is important to recognise their function within the wider local ecological network.	Where they have been identified at a local level the ability of the scheme to contribute to Local Nature Recovery Networks has been taken into account
Further Information	
In addition to protection of Ancient Semi natural Woodland the UK Forestry Standard (UKFS) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements. The UKFS has a general presumption against deforestation. Page 23 of the Standard states that: "Areas of woodland are material considerations in the planning process…."	Noted, no further response required.
In addition, lowland mixed deciduous woodland is on the Priority Habitat Inventory (England). This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the UK Post-2010 Biodiversity Framework but this priority status remains.	Noted, no further response required.
It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme. A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change. Woodland provides habitat for a range of Section 41 Priority Species including all bats.	Impacts to woodland features have been minimised as much as possible. This has included realignment to avoid them entirely or where this is not possible realignment to minimise tree loss. Where development works cannot avoid woodland features minimum width corridors have been employed. Further detail is provided within **Application Document 6.10 Arboricultural Impact Assessment.**
Included within that assessment should be an assessment of any woodlands under an existing woodland grant scheme and / or a felling licence agreement to ensure these agreements will not be negatively impacted and public money wasted.	National Grid would like to thank the Forestry Commission for bringing the presence of the English Woodland Grant Scheme to our attention. However, we understand that the scheme comprises a private agreement and therefore at this point in time National Grid do not hold the appropriate information to allow consideration of appropriate mitigation, although it is anticipated the landowner will be able to seek recovery of losses arising from delivery of the scheme through the compensation code as further details emerge.
Where woodland loss is unavoidable, it is expected that there will be significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones could include further tree planting or a mosaic of semi-natural habitats.	The landscape mitigation has been developed to consider the opportunities for local landscape and biodiversity enhancement which has included enhancing the woodland planting along the western and southern boundaries with native woodland planting to provide structural screening to the converter station. Refer to **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation.** All woodlands subject to tree survey have been given buffer zones in accordance with BS5837:2012 or standing advice where ancient woodlands are present and further information is included within **Application Document 6.10 Arboricultural Impact Assessment.**
For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities you must take into consideration the Root Protection Zone. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).	A detailed tree survey to BS5837 has been undertaken of the Order Limits and all trees (including their areas of constraint) in proximity to development proposals are considered within **Application Document 6.10 Arboricultural Impact Assessment.**

Forestry Commission Comment	National Grid's Response
Effective and practicable proposals for managing the boundary of the woodland and any likely increased access, proportionate to the degree of likely future access, planned or unplanned will need to be planned carefully and hedgerows and individual trees within a development site considered in terms of their overall connectivity between woodlands affected by the development.	All development proposals and future access requirements that have the potential to impact trees are considered within **Application Document 6.10 Arboricultural Impact Assessment.**
It is recommended that a mitigation hierarchy is applied with regard to all priority habitats including ancient woodlands. The hierarchy is :	Noted, no further response required.
The starting point should be a presumption against deforestation. Mitigation examples – dampening down tracks to minimise dust impacts in woodland, minimising lighting.	Noted, no further response required.
Ancient woodland cannot be compensated for, once it is gone it's gone forever and its loss should be avoided. However, if it is decided a development is necessary and that there will be loss of woodland (of all types) then compensation will need to be delivered. All loss of woodland should result in compensatory woodland.	No ancient woodland will be developed
Mitigation includes elements to reduce damage to woodlands that are not lost. The CIEEM Guidelines on Ecological Impact Assessment define Mitigation as 6.2 "Mitigation includes measures to avoid or reduce the negative impacts of a project, for example careful timing of an activity to prevent an impact occurring." And Compensation as 6.5 "Compensation describes measures taken to offset residual effects resulting in the loss of, or permanent damage to, ecological features despite mitigation"	Noted, no further response required.

1.14 Friston Parish Council

Table 1.13 Friston Parish Council

Friston Parish Council Comment	National Grid's Response
Introduction	
The Sea Link project is one of three projects being promoted by the National Grid Group to make connections at the proposed NG substation in Friston, which in itself was an NSIP included within the DCO Applications made by Scottish Power Renewables (SPR) for the East Anglia One North (EA1N) and East Anglia Two (EA2) projects. The proposed NG substation is more accurately described as a "connection hub" as this NSIP includes three large cable sealing ends at the same site plus realignment of the existing pylons involving the replacement of two pylons and one additional pylon. These DCOs were granted on 31st March 2022 but are currently subject to judicial review with the hearing taking place on 16 and 17 November 2022. Judgement is currently awaited. Should the judgement be to quash the grant of these DCOs the proposed NG connection hub will no longer have planning consent.	The proposed Friston Substation is located to the north of the village of Friston and to the south of the existing 4ZW and 4ZX overhead lines and cantered on Grid Reference TM4130961290 as illustrated on **Application Document 2.14.1 General Arrangements Plans - Suffolk.** Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position. For further details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Following the Examination of the EA1N, EA2 and the NG connection hub NSIP, the Examining Authority (ExA) issued its Recommendation Reports on 6 October 2021, one report for each of EA1N and EA2 with the NG connection hub included in each report. References in this document to the ExA report will be to the EA1N report as the reports are identical in all material respects.	Noted, no further comment required.
It should be noted that during the course of the examinations SPR sought to deny there was any certainty about the prospect of two or more other energy projects connecting at Friston. Further NG largely absented itself from the examination process despite one of the projects being examined being its own.	At the time of SPR's DCO submission for East Anglia ONE North and East Anglia TWO, the SPR substations (which included the NGET substation) there were no other planned connections into Friston. National Grid were not the parties submitting the DCO, however, information was provided to SPR to answer and questions in relation to any matters arising with regards to the NGET Substation.
In Volume 2 of this Report, Chapter 28, Conclusions on the Case for Development Consent on page 274, the ExA state at paragraph 28.4.5	Noted, no further response required.
"the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location."	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Paragraph 28.4.6 goes on to say: "In relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within 2 the existing development site have the potential to affect the proposed flood management solution), to landscape and visual impacts and to impacts on the historic built environment, should these arise from additional development proposals in the future.	A robust assessment of flood risk, landscape and visual effects and historic environment including built heritage assets has been prepared. Please refer to **Application Document 6.8 Flood Risk Assessment, Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** for full details. The FRA addresses all relevant forms of flooding, including surface water and

Friston Parish Council Comment	National Grid's Response
https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-009800-EA1NRecommendation%20Report-Vol2_Ch18-31%20COMPLETED.pd	groundwater, and describes secured measures for the management of surface water runoff to ensure no increase in this form of flooding during construction and operation of the Project.
It is clear from the Sea Link Scoping Report that NGET has not considered these substantial adverse effects at Friston and in fact is attempting to scope many of these issues out. This is unacceptable.	Since production of the EIA Scoping report and the Suffolk onshore Scoping Boundary, the design has been refined and the draft Order Limits have been developed. The Proposed Project as described within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** has been used as the basis for the environmental assessments which robustly assess the likely significant effects of the Proposed Project. Please refer to the relevant technical ES chapters for further detail.
Further the scoping report shows a disturbing lack of familiarity with key determinations set out in the ExA report. NG has drafted the scoping report as if key topics had not been the subject of detailed consideration in the EA1N and EA2 examinations as reflected in the ExA report. For example landscape issues arising from the extension of the NG connection hub, the noise environment at Friston and what is acceptable in terms of construction hours and noise. Friston Parish Council does not necessarily accept all the findings of the ExA but many areas of the EA1N and EA2 projects were improved from the original applications submitted by SPR. Accordingly it would be much more efficient for all concerned, and less of a burden on the local community, if NG used the topic positions determined by the ExA in its report as the starting position for the scoping report and its ES to which further improvements should be made to reduce environmental impacts.	The EIA Scoping Opinion provided by the Planning Inspectorate has been taken into account and has informed the scope of the assessment as reported on in the Environmental Statement (ES) submitted with the application for development consent. All environmental topics and issues specifically relevant to the Proposed Project with the potential to result in significant environmental effects have been assessed and reported on the ES in line with the EIA Regulations. Relevant information from other projects proposed in the area has been considered to the extent relevant to the Proposed Project. The design and Order Limits of the Proposed Project have developed since the submission of the EIA Scoping Report and further environmental baseline surveys and assessments have been undertaken and are reported on within the ES submitted with the application for development consent. Mitigation has been proposed as part of that process to avoid or reduce landscape, noise and other environmental impacts. These are provided in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**.
Friston Parish Council's Position	
Friston Parish Council ("FPC") opposes the onshore elements of the Sea Link, Eurolink and Nautilus projects in East Suffolk. It should be noted that these projects do not generate any renewable energy. Further they do not improve energy security for the United Kingdom or reduce prices for consumers. However without prejudice to this position of opposition FPC has the following comments on the scoping report. Please note that FPC has not had the benefit of expert planning law advice or the advice of relevant technical experts. Accordingly FPC reserves the right should these projects proceed to examination to raise issues in relation to the environmental impacts of these projects which have not been referred to in this report including without limitation where FPC has misunderstood or not appreciated the potential environmental impacts of the Sea Link project. Further FPC relies on its members providing their time voluntarily to consider these projects, a situation which has not been helped by the limited time available to consider the scoping report and which has been exacerbated by National Grid ignoring the advice of the Planning Inspectorate referred to further below. FPC endorses the comments set out in the email from SASES dated 7 November 2022	National Grid notes the concern raised. Please refer to **Application Document 6.2.1.4 Part 1 Chapter 1 Introduction** and **Application Document 7.1 Planning Statement and Application Document 4.2 Statement of Reasons** which outlines the needs case for the Proposed Project. Since production of the EIA Scoping report and the Suffolk onshore Scoping Boundary, the design has been refined and the draft Order Limits have been developed. The Proposed Project as described within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** has been used as the basis for the environmental assessments which robustly assess the likely significant effects of the Proposed Project. Please refer to the relevant technical ES chapters for further detail.
Projects being promoted by the National Grid Group ("NG")	
National Grid Ventures' (NGV) Nautilus Interconnector project held its initial Non Statutory Consultation in Friston and the surrounding area in October 2021. No Scoping Report has yet been submitted by NGV for this project. A joint meeting was held by the Planning Inspectorate with Sea Link and Nautilus on 20 June 2022 to discuss onshore coordination of these projects. a copy of the Meeting Note is attached as Annex 1 or at this link: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN020026/EN020026-	Noted, no further response required.

Friston Parish Council Comment	National Grid's Response
Advice-00005-1-220620%20SEA%20Link%20Nautilius%20Interconnector%20project%20update%20meeting%20note%20(Final).pdf	
NGV is also promoting its Eurolink Interconnector and began its Non-Statutory Consultation on 24th October 2022 to run concurrently with the Sea Link consultation. Both consultations are due to conclude on 18th December 2022. However, no Scoping Report has been submitted in relation to Eurolink.	Noted, no further response required.
(FPC notes the intention in the Meeting Note of 22 June for Sea Link, Nautilus and Eurolink to connect to the proposed Friston Substation i.e. the NG connection hub. FPC also notes the following on page 2:- "The Inspectorate advised the Applicant (i.e. Sea Link) to wait for the consultation period to close before submitting its scoping request."	Noted, no further response required.
National Grid has not therefore followed the Inspectorate's advice by submitting its Scoping Report on the day of the commencement of the Non-Statutory Consultation on 24th October 2022 with a deadline for responses of 22 November 2022, a month before the end of the consultation. FPC also refer to comments by PINS on 20 June 2022 as follows:- "The Inspectorate responded that considering the amount of consultation in the East Anglia region, the Applicant should be aware of what procedures can be taken forward in a combined matter to minimise resourcing pressures. Also, ensuring that parties understand the differences between projects, as well as the timelines between them is crucial for a successful consultation."	Noted, no further response required.
This advice has not been heeded and it now appears that FPC and other Councils will need to respond to each Scoping Report separately. This of course makes any assessment of cumulative impact of the three projects (in addition to the impacts of Sizewell C and the SPR projects) far more difficult for all stakeholders. Again this is unacceptable.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** The Environmental Statement includes an updated description of other developments (**Application Document 6.2.13.A Appendix 2.13.A Descriptions of Other Developments**), outlining the changes to construction timeframes of other projects.
What is even more concerning is the cavalier way National Grid has chosen to ignore the considered advice of the Planning Inspectorate. Subject to the outcome of the judicial review if these projects proceed National Grid's conduct so far does not bode well for the efficiency of the process for Sea Link, Eurolink and Nautilus.	Noted, no further response required.
FPC will however respond to the Scoping Report in so far as it is able at the present time given the consultation process is still going on, but will concentrate its comments on Volume 1, Part 2, the Suffolk Onshore Scheme, with emphasis on issues directly affecting Friston.	Noted, no further response required.
Site Selection	
NG has chosen a preferred landfall at Option S2 between Aldeburgh and Thorpeness despite this having numerous constraints in terms of nature conservation sites (SSSI and RSPB) and ground conditions which are extremely wet. No survey work has been undertaken to confirm that a trenchless technique is feasible. The choice of this landfall site is therefore premature and requires considerable consultation with the statutory bodies and extensive survey work.	Noted, further surveys and assessment work have now been carried out for the landfall locations, please refer to the relevant technical environmental assessments for details and **Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for additional details on landfall feasibility.

Friston Parish Council Comment	National Grid's Response
The preferred converter station site is at Option area E (Site 1) as shown in Figure 2.1.2. with a further option at Site 3 near Saxmundham. Site 3 requires considerably more disturbance with cabling than Site 1 and would likely require a construction access to be built from the B1121 in the environs of Hurts Hall (Listed Grade II) due to the constrained and congested access to the site. There is no plan provided showing where this new access road would be built.	Site 3 (shown on Figure 2.1.3 in the EIA Scoping Report Volume 3 Figures) has been selected over Site 1 following further review of the design since the submission of the EIA Scoping Report. All required accesses are included within the Order Limits. It is proposed to access the Saxmundham Converter Station site from the B1121 (via proposed bellmouth S-BM09) both during construction and operation as shown in **Application Document 2.7.1 Access, Rights of Way and Public Rights of Navigation Plans - Suffolk**. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The reasons for selecting Site 3 are provided within the Environmental Statement (ES) within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered.**
Site 1 would however require all traffic to follow the A1094, which is planned as access for the EA1N, EA2 and NG connection hub projects and would impact on residents of Snape, Friston and Aldeburgh in terms of increased traffic levels, including HGVs and general construction traffic.	The order limits have been updated and the access strategy is set out in full within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transpor**t and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
The Scoping Report describes both sites and cable-routes to be capable of co-ordination with two further projects (Eurolink and Nautilus). However Scoping Reports for these two other projects are not available. FPC is therefore handicapped in its response to the Sea Link project and cumulative impacts cannot be properly assessed.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Landscape and Visual	
Of particular concern is the proposed extension to the Friston Substation by a 50M bay for Sea Link. This will be in addition to the extensions proposed for the Nautilus and Eurolink projects which are shown in the National Grid Substation Extension Appraisal submitted in the EA1N and EA2 examinations, see: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-004690-ExA.AS32.D8.V1%20EA1N&EA2%20Extension%20of%20National%20Grid%20Substation%20Appraisal.pdf.	The parameters of Friston Substation are contained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which have been used within the Landscape and Visual Impact Assessment (see **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**). The consideration of both scenarios at Friston (Friston Scenario 1 and Friston Scenario 2) has been considered for both landscape and visual receptors within the Landscape and Visual Impact Assessment, refer specifically to **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment.**
NG states that the extension will be by a 50 metre bay which is presumably the width but do not set out what the length or height of that extension will be.	The Suffolk Onshore Scheme would not result in an extension to Friston substation. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the design details of the Proposed Project, the information contained in this chapter has been used as the basis for the environmental assessments which robustly assess the likely significant effects of the Proposed Project.
In its Scoping Report, Sea Link propose that the production of visuals showing the increased size of the NG substation to be scoped out. This is totally unacceptable, and it is essential that proper visuals of the extended NG substation are provided in order to assess the extent of the loss of mitigation landscaping provided for under the EA1N and EA2 consents as well as any further opportunity for planting and landscaping to mitigate the three new extensions.	The photomontages for the representative viewpoints are included at **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations** and include reference to Friston Scenario 1 (Friston Substation is constructed by Scottish Power Renewables (SPR), with the Proposed Project only needing to build a connection into it) and Friston Scenario 2 (Friston Substation if built as part of the Proposed Development)where appropriate to illustrate the potential changes under each scenario.

Friston Parish Council Comment	National Grid's Response
Visuals for other views are proposed at 1 year and 15 years. This is insufficient and there should be visuals provided at 5 years,10 and 20 years in addition.	The photomontages for the representative viewpoints are included at **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations** at year 1 and year 15. It is not considered to be appropriate to show visuals at 5, 10 and 20 years as these do not align to the assessment timescales and sufficient information is given in the material provided. It is considered disproportionate to show additional visualisations at years 10 and 20 as the change in vegetation growth is not considered to result in a material change to the assessment of effects.
In the ExA's Recommendation Report in relation to the SPR projects Volume 1, paragraph 7.5.58 (page 106) onwards, it discusses the Extension of National Grid Substation Appraisal and at para 7.5.60 it says:	Noted, no response required. Responses provided below.
"The ExA therefore consider that the extension of the NG substation would intensify and worsen the effects of the Proposed Development on both the local landscape and on visual receptors. The ExA also consider that the extension of the NG substation would have an adverse effect on the landscape through other effects. The western extension would remove land currently allocated for the proposed northerly SUDs basin. This would presumably need to be re-located elsewhere and enlarged to accommodate the increased physical footprint of the NG substation. Whilst not considered or sited in the Appraisal, it is reasonably self-evident that an enlarged SUDs basin in the landscape would have adverse landscape effect and potentially adverse visual effects too.	The Landscape and Visual Impact Assessment is set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** which considers the two scenarios at Friston (Friston Scenario 1 and Friston Scenario 2).
The proposed 5-year maintenance plan for planting is also wholly insufficient. East Anglia is an extremely and increasingly dry part of the country and the difficulty of establishing new planting is well-known. This plan is also completely inconsistent with the position in the Outline Landscape and Ecology Management Strategy accepted by the ESA for the NG connection hub together with EA1N and EA2 - see pages 48 – 50 which FPC still regards as inadequate given local knowledge about establishing and growing trees in this area. https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-005607- 8.7%20EA1N%20Outline%20Landscape%20and%20Ecological%20Management%20Strategy.pdf	Further detail on management measures, including adaptive management, can be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**. Landscape mitigation should be referred to within **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation.**
The Scoping Report states that the EIA is proposed to focus on the construction phase as the effects of the operational phase are not considered to be significant. This is wrong and both construction and operational phases should be equally considered. Arguably the operational phase is even more important since it is a permanent impact. Further such an approach is completely illogical as the purpose of the EIA is in part to determine whether or not environmental effects are significant	The Scoping Report states that the "LVIA of the landfall and underground cable corridors will be focused on the construction phase as operational effects are not considered to be significant". This is based on past experience with similar HVDC projects (accepted by decision makers) and professional judgement, as the landscape would be fully reinstated. The Landscape and Visual Impact Assessment includes an assessment of effects at all project stages for all elements of the Suffolk Onshore Scheme, included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
The converter stations and extensions to the NG connection hub are substantial buildings which will be incongruous in the tranquil rural landscape and the greatest sensitivity is required as identified by the ExA in its Recommendation Reports for EA1N and EA2.	The Landscape and Visual Impact Assessment includes an assessment of effects at all project stages for all elements of the Suffolk Onshore Scheme, included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
Sea Link's Scoping Report proposes that the Operational Lighting at the Converter station should be scoped out of the assessment. FPC disagrees with this proposal and the effects and control of any lighting should be properly assessed, including its impacts on ecology. Again this shows complete unfamiliarity with the ExA report – see paragraph 13.2 .118, second bullet on page 244 where the ExA states:	Potential effects associated with the proposed lighting on landscape character and visual amenity have been considered within the Landscape and Visual Impact Assessment, refer to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and impacts of lighting on ecological receptors have also been assessed within **Application Document Part 2 Suffolk Chapter 2 Ecology and Biodiversity.** For further details on the lighting associated with the Proposed Project, please refer to **Application Document Part 1 Introduction Chapter 4 Description of the Proposed Project.**

Friston Parish Council Comment	National Grid's Response
"The ExA concludes that important and relevant differences remain and resolved in the context of industrial sound sources introduced to Friston, a tranquil location with dark skies"	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 9 Noise and Vibration.**
Ecology and Biodiversity	
FPC is of the opinion that the landfall site between Aldeburgh and Thorpeness would be extremely detrimental to a wide range of wildlife and ecology and this must be thoroughly assessed by all relevant expert stakeholders, backed up by local knowledge and experience.	A full assessment of impacts on protected and notable wildlife is provided in the ES. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity.**
Friston currently enjoys a very rural landscape inhabited by a wide range of birdlife, bats, badgers, reptiles, insects etc. The proposal for three further industrial projects, in addition to those put forward by SPR, will yet further dramatically alter the balance of available habitats for wildlife. This has to be very fully and properly assessed.	A full assessment of impacts on protected and notable wildlife is provided in the ES. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**. An assessment of the cumulative effects of surrounding projects is also provided in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Cultural Heritage	
It would appear that Wood Farm, immediately adjacent to the proposed Site 3 near Saxmundham, has been omitted for the proposed assessment. Details of its Listing are to be found here: https://historicengland.org.uk/listing/the-list/list-entry/1231179	Potential impacts on Wood Farm are considered as part of the Cultural Heritage assessment within **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Maintenance and de-commissioning of the Project has been scoped out of the assessment in relation to heritage assets. This is inappropriate and these matters should be assessed.	Assessment detailed in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**.
Flooding	
This topic is of extreme concern to the village of Friston, which already has a history of flooding, particularly surface water flooding. The Scoping Report is ambiguous as to what forms of flooding are to be considered and assessed. It is vitally important that all forms of flooding, including surface water and groundwater flooding are fully and properly assessed. EN1 requires all sources of flooding to be considered including as part of site selection where the sequential test should be applied to all sources of flooding. NG seems to be unaware of basic policy requirements.	A robust assessment of flood risk has been prepared and is reported in **Application Document 6.8 Flood Risk Assessment.** The FRA addresses all relevant forms of flooding, including surface water and groundwater, and has been informed by regular engagement with the Environment Agency and LLFA.
The Scoping Report says at paragraph 2.5.5.2 "The. Suffolk Converter Station would be situated to avoid areas of Flood Zone 2 and 3. This would ensure that Project infrastructure 7 is safe from flooding and would also avoid permanent losses of floodplain storage or disruption to floodplain flow paths, so avoid permanent impacts on offsite flood risk". This is an incorrect assumption as simply avoiding Flood Zone 2 and 3 does not address areas of existing surface water flooding, which can have many causes. Pluvial flood risk must be properly taken into account in accordance with policy	A robust assessment of flood risk has been prepared and is reported in **Application Document 6.8 Flood Risk Assessment.** The FRA addresses all relevant forms of flooding, including surface water and groundwater, and describes secured measures for the management of surface water runoff to ensure no increase in this form of flooding during construction and operation of the Proposed Project.
Tables 2.5.2, - 2.5.6 (page 161 onwards) list the matters proposed to be scoped in or out of the EIA. Of the matters to be scoped out is "Increased surface water runoff from the converter station during operation" with the potential for significant effects reported as "NO – no impact pathway given attenuation of runoff". It is vital that surface water runoff from the converter station is properly assessed and details of any attenuation properly agreed assuming of course that the relevant site is compliant with policy.	Runoff from the converter station will be managed using suitable Sustainable drainage techniques and in line with a surface water drainage strategy that has been developed for the Proposed Project, the details of which are provided in **Application Document 6.8 Flood Risk Assessment.** This will ensure no increase in surface water flood risk in the local drainage catchment.
These tables also propose the scoping-out of the following matters in various locations:- • Increased flood risk due to permanent loss of floodplain storage/impediment of floodplain flows. • Permanent physical disturbance and change to flow regimes (watercourses). • Pollution of watercourses and physical disturbance during maintenance. • Temporary loss of floodplain storage/impediment of floodplain flow due to spoil storage during construction and decommissioning	Justification for scoping out these elements was provided within the Scoping Report, however, where the Planning Inspectorate disagreed, aspects have been scoped into the ES assessment, presented in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment.**

Friston Parish Council Comment	National Grid's Response
All these issues should be scoped into the EIA so that the full extent of any flooding from whatever source are properly examined. Again EN1 requires all sources of flooding to be considered including as part of site selection where the sequential test should be applied to all sources of flooding. NG seems to be unaware of basic policy requirements.	A robust assessment of flood risk has been prepared and is reported in **Application Document 6.8 Flood Risk Assessment**. The FRA addresses all relevant forms of flooding, including surface water and groundwater, and describes secured measures for the management of surface water runoff to ensure no increase in this form of flooding during construction and operation of the Proposed Project.
Geology	
The human health exposure to contaminants has been scoped out during operation and maintenance (page 195) with the reason "Not likely to result in a significant effect due to the nature of the project and the incorporation of the mitigation by design". Human health exposure to contaminants should be scoped in and properly assessed.	Human health exposure to existing contamination has been scoped into the assessment and has been assessed within the preliminary Contaminated Land Risk Assessment included within ES Appendix 2.6.A and 3.6.A.
The introduction of impermeable surfaces in terms of its effects in 'changes to groundwater levels and/or recharge rates' has also been scoped out, saying that it is "not likely to result in significant effects due to the small surface area of the built parts of the project. Any new areas of hardstanding would be designed to meet current drainage standards". This is unacceptable and changes to groundwater must be scoped in and properly assessed.	Changes to groundwater levels and/or recharge rates as a result of the introduction of impermeable surfaces during the operation of the Proposed Project has been scoped into the ES and is assessed within **Application Document 6.3.3.5.B Appendix 3.5.B Groundwater Risk Assessment.**
Agriculture and Soils	
The temporary removal of land from agricultural production is scoped out of the EIA assessment citing compensation agreements with landowners. It is important, 8 particularly in the context of a global food crisis resulting from the war in Ukraine, that landowners and the productivity of their land should not be excluded from the proper determination of the Sea Link project and therefore land use in the construction phase should not be scoped out regardless of compensation agreements and landowner consent.	The quality of the agricultural land (in relation to the Agricultural Land Classification system) has been assessed and reported in the ES for both the construction and operation phases. Please refer to **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils.**
At paragraph 16.5.11 of the ExA's report in respect of the SPR projects, it is stated that the ExA concludes that the local impact of the substation/National Grid infrastructure site in respect of land taken out of existing use is major adverse. Land at the Friston substation site is Grade 2 or 3 and is all BMV land and any extension to the NG substation will take further BMW land permanently out of agricultural production. As indicated above the global food crisis requires much greater weight to be placed on the loss of agricultural land particularly the best and most versatile agricultural land.	The quality of the land affected by the Proposed Project has been assessed and reported in the ES. Please refer to **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils**. An Outline Soil Management Plan has also been submitted, please refer to **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk.**
Traffic and Transport	
The Scoping Report states that access links will only be assessed if there is a 30% increase in traffic. NG propose to assign very low magnitude to traffic as there is expected to be fewer than 30 additional vehicle trips per hour. This cannot be a correct assessment of magnitude and is not considering the traffic impact cumulatively with the Eurolink and Nautilus projects or other projects in the area. It should be noted that there are proposed to be AILs involved in the construction of the Sea Link project.	The 30% increase in traffic is the threshold for determining a significant effect in accordance with the Institute for Environmental Management and Assessment (IEMA) Guidelines. The IEMA Guidelines include an assessment methodology for large loads.
There is no information on where vehicles will access the NG connection hub at Friston for construction works. Presumably an option would be via the new "operational" access road to be constructed off the B1121 between Friston and Sternfield under the SPR projects. Use of this access road would lead to increased traffic through the village of Friston and also along the very narrow winding road through Sternfield village which also requires the negotiation of a single lane humpback bridge.	The order limits have been updated and the access strategy is set out in full within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
The SR proposes that the distribution of workers is to be assessed on the 2011 Census, saying the 2021 census data is unavailable. The Census website reveals that its 2021 Phase 1 summaries were released on 28 June 2022 and all results will be published before 21 March 2023. Sea Link's	The construction staff distribution (see **Application Document 6.3.2.7.E Appendix 2.7.E Construction Worker Trip Distribution**) has been informed by 2021 Census data, which represents the latest information currently available and is considered to be appropriate for

Friston Parish Council Comment	National Grid's Response
distribution of workers should be re-assessed as soon as the 2021 information is available (if not already) so that reliable data is used.	informing the likely distribution of construction workers (as opposed to using information from the 2011 Census).
There is confusion in the Scoping Report as to how long construction is to take with the traffic section saying 2 years and the socio-economic section saying 4 years. The length of time shown in Table 1.4.A.1 on page 7 of the appendices containing the Outline Code of Construction Practice would suggest work will start in 2026 and finish in 2030. https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN020026/EN020026-000047-EN020026%20- %20Scoping%20Report%20-%20Volume%202%20-%20Appendices.pdf	The construction programme is clarified and set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
Air Quality	
Non-road vehicles are proposed to be scoped out of consideration for air quality. It is important that construction plant is properly considered regarding air pollution and also assessed cumulatively with other projects.	The assessment of air quality effects includes consideration of emissions from NRMM and is presented in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality.**
Emissions from Construction Traffic are also proposed to be scoped out on the basis that the numbers of vehicles are not high enough. That is incorrect and emissions should be properly considered both for the project and cumulatively with other proposed projects, including Sizewell C and the other NG projects in the area. There is also a possibility of cumulative impact with the SPR projects.	Traffic flows have been compared with the IAQM criteria and are summarised in Appendix 2.7.G Highway Impact Assessment. Full details of traffic data are located in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. All roads that exceed the IAQM criteria have been considered in the air quality assessment contained within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**.
Noise and Vibration	
Noise and vibration is an extremely complex technical subject as evidenced by the examinations for EA1N, EA2 and the NG connection hub. As noted above the ExA stated: "The ExA concludes that important and relevant differences remain and resolved in the context of industrial sound sources introduced to Friston, a tranquil location with dark skies"	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Operational Converter Station Noise Assessment**.
The ExA also stated at paragraph 13.2.113 of its report that: "Friston is a quiet area so the context must be considered in the respect of the introduction of new industrial sound sources" and "the noise level is measured at SSR9 are consistent with the inherently quiet rural noise climate of the Friston area"	Noted. Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D Appendix 2.9.D Operational Converter Station Noise Assessment.**
Firstly, it must be fully understood that Friston is an extremely quiet rural area with very low background noise levels in some cases below those which can be measured by commonly used acoustic equipment. Second in this context it is wrong to exclude any noise source in this environment and therefore the scoping report should ensure that all sources of noise both during construction and operation are fully considered	Noted. Noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration.**
Third, FPC does not accept any of the statements made in the scoping opinion concerning technical noise matters. The policy requirement is as set out in EN1 with which Sea Link will have to comply and all sources of noise should be considered accordingly.	Noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** in accordance with the requirements of EN-1.
FPC makes a few specific points below:- a. FPC notes that it is proposed to scope out switchgear noise in the operational stage. This is unacceptable as this impulsive noise is capable of waking people from their sleep (as given in expert evidence in the EA1N and EA2 Examinations) even though the ExA failed to consider this point, a matter which is at issue in the current judicial review It is important that the nature and significance of the impacts are properly understood. 10 b. The Scoping Report states the following "Modern switchgear of the Sulphur Hexafluoride (SF6) type operates with a "dull thud". There is no statement as to how loud the "dull thud" is. National Grid are well aware that SF6 is a potent 'greenhouse gas' contributing to climate change and its use has been	Points a to c, and e: Operational noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.3.2.9.D ES Appendix 2.9.D Operational Converter Station Noise Assessment** and considers switchgear and auxiliary plant. Point d: Construction noise impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** in accordance with current guidance. Point e: Construction vibration impacts are assessed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** in accordance with current guidance.

Friston Parish Council Comment	National Grid's Response
discontinued. SF6 is associated with gas insulated substations (GIS) whereas the Sealink project is proposed as an air-insulated substation not involving SF6. The comment made on modern switchgear of the SF6 type is therefore irrelevant and noise from switchgear must be assessed. c. With regard to the NG connection hub extension at Friston, it is important that the cumulative sound levels of the proposed NG connection hub plus EA1N and EA2 are also incorporated into the overall noise level. FPC notes from paragraph 2.10.7.20 that the aim of the project is to have a negligible effect and struggles to see how noise from the project can be kept below background noise, given the very low level of background noise in Friston. d. In respect of construction noise the scoping opinion again completely ignores the position which was reached in relation to the EA1N, EA2 and NG connection hub examinations. In relation to both noise and working hours the position in the EA1N and EA2 DCOs should be regarded as the starting point for construction noise impacts from which there should be further improvement in terms of lessening environmental impacts. The proposals for working hours and noise impacts in the scoping opinion are unacceptable. e. For example the Scoping Report also proposes to scope out auxiliary plant such as diesel generators and air compressors from the noise assessment. These produce a significant amount of noise and can be in use for long periods. For that reason the noise from plant should not be scoped out. This links with the proposed scoping out of emissions from Construction Traffic and Non-road Vehicles in the Air Quality section and both noise and emissions directly affect the health and well-being of people living in the affected areas. f. The assessment of vibration effect magnitudes at Table 2.10.7 is not acceptable. To suggest that a definition of a medium magnitude as " likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation has been given to residents (SOAEL)" is totally wrong. A level of vibration which leads to complaints cannot be described as medium magnitude. Residents should not be expected to tolerate that level of vibration, with or without warning or explanation	
Socio-economics, Recreation and Tourism	
The creation of permanent operation phase employment, training and apprenticeships has been scoped out on the basis that this is likely to be very limited. It is important that the lack of any meaningful jobs during operation is recognised and included in the assessment as this fact is pertinent in the planning balance.	Operational Employment has not been included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The level of employment generation in operation is explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The Assessment of Impacts and Likely Significant Effects included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** includes the employment and GVA generated by the Suffolk Onshore Scheme during the construction phase.
There is no information in the Scoping Report on the numbers of construction workers needed for this phase and whether it will be local or imported labour. This is said to become available in the PEIR. The numbers of workers and their accommodation must be assessed in conjunction with other projects, current or proposed, in the area as there is a danger of the communities being swamped by imported labour.	A complete assessment of socio-economics effects has been undertaken, including an assessment of construction workforce and accommodation capacity. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects which concludes no anticipated significant effects on the construction workforce and accommodation capacity as a result of the Proposed Project. A cumulative assessment has also been undertaken. This is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme**

Friston Parish Council Comment	National Grid's Response
	Inter Project Cumulative Effects which concludes no anticipated significant effects on the construction workforce and accommodation capacity as a result of the Proposed Project.
Health & Wellbeing	
Electromagnetic fields (EMFs) are proposed to be scoped out of the assessment. Stakeholders should have the opportunity to comment on this issue to ensure that any new information can be assessed as the project progresses.	This comment has been noted. No further response required
It is well known that substations/convertor stations can, and do, catch fire and the consequences for health and well-being of residents must be assessed. Further if a GIS option at the converter or NG connection hub were taken, then the use of SF6 gases would need to be considered in its impacts on climate change globally and the community locally.	It is assumed that no SF6 equipment will be used in the Proposed Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. Considering this reduced GWP to SF6 leakage emissions on similar transmission projects, it is likely that any leakage emissions associated with the Proposed Project will be minimal in the context of the overall footprint and will not affect the outcome of this assessment. These leakage emissions are therefore scoped out of the calculation The health, safety and wellbeing of the public, local communities and employees is National Grid's highest priority. Throughout the development of the proposals, National Grid has carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts of the construction and operational phases.
Cumulative Effects	
NG propose to include Sizewell C, EA2, Nautilus, Eurolink and EAG in their cumulative impact report (page 396 of the report). No mention is made of EA1N or of the proposed NG connection hub. EA1N and the NG connection hub at Friston should clearly be included. Neither are North Falls and Five Estuaries included in the list of projects to be considered cumulatively and they should rightly be included as there is the possibility they will connect to the Friston substation.	A full inter-project cumulative effects assessment for the Suffolk Onshore Scheme has been carried out for the Proposed Project and includes consideration of Sizewell C, EA1N & the NG substation, EA2, LionLink and Norwich to Tilbury (EAG). North falls and Five Estuaries have not been included in the Suffolk cumulative effects assessment as their onshore elements outside the ZOI for the Suffolk onshore scheme. A full inter-project cumulative effects assessment for the Offshore Scheme has been carried out for the Proposed Project and includes consideration of Sizewell C, EA1N, EA2, Nautilus, Northfalls, LionLink (previously EuroLink) and Five Estuaries. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies**. The Environmental Statement includes an updated description of other developments (**Application Document Appendix 2.14.A Descriptions of Other Developments**), outlining the changes to construction timeframes of other projects.
By way of reminder the ExA stated: "the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The

Friston Parish Council Comment	National Grid's Response
	assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within **Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**.
Conclusion	
The Sea Link project is being promoted by NG, however it fails to recognise the issues which arose during the Examination of EA1N and EA2, including the NG connection hub NSIP, or in the Recommendation Report issued by the Examining Authority. Indeed, some important issues which arose are proposed to be scoped out. The ExA found that the "utmost care" should be taken. The scoping opinion does not demonstrate care let alone "utmost care".	The EIA Scoping Opinion provided by the Planning Inspectorate has been taken into account and has informed the scope of the assessment as reported on in the Environmental Statement (ES) submitted with the application for development consent. All environmental topics and issues specifically relevant to the Proposed Project with the potential to result in significant environmental effects have been assessed and reported on the ES in line with the EIA Regulations. Relevant information from other projects proposed in the area has been considered to the extent relevant to the Proposed Project. The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.**
In this context the DCO process should not be treated as a "negotiating game" whereby NG puts forward an unreasonable position in the Scoping Opinion and any movement from that is regarded as NG demonstrating how fair and reasonable it is as a developer. This is a waste of time and resources for everyone. It is also unfair to local communities and local authorities who have limited time and resources as opposed to NG which has relatively unlimited time and resources.	Noted, no further response required.

1.15 Great Yarmouth Borough Council

Table 1.14 Great Yarmouth Borough Council

Great Yarmouth Borough Council Comment	National Grid's Response
Thank you for consulting Great Yarmouth Borough Council on the EIA scoping opinion pertaining to the proposed Development Consent Order for the 'Sea Link'. I can confirm that Great Yarmouth Borough Council does not have any comments to make on the above.	Noted, no further response required.

1.16 Historic England

Table 1.15 Historic England

Historic England Council Comment	National Grid's Response
Historic England has been notified about a scoping request for the proposed Sea Link electricity interconnector project by the Planning Inspectorate via an email (dated 25th October 2022). The Sea Link Project is a proposal by National Grid Electricity Transmission plc to reinforce the transmission network in the South East of England and East Anglia.	Noted, for full details of the Proposed Project please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
The Project is primarily required to reinforce the transmission network in the South East of England and East Anglia and accommodate power generated by renewable and low carbon energy generation schemes in East Anglia. We also note referral to expectation of additional interconnection with European neighbouring states.	For full details on the need for the Proposed Project please refer to **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction** and **Application Document 7.1 Planning Statement**.
The letter is accompanied by the seven volume Sea Link Environmental Impact Assessment Scoping Report (Volume 1 - 7 dated Oct 2022).	Noted, no further response required.
Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant in the scoping report.	Noted, no further response required.
We are aware that although not within the definition of a Nationally Significant Infrastructure Project (NSIP), a Paragraph 35 Direction under the Planning Act 2008 was granted by SoS Business, Energy and Industrial Strategy in March 2022 enabling this project to be determined under the Planning Act as an NSIP.	Noted, no further response required.
Furthermore, we note that although a cable project, such as Sea Link, is not identified within The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) which govern the EIA process for NSIP, it is clear that the Applicant considers the criteria in Schedule 3 to be applicable regarding the characteristics of the development and its location and will therefore produce an Environmental Statement. We support this approach.	Noted, no further response required.
Historic England Advice	
Our primary concern in relation to this proposal is the impact of the development upon the significance of designated heritage assets and non-designated heritage assets, both from construction and within the area surrounding the development. Our comments are set out in sections that correspond to the report structure. The two landfall areas and the marine cable elements will be dealt with separately (Parts 2-4).	Noted, responses are provided below.
Suffolk (Part 2)	
Paragraph 2.1.9.1 summarises the onshore scheme elements, include underground cables and the construction of a convertor station. Elements of the scheme may also require trenchless cable installation approaches to minimise impacts to significant areas, such as the AONBs, SSSIs and RSPB reserve.	Noted, for full details of the Proposed Project including details for trenchless crossings please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
It should be noted that all of these elements could directly impact the historic environment and we would recommend that appropriate evaluation measures are used to investigate and understand the potential and significance of the deposits that will be impacted, such as the development of deposit models, geophysical survey and intrusive investigations (boreholes, excavated trenches etc.).	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in **Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report,** and are provided in full within **Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers, Application Document 6.3.2.3.C Appendix 2.3.C Site Photos, Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report, Application Document**

Historic England Council Comment	National Grid's Response
	6.3.2.3.E Appendix 2.3.E Aerial Photography and LiDAR Report, Application Document 6.3.2.3.F Appendix 2.3.F Archaeological Evaluation Trenching Report (Draft) and **Application Document 6.3.2.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment.** The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment within **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Paragraph 2.4.3 (Study Area) the project uses 1km for scoping; this is proposed to be refined to 0.5km from the proposed Order limits for detailed baseline and 2km for setting assessment. The 2km buffer will only be used in relation to areas with above ground infrastructure.	Noted. No response required
Historic England supports the proposal to refine the study area from that used in the Scoping Assessment but cannot confirm if 2km is sufficient. The applicant should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	Noted. The final review of assets taken forwards for full assessment in relation to potential impacts on their setting was agreed through consultation with relevant stakeholders. This is details in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**), with the full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Paragraph 2.4.6.13 - This option for the route corridor includes scheduled monument 'Two bowl barrows on Aldringham Green' (LEN 1011378) within the corridor and is potentially located in the setting of two other monuments (Two bowl barrows in Square Plantation – LEN 1011376; and Bowl barrow on Aldringham Common – LEN 1011440). We recommend the temporary impacts on the setting of designated assets during construction are assessed as medium because of the frequency of assets	These assets were not taken forwards to full assessment due to their distance from the Suffolk Onshore Scheme.
Paragraph 2.4.6.15 - Temporary impacts on the setting of designated assets during construction should be assessed as medium. Again, this option for route corridor includes the scheduled monument of Leiston Abbey (second site) – LEN 1014520; which is adjacent to the corridor.	This asset was not taken forwards to full assessment due to its distance from the Suffolk Onshore Scheme.
Paragraph 2.4.6.16 - Temporary impacts on the setting of designated assets during construction should be assessed as medium as this option for the route corridor include the scheduled monument known as Two bowl barrows on Aldringham Green (LEN 1011378). The corridor is also potentially located in the setting of two other monuments (Two bowl barrows in Square Plantation – LEN 1011376; and Bowl barrow on Aldringham Common – LEN 1011440)	These assets were not taken forwards to full assessment due to their distance from the Suffolk Onshore Scheme.
Paragraph 2.4.6.5 summarises the permanent impacts that may occur during the construction phases, including physical damage and the changes to setting. We would recommend that the impact of the development on groundwater levels is also considered. Changes to groundwater levels may result in changes to the local preservation conditions, which in turn could lead to the damage and/or loss of vulnerable waterlogged archaeological remains that may be present within the development areas or in adjacent areas. This could include items such as wood, leather or palaeoenvironmental remains. If there is potential for the proposed work to impact groundwater levels, additional work may be required to understand the water environment, the nature and scale of any potential changes and how any impacts could be mitigated. We would therefore recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to for this issue (https://historicengland.org.uk/images-books/publications/preservingarchaeological-remains/).	Noted. Potential impacts resulting from changes to groundwater levels have been examined with the assessment undertaken by the hydrogeology team consulted as part of the baseline gathering and assessment process. A qualitative groundwater risk assessment is included within **Application Document 6.3.2.5.B Appendix 2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment** and **Appplication Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment** which includes an assessment on the potential for changes to groundwater levels and flow from dewatering.
Paragraph 2.4.7.1 - states that a Desk-based Assessment (DBA) will be produced, and that the findings of this work will be used to confirm whether any additional survey work is required. It would have been useful to outline here the sort of mitigation that may be required, such as geophysical surveys, borehole surveys and deposit modelling, Trial Trench evaluation excavations etc. We would expect to see the Written Schemes of Investigations (WSIs) for any elements of work.	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in **Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report,** and are provided in full within **Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers, Application Document 6.3.2.3.C Site Photos, Application Document 6.3.2.3.D Geophysical Survey Report, Application Document 6.3.2.3.E Aerial Photography and LiDAR Report** and **Application Document 6.3.2.3.F Archaeological Evaluation Trenching**

Historic England Council Comment	National Grid's Response
	Report (Draft). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**.
Paragraph 2.4.7.4 - We are pleased to see that geological mapping and borehole information held by the BGS will used to inform the DBA. We would recommend that this information, along with any other useful stratigraphic information (including archaeological and geotechnical data) is used to construct preliminary deposit models to the areas of the scheme that could then be built on as further assessments are carried out. The deposit model would help to illustrate the depth, characteristics and potential of the deposits of archaeological interest and should inform any subsequent evaluation trenching, borehole sampling and/or geophysical survey. The deposit model will also help to guide elements of the proposed mitigation strategy, such as the choice of geophysical techniques that are utilised.	An initial review of borehole data has been undertaken, including a review of Ground Investigation works undertaken as part of the Suffolk Onshore Scheme. This has been detailed in the baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**), and will form the basis of any further works that might be required. A more detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the higher potential for significant palaeoenvironmental remains to survive in this area. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report**, with the full report provided in **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment.**
We recommend that the Historic England document 'Deposit Modelling and Archaeology' (2020) is referred to: https://historicengland.org.uk/imagesbooks/publications/deposit-modelling-and-archaeology	Noted, no further response required.
We also recommend this report is prepared by a suitably qualified and experienced geoarchaeologist	Noted, no further response required.
Paragraph 2.4.7.4 – We support the proposed selection of the data sources to inform desk-based assessment.	Noted, no further response required.
Paragraph 2.4.7.5 – We support the need for walkover survey; however, it needs to be recognised that its usefulness 'to determine the potential for previously unrecorded heritage assets' is limited to above ground remains only (such as historic buildings and landscape features, historic routes, etc.). We recommend the assessment of potential for unknown buried archaeological remains in the ES should be informed by different survey methods. This should include geophysical surveys, trial trench evaluation, etc.	A number of surveys, including archaeological geophysical surveys, A programme of archaeological evaluation trenching, Ground Investigation (GI) works and site walkovers have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report for Suffolk (**Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**) and Kent (**Application Document 6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report**). Full details of the surveys are also provided in **Application Document 6.3.2.3.C** to **Application Document 6.3.2.3.F** for Suffolk and **Application Document 6.3.3.3.C** to **Application Document 6.3.3.3.G** for Kent. All survey works were undertaken in accordance with WSIs approved by the Suffolk and Kent County Council Archaeological Advisors. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessments (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
We recommend the walkover survey also include a Site Inspection of any heritage assets where a potential impact through changes to setting is identified; in order to inform the baseline setting assessment of heritage assets and impact assessment.	Noted. This has been undertaken with information gathered informing the baseline reports for Suffolk and Kent (**Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** and **Application Document 6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report** respectively), as well as the relevant Cultural Heritage assessments (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).

Historic England Council Comment	National Grid's Response
Paragraph 2.4.7.10 – Table 2.4.9 contains Very High Heritage Value to demonstrate assessment of effect, however table 2.4.7 identified High Heritage Value as the highest possible category of significance of a heritage asset. The criteria for assessment of effects should be clarified.	Noted and corrected.
We recommend that the Historic England document Preserving Archaeological Remains (2016) is referred to aid the discussions of the potential impacts to the historic environment as well as the approaches used to investigate them: https://historicengland.org.uk/imagesbooks/publications/preserving-archaeological-remains/	Noted.
The Historic England document Piling and Archaeology (2019) should be also referred to as some of the elements of the development may involve piling: https://historicengland.org.uk/images-books/publications/piling-andarchaeology	Noted.
Overall Historic England support the presented methodology and conclusions in Paragraph 2.4.8 that impact on the designated and non-designated heritage assets should be scoped in for all five options under consideration. The scheme as presented in the scoping report is consistent with the early pre-app discussions and we are continuing to engage with the applicant directly.	Noted, no further response required.
Paragraph 2.4.8.2 - The presence of previously unknown assets in the landscape has been demonstrated by other infrastructure schemes and is acknowledged here. We agree with this conclusion, but also recommend the scope of additional archaeological surveys is discussed and agreed with Suffolk County Council Archaeological Services	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (Application Document 6.3.2.3.A ES Appendix 2.3.A Archaeological Baseline Report, and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E** and **6.3.2.3.F.)** All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Paragraphs 2.5 & 2.6, and Part 2, Chapter 5 - It is noted that several Paragraphs within the scoping report contain information that may also aid the assessment of the archaeological potential of the development area, for example, information about the Geology and Hydrogeology.	Noted, no further comment required.
In particular, it is important to understand how changes to the groundwater levels, water quality or the movement of water through deposits may impact the historic environment by altering the preservation of archaeological structures, features or remains, including palaeoenvironmental remains. This may be caused by construction activities, the compression of deposits, the reduction in recharge values, the need to dewater areas during construction, or the creation of pathways for contaminants or oxygen (see Paragraph 2.6.6).	Noted. Potential impacts resulting from changes to groundwater levels have been examined with the assessment undertaken by the hydrogeology team consulted as part of the baseline gathering and assessment process. A qualitative groundwater risk assessment is included within ES Appendix 2.5.B and 3.5.B which includes an assessment on the potential for changes to groundwater levels and flow from dewatering.
Paragraphs 2.5 & 2.6 - Additional works are planned to investigate the geology and hydrology/hydrogeology of the development area; we would recommend that the value of this information to inform the assessment of the historic environment should be considered and discussed with the project archaeological team.	Noted. Discussions regarding aspects such as groundwater levels, hydrology, and geology have been held with relevant teams, and information has been incorporated into the baseline and assessment were relevant.
This will allow any opportunities to be maximised where possible, and it will also hopefully reduce any duplication of effort. For example, any intrusive works such as boreholes that are collected for ground investigation works or the development of a hydrogeological conceptual model (for example Paragraph 2.6.5.3) will potentially add to the understanding of the historic environment, as well as the likely preservation conditions that may be present on the site. The conceptual model will also add to the understanding of how the proposed development may impact the historic environment.	Noted. It should be noted that the original scope for monitoring of Ground Investigation works included archaeological monitoring of boreholes by a geo-archaeologist. This was, however, dropped due to the method of deposits retrieval being unsuitable for geo-archaeological assessment.
We agree that maintenance and decommissioning phases can be reasonably scoped out.	Noted, no further response required.

Historic England Council Comment	National Grid's Response
Kent (Part 3)	
Paragraph 3.1.9 summarises the onshore scheme elements, which include overhead lines and/or underground cables and the construction of a new convertor station. These elements could directly impact the historic environment and we recommend that appropriate evaluation measures are used to investigate and understand the potential and significance of the deposits that will be impacted. Appropriate techniques would include the development of deposit models, geophysical survey and intrusive investigations (e.g. boreholes and excavated trenches).	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E and 6.3.2.3.F**.) All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Paragraph 3.4.3 (Study Area) the project uses 1km for scoping; this is proposed to be refined to 0.5km from the proposed Order limits for detailed baseline and 2km for setting assessment. The 2km buffer will only be used in relation to areas with above ground infrastructure.	Noted, no further response required.
Historic England support the proposal to refine the study area from that used in the Scoping Assessment but cannot confirm if 2km is sufficient. The applicant should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.	Noted. The final review of assets taken forwards for full assessment in relation to potential impacts on their setting was agreed through consultation with relevant stakeholders. This is detailed in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**), with the full assessment in the Cultural Heritage chapter (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
In particular we would consider it a requirement to include an assessment of the potential for harm to the scheduled monument 'A Saxon Shore fort, Roman port and associated remains at Richborough' (1014642). Setting contributes quite highly to the significance of this site and although the monument is c. 2km away from the scoping boundary, the site is raised and has good visibility across the landscape. The LVIA recognises this potential through inclusion of a viewpoint near to the site (VP12).	The potential for impacts on the setting of 'A Saxon Shore fort, Roman port and associated remains at Richborough' (1014642) have been assessed as part of the Cultural Heritage assessment. This has included the production of heritage specific visualisations agreed in consultation with relevant heritage stakeholders. The results of the assessment are provided in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.**
3.4.4.3 (Baseline) Overall, we agree with the applicant's assessment, apart from Table 3.4.6 which is not complete and needs to be amended. It misses out potential significant effects scoped in in tables 3.4.1 and 3.4.2; namely temporary setting impacts during construction/from construction compounds on designated heritage assets.	Noted. Based on the final Kent Onshore Scheme temporary significant effects on the setting of designated assets are not predicted and therefore not included in the Cultural Heritage assessment.
Tables 3.4.1 and 3.4.2 - temporary impacts during construction and from construction compounds on the setting of heritage assets has been scoped in for designated heritage assets only. In our view this would need to include non-designated heritage assets. This is because currently the value of these heritage assets remains to be fully assessed and significant effects could result.	Noted. Based on the final Kent Onshore Scheme temporary significant effects on the setting of designated and non-designated assets are not predicted and therefore not included in the Cultural Heritage assessment.
We agree that maintenance and decommissioning phases can be reasonably scoped out.	Noted, no further response required.
Paragraph 3.4.6 summarises the impacts that may occur during the construction, operation, maintenance and decommissioning phases. These include physical damage and changes to setting. Given the location of the onshore works, within the former Wantsum Channel, we recommend that the impact of the development on groundwater levels is also considered.	Noted. Potential impacts resulting from changes to groundwater levels have been examined with the assessment undertaken by the hydrology team consulted as part of the baseline gathering and assessment process. A geo-archaeological assessment was also undertaken in this area. An overview of the results of this work is provided in the baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
Changes to groundwater levels may result in changes to local preservation conditions, which in turn could lead to the damage and loss of any vulnerable waterlogged archaeological remains present within the development areas or in adjacent areas. Such remains are rare and likely to be of	Noted.

Historic England Council Comment	National Grid's Response
considerable significance. This might include wooden structures and artefacts, leather or palaeoenvironmental remains.	
If there is potential for the proposed scheme to impact groundwater levels, additional work may be required to understand the water environment, the nature and scale of any potential changes and how any impacts could be mitigated. Therefore, we recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred-to (https://historicengland.org.uk/images-books/publications/preservingarchaeological-remains/).	Noted.
Paragraph 3.4.7 states that a Desk-based Assessment (DBA) will be produced, and that the findings of this work will be used to confirm whether any additional survey work is required. It would have been useful to outline here the sort of survey that may be appropriate. Deposits of archaeological interest are likely to lie below the depth of standard geophysical survey across parts of the Minster Marshes and within the Head deposits on the valley side, as well as within Pegwell Bay.	Noted. A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
Standard geophysical survey and evaluation trenching will be appropriate for relatively shallow archaeological remains. However, boreholes and deep penetrating geophysical techniques are recommended where more deeply buried remains might be expected. Results should be informed-by and feed back into deposit models, to map the distribution and character of the buried deposit sequence. We would expect to be consulted on the Written Schemes of Investigations (WSIs) for any elements of work.	Noted A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
Paragraph 3.4.7.4 - We are pleased to see that geological mapping and borehole information held by the BGS will used to inform the DBA. We recommend that this information, along with any other useful stratigraphic information (including archaeological and geotechnical data) is used to construct a preliminary deposit model for the on-shore route.	A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in A**pplication Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
The deposit model will help to illustrate the depth, characteristics and potential of the deposits of archaeological interest and should inform any subsequent evaluation trenching, borehole sampling and/or geophysical survey. We recommend that the Historic England document 'Deposit Modelling and Archaeology' (2020) is referred to: https://historicengland.org.uk/imagesbooks/publications/deposit-modelling-and-archaeology/. The KCC HER officers should also be contacted for relevant geoarchaeological reports from nearby sites that have provided information relevant to deposit modelling for the proposed scheme.	Noted A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
As before we recommend this element of the application is prepared by a suitably qualified and experienced geoarchaeologist.	Noted A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, with the full report provided as **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
Paragraph 3.4.7.5 noted the use of an archaeological walkover survey. This should just be a 'walkover survey'; reason: built heritage assets may be identified.	Noted

Historic England Council Comment	National Grid's Response
The Walkover Survey should also include a Site Inspection of any heritage assets where a potential impact through changes to setting is identified; in order to inform the baseline setting assessment of heritage assets and impact assessment	Noted. This has been undertaken with information gathered informing the baseline reports for Suffolk and Kent (**Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** and **Application Document 6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report** respectively), as well as the relevant Cultural Heritage assessments (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
We also recommend that a programme of archaeological evaluation is undertaken in consultation with the LPA archaeological advisor at an early stage in the process. Preferably to inform the EIA.	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.3.3.B, 6.3.3.3.C. 6.3.3.3.D, 6.3.3.3.E, 6.3.3.3.F and 6.3.3.3.G**). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**)
Several other paragraphs within the scoping report contain information relevant to archaeological potential, for example: Water Environment (3.5): as well as Geology and Hydrogeology (3.6).	Noted.
We therefore recommend that any additional works planned to investigate the geology and hydrology/hydrogeology of the development area (Paragraphs 3.5 & 3.6) should be discussed with the project archaeological team. This will allow opportunities to be maximised, reducing duplication of effort. For example, boreholes collected for ground investigation works or the development of a hydrogeological conceptual model will potentially add to the understanding of the historic environment, as well as the likely preservation conditions that may be present on the site.	Noted. Discussions regarding aspects such as groundwater levels, hydrology, and geology have been held with relevant teams, and information has been incorporated into the baseline and assessment were relevant.
A hydrogeological conceptual model will also add to the understanding of how the proposed development may directly or indirectly impact the historic environment, by changing the water environment and as a result the state of preservation of buried archaeological remains.	A qualitative groundwater risk assessment is included within ES **Application Document 6.3.2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment and Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment** with baseline information presented within **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology & Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology** which has been used to inform the development of a conceptual model which informs the risk assessment.
Marine Environment (Part 4)	
We concur with the topics to be scoped into the EIA exercise for this proposed development	Noted, no further response required.
We recommend that a draft archaeological Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries accompanies any Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES);	An outline WSI with detail regarding the Protocol for Archaeological Discoveries is included as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** as **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
The draft Development Consent Order should provide for survey programmes conducted post-consent (should permission be obtained), but precommencement of any construction activities should be informed by archaeological advice through an agreed WSI.	Post-construction monitoring is detailed within the outline WSI submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** as **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
We understand that the proposed development will be located wholly within English Territorial Waters and spans the East Inshore and South East Marine Plan Areas. We also appreciate the objective regarding 'Avoidance of known wrecks and areas of archaeological importance'	Impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**.

Historic England Council Comment	National Grid's Response
Paragraph 1.4.3.48 describes the possible use of cable installation requiring up to four trenches across the foreshore, each approximately 3m wide and between 1m and 5m deep depending on sedimentary conditions. It is also explained that temporary work structures might be required within the intertidal zone, which could be cofferdam or sheet-piled structure, installed using vibratory piling or percussive piling to achieve design depth. Acknowledgment regarding 'additional mitigation' is therefore important.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. Further information is presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**). Detailed installation methodologies at landfall are presented in detail in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** Additional mitigation as required is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
Paragraph 1.4.3.54 describes installation of marine HVDC cables as requiring ground preparation within the intertidal zone at the preferred landfall sites; and pre-lay seabed preparation along the route below MLWS, such as route clearance, pre-lay grapnel run and any pre-sweeping.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. Further information is presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**)**.** Detailed installation methodologies at landfall are presented in detail in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** Additional mitigation as required is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
Paragraph 1.4.3.55 provides detail regarding survey techniques to be employed, inclusive of Multi-Beam Echo Sounder (MBES), Side-Scan Sonar (SSS), Sub-Bottom Profiler (SBP), Magnetometer, visual inspection and geotechnical. While we appreciate the importance to this project of route clearance, as explained in paragraph 1.4.3.56, the completion of a Pre-Lay Grapnel Run (PLGR) must only occur after archaeological analysis of survey data has been completed and reported within a timeframe whereby such information informs optimum route selection and burial.	A full suite of marine geophysical surveys will be undertaken along the entirety of the route prior to the PLGR; the results are presented in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**. The PLGR is discussed in the outline WSI, submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** as **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
Paragraph 1.4.3.57 mentions pre-sweeping through 'areas of large sand waves' and we consider it important to highlight necessity for prior sub-bottom archaeological assessment to determine the presence of any presently concealed sites of known or possible archaeological interest.	A full suite of marine geophysical surveys will be undertaken along the entirety of the route prior to the PLGR; the results are presented in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**. The PLGR is discussed in the outline WSI, submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** as **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
Regarding the attention given to the risk of this project encountering Unexploded Ordnance (UXO), we note the attention given to a desktop study to assess risk of UXO and corroboration with geophysical and geotechnical seabed survey undertaken in 2021.	A full suite of marine geophysical surveys will be undertaken along the entirety of the route prior to the PLGR; the results are presented in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report.** The PLGR is discussed in the outline WSI, submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** as **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
Paragraph 1.4.3.59 - the attention given to 'micro-routing' is also relevant to archaeological risk and we encourage optimisation of data use to select a preferred route and design (e.g. four cables installed within two trenches).	Impacts to marine archaeology along with recommended mitigation measures are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
However, we note a statement in paragraph 1.4.3.62, that if laid separately the gap between cables could be 30m to 60m depending on water depth, it is therefore important that all survey work and subsequent analysis includes all impacted seabed areas.	Impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** and assessment covers the entire Orders Limits area.
It is also apparent that other vessels may be required such as a Cable Lay Barge and Jack-Up platform (paragraph 1.4.3.64) when close inshore, it is therefore important that all survey work and subsequent analysis includes any seabed area that could be impacted by anchoring as might be required by these barges and/or platforms.	Impacts to marine archaeology along with recommended mitigation measures are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
Chapter 4.7 (Marine Archaeology) Historic England broadly supports the approach taken in the report	Noted, no further response required.

Historic England Council Comment	National Grid's Response
Paragraph 4.7.4 (Baseline Conditions), and paragraph 4.7.4.2 alludes to the known and presently unknown archaeological resources as might be encountered by this proposed project. Regarding the reference made to wreck recording through surveys conducted by the UK Hydrographic Office, it is important to highlight that these surveys will be focussed towards navigationally important routes. We therefore concur with the statement that there is potential for wreck, especially older and highly dispersed sites, to be discovered outside of defined navigation areas.	The potential for currently unknown archaeological features is addressed in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report.** Impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
The detail provided under 'UKHO records within the study area', 'NMHR records within the study area' and 'Suffolk records within the study area' provide important desk-based sources of information e.g. 151 records relating to possible shipwreck events and seven records relating to possible aircraft crash sites.	The archaeological baseline is addressed in **Application Document 6.3.4.6.A Appendix 4.6.A Appendix 4.6.A Marine Archaeological Technical Report.** Impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
Paragraphs 4.7.4.23 and 4.7.4.24 - The detail provided under 'Historic Seascape Characterisation' would need to be updated in any subsequent PEIR and ES as the data pre-dates the production of the national Historic Seascape Characterisation (HSC) consolidation in 2018. It is therefore necessary in the preparation of the PEIR and ES to use: https://archaeologydataservice.ac.uk/archives/view/seascape_he_2018/index. cfm.	The 2018 HSC consolidation project has been utilised in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**. Impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
Paragraph 4.7.5 (Embedded and Control & Management Measures) – the description of 'embedded mitigation measures' includes the spatial identification of Archaeological Exclusion Zones (AEZs), which we appreciate can be identified as an embedded mitigation.	AEZs are detailed within **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI)**, submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
The inclusion of geophysical and geotechnical survey data acquisition is however not embedded mitigation per se (vis. definition of embedded mitigation as included in the glossary in Volume 1, Part 1). It is important that geophysical data acquired pre-consent should be subject to analysis and interpretation by an accredited, professional and experienced archaeological contractor and used within the PEIR and ES. Mention is made of using those data derived from geophysical or geotechnical surveys undertaken post-consent and post-construction.	A full suite of marine geophysical surveys will be undertaken along the entirety of the route prior to the PLGR; the results are presented in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report.** The PLGR is discussed in **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI),** submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**
It is also important to clarify that such archaeological assessment and reporting procedures must be adequately provided for in any draft Development Consent Order (including Deemed Marine Licence) that supports any eventual application to the Planning Inspectorate. We would also recommend that archaeological specialists are included in the design of any geophysical or geotechnical/geoarchaeological survey campaigns to ensure that opportunities are maximised where possible.	This is addressed in the Control and Management Measures section of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** and within **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI)**, submitted as an appendix to the ES chapter.
We therefore consider such measures to represent adaptive mitigation, especially survey campaigns conducted post-consent and pre-construction, as they should allow the project to be designed and delivered in full consideration of presently unknown elements of the historic environment which might be discovered.	This is addressed in the Mitigation Measures section of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES.
Paragraph 4.7.5.4 We note the statement made here regarding palaeogeographic features such as palaeochannels as may occur in the proposed development area and further investigation of existing geotechnical samples or undertaking further samples. However, we are aware that loss (discarded) of geotechnical vibro-cores of archaeological interest has already occurred and that if consent is obtained that any subsequent geotechnical survey will need to be conducted in the same locations as previously identified of high and medium priority status.	An additional geotechnical survey to duplicate to destroyed cores will be undertaken in Summer 2024, and will be submitted as a standalone document when completed.
We would also recommend that geoarchaeological specialist are included in the design of any future sampling campaigns, and that they are allowed direct access to the cores to record them. This is because it is better to record and assess continuous core sequences rather than isolated deposits as this allows for greater reliability and confidence in the resulting conclusions.	The methodology for the geotechnical survey is presented in the Method Statement for Geoarchaeological Assessment of Geotechnical Site Investigations (Wessex Archaeology 2023, report ref. 244370.01) and has been approved by Historic England.

Historic England Council Comment	National Grid's Response
Paragraph 4.7.5.7 (Anomaly investigation) mentions methods for ground truthing assessment and we encourage coordination with UXO investigation campaigns.	This is addressed in **Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report** and the outline WSI (**Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI)**) which are included as part of the ES submission.
Paragraph 4.7.5.9 describes watching briefs in the intertidal or marine areas with a methodology presented in a method statement for consultation with Historic England and the MMO. However, for any and all watching briefs conducted in an intertidal area, the primary consultee will by the respective local authority curatorial bodies that serve Suffolk and Kent.	This is addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES.
Paragraph 4.7.5.10 (Reduction of indirect impacts) states that 'Once the design of the Offshore Scheme has been confirmed, it may be possible to ascertain measures to protect heritage assets that could be indirectly impacted.' However, we take this opportunity to refer you to Volume 1, Part 1, paragraph 1.2.2.8 which quotes Part 5 of EIA Regulations 2017 regarding indirect significant effects.	Both direct and indirect significant effects are considered within **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES, along with the recommended mitigation measures.
We also draw your attention to paragraph 1.5.4.6 and action to determine the significance of the residual effects, inclusive of indirect effects. It therefore seems appropriate that in order to effectively confirm the design of the proposed project that such indirect impacts are assessed in the PEIR and ES, and the project designed accordingly to avoid impact.	The significance of the residual effects of both direct and indirect impacts are considered within **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES, along with the recommended mitigation measures.
We also refer you to the provisions to assess indirect impacts within the Overarching National Policy Statement for Energy (EN-1), e.g. paragraphs 4.2.1 and 4.9.3 and National Planning Policy Framework (2021) e.g. paragraph 203.	Indirect impacts to marine archaeology are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** of the ES and both En-1 and the NPPF documents are considered within this assessment.
Paragraph 4.7.5.11 (Control and Management Measures) includes 'MA01 – a Written Scheme of Investigation (WSI) including a Protocol for Archaeological Discoveries (PAD)'. We note that the scoping document refers to 'method statements' (paragraph 4.7.5.9) and also 'management measures'. It is therefore important that the PEIR and ES adopts a consistent terminology, which should be achieved through consultation with Historic England.	Management measures' are a form of mitigation addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**, whilst 'method statements', included in the mitigation section of the ES, are documents to provide detailed methodology for a package of development/survey works.
We also note the statement that the 'WSI would address unavoidable impacts associated with the worst-case scenario (Rochdale Envelope)'. However, the definition of 'Rochdale Envelope' used in the glossary (Volume 1) focusses on the benefits to the Applicant of a flexible approach i.e. 'some details of a project have not been confirmed'. Such matters and the approach to conducting an EIA exercise for this proposed development must be made clear in the PEIR and ES.	This is addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES.
We also recommend any marine geophysical or geotechnical surveys or other visual inspection surveys that occur post consent, should permission be secured, are to be assessed by a suitably qualified, experienced and accredited marine archaeological consultant in accordance with an agreed WSI and accompanying method statements.	This is addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** of the ES and in **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI).**
We also concur with 'MA02' whereby the WSI will detail the methodological approach to offsetting impacts by completing a palaeo-environmental assessment of deposits of high geoarchaeological potential which may be disturbed.	This is addressed in **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI),** submitted as an appendix to **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.** Any paleoenvironmental assessment results that are completed are presented in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**. Additional paleoenvironmental results for vibrocores obtained in Summer 2024 will be submitted as a standalone document and not part of the main ES submission.
We also agree with the matters as referenced MA03, MA04 and MA05. Regarding MPE01 (abandoned, lost or discarded fishing gear), we encourage the applicant to ensure that their archaeological consultant or retained archaeological advice service is directly involved in survey	This is addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** in the ES and will be included in relevant archaeological method statements relating to survey campaigns whereby archaeological material may be encountered.

Historic England Council Comment	National Grid's Response
campaigns and data assessments to ensure, where possible, 'wreck' of possible or known archaeological interest can be avoided and left in-situ.	
Paragraph 4.7.6 (potential for significant effects) – we concur with Table 4.7.4 (sources and impacts) and the scoping in of the identified impacts. Paragraph 4.7.6.9 describes Table 4.7.5 as providing a summary of the impact pathways which are to be 'scoped into and or out of the benthic ecology assessment.' It is taken that this is an error and that referral should be to the marine archaeological assessment within any PEIR and ES to be produced. Overall, we concur with the matters to be scoped in as listed in Table 4.7.5.	This error was amended in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Marine Archaeology** of the PEIR and will not be present in the **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Marine Archaeology** of the ES.
Regarding the inclusion of Historic Seascape Characterisation, we encourage the Applicant to focus assessment, ideally through a narrative approach, on deriving a perception of historic character by using the 2018 national database for the purposes of determining the capacity to accommodate change as proposed by this development. We make this point as it is not the same as equating change to impact per se and whether there is temporarily or permanently change in historic character as presently perceived.	The capacity of the historic seascape character to accommodate change is addressed in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report** which is included as part of the ES submission.
Paragraph 4.7.7 (proposed assessment methodology) – to enable an ES to be produced, further consideration is needed regarding additional coring as could be required to supplement the geoarchaeological evaluation of existing vibrocore logs. The seeking of 'grey literature' should include The Online System	Additional marine geotechnical surveys are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** of the ES and in **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (WSI)**, submitted as an appendix to the ES chapter for **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Marine Archaeology**. The methodology for the survey is presented in the Method Statement for Geoarchaeological Assessment of Geotechnical Site Investigations (Wessex Archaeology 2023, report ref. 244370.01).
We also take this opportunity to confirm that the HSC exercise is to use the 2018 dataset (as referenced above) as necessary to supplement the individual HSC reports as referenced.	The 2018 HSC consolidation project has been utilised in Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report. Impacts to the historic seascape character are addressed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**.
Paragraph 4.7.8 provided a summary which demonstrates the attention given to available desk-based sources of information within the Historic England National Marine Heritage Record (NMHR) and the attention given to actual identifiable sites as well as the potential resource. The acknowledgement of the potential for entirely new discoveries is particularly relevant in consideration of the geographic location of this proposed development in reference to prehistoric, maritime and aviation (vis. Control and Management Measure MA05).	The known and potential baseline resource is addressed in **Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report**, which is included as part of the ES submission.
We concur with the summary provided in Table 4.7.9 (proposed scope of the assessment) and the identification of potential significant effect at each defined project phase which are to be scoped into the assessment.	The comment is noted and the table of proposed scope of the assessment is included in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** of the ES.
Summary	
Overall, we are content with the applicant's approach to sources, baseline information and the assessment of heritages impact. We confirm however that historic environment represents a potentially significant issue in EIA terms, and confirm that the historic environment should be 'scoped in' to the assessment.	Noted, no further response required.
We note the applicant intends to produce an LVIA. We recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Ideally though a separate heritage viewpoints appendix should be produced.	Heritage specific viewpoints and accompanying visualisations are contained in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**

Historic England Council Comment	National Grid's Response
The setting of heritage assets is not however just restricted to visual impacts and other factors should also be considered in assessments; in particular noise, light, traffic. Where relevant, the cultural heritage should also be cross-referenced to other relevant chapters, and as above we advise that all supporting technical heritage information is included as appendices.	Noted. These aspects have all be considered as part of the assessment of potential impacts on the setting of heritage assets.
We strongly recommend that the applicant involve the County Councils specialist advisers on archaeological matters and we recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; and of any required mitigation measures. Likewise, the local Conservation Officer will need to be consulted in relation to the built environment.	Noted Consultation with the relevant archaeological advisors and conservation officers has taken place with regular thematic group meetings as well as specific project meetings as and when required. This has included agreeing works such as the geophysical survey and evaluation trenching, as well as the locations for the visualisations required for the setting assessment.
Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter.	Noted
The ES should also use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them. Alongside appropriate mitigation to offset adverse effects on heritage assets we are also looking for explicit and demonstrable heritage enhancements and benefits from the scheme to be set out clearly in the application. This could include Interpretation, public engagement in the archaeological discoveries, heritage education and heritage focus in relation to design and placemaking.	Noted. This has been taken into consideration as part of the assessment when relevant.
Given the designated heritage asset within the area, we would welcome further discussions with the applicant in order to refine the approach to the scope of the ES, to the assessment, enhancements and mitigation.	All designated assets now fall outside of the Order Limits for both the Kent and Suffolk Onshore Schemes. However, due to the nature of the Proposed Project, regular consultation has been undertaken with heritage stakeholders including Historic England.
Recommendation	
We broadly accept the approach set out in the scoping report, but we have some concerns that would need to be addressed. These are set out in the specific bullets above. We consider further refining of the scope would be necessary taking these comments into consideration. This is to fully address heritage matters and to fully consider the impact on the historic environment in relation to policy.	Noted
We confirm the historic environment represents a potentially significant issue in EIA terms, and we would support the need for further work to support the publication of an ES.	Noted

1.17 JNCC

Table 1.16 JNCC

JNCC Comment	National Grid's Response
Thank you for your e-mail and consultation request. Upon reviewing this Sea Link proposal JNCC has identified the route to be entirely inshore (within territorial limits) and therefore not within our remit. As such defer to Natural England for all comments regarding nature conservation advice including any related to the Southern North Sea SAC and Outer Thames Estuary SPA.	Noted, no further response required.

1.18 Kelsale-cum-Carlton Parish Council

Table 1.17 Kelsale-cum-Carlton Parish Council

Kelsale-cum-Carlton Parish Council Comment	National Grid's Response
Kelsale-cum-Carlton Parish Council has been identified by the Planning Inspectorate as a consultation body that must be consulted before adopting its scoping opinion. As such, we are writing to inform the Planning Inspectorate of information we consider should be provided by National Grid in the Environmental Statement.	Noted, no further response required.
Alternative locations for the onshore substation – National Grid has failed to provide any analysis whatsoever of alternative sites other than the Sizewell area of the Suffolk Heritage Coast, including brownfield sites, in its voluminous scoping report. It is assumed that this is the only option that makes sense and that there is no other option, but no justification is given except the implication that it is less expensive and more convenient. Other sites, such as brownfield sites, must be examined and properly considered in the ES given that the scoping boundary includes part of the Suffolk Coasts and Heath Area of Outstanding Natural Beauty (AONB), Sandlings Special Protection Area (SPA) and Sizewell Marshes Sites of Special Scientific Interest (SSSI). Further, National Grid goes on to list several other international and national designations as well as non-statutory designated sites of importance in this area. A thorough investigation of other sites must be done so that the Planning Inspectorate can properly consider all options rather than relying solely on National Grid's assumptions.	In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report.** Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Cumulative impacts of the now 9 energy projects in this area – Whilst National Grid has addressed cumulative impact in its scoping report, its analysis is insufficient and does not fully illustrate the scope of industrialisation of the area. There is no holistic visualisation of how the massive onshore substations proposed by both National Grid and Scottish Power will change the landscape in this tiny area of the Suffolk Heritage Coast. This visualisation must form part of the ES so that cumulative impact can be thoroughly assessed by the Planning Inspectorate.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** The cumulative effects relating to the landscape character and visual amenity are set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** The visualisations of the Suffolk Onshore Scheme are set out within **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations**.
Size and scale of the onshore substation – The size and scale of the onshore substation is addressed, but only in isolation. Together with the other proposed onshore substations, size and scale will have a massive impact on the landscape and the environment and must be addressed in its totality.	Cumulative landscape and visual effects are presented in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

1.19 Kent County Council

Table 1.18 Kent County Council

Kent County Council Comment	National Grid's Response
Thank you for consulting Kent County Council (KCC) on the Environmental Impact Assessment (EIA) and Scoping Report for the Sea Link project. The County Council is responding separately to the Non-Statutory Consultation and will provide comments direct to the Applicant on the 16th December 2022.	Noted, no further response required.
The County Council has reviewed the document and for ease of reference, has provided comments structured under the chapter headings within the Scoping Report. The response largely focuses on the onshore infrastructure that is being delivered as part of this scheme.	Noted, no further response required.
1.3 Main Alternatives Considered	
Heritage Conservation: Due to the rich archaeological landscapes of Thanet, on 8th February 2022 the County Council, from a heritage conservation perspective, expressed a preference for a landfall area in Pegwell Bay (Option K1) and a converter site located in and around Richborough/Cliffsend (Option A), in a consultation on the emerging preferences for the project. Although a landfall area in Pegwell Bay (Option K1) may have more intertidal impacts on archaeological assets, this is preferred to the other options which included a landfall area between Broadstairs and Margate (Option K1a) and on the north Kent coast (Options K2-K5) that would have required an extensive connection that runs through rich archaeological landscapes. A converter site located in and around Richborough/Cliffsend (Option A) was also preferred given the reduced connection cabling and less likely overall impact. The County Council has drawn attention to the high archaeological and historic landscape value of the area associated with this option.	Noted, for further details on the alternatives considered please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
1.4 Description of the Project	
Heritage Conservation: The County Council notes the description of the works involved for each of the elements within the Kent Onshore and Offshore areas. The works involve 10 hectares of land for the construction of the convertor station and 40m to 60m working widths and trenching areas for the cabling. The convertor station may be up to 30m high and pylons may be included in the scheme. These works will be taking place in an area that is highly sensitive for archaeological remains, both those that are found as buried archaeological landscapes and others that are extant as earthworks and built heritage. Other remains will be found in marine and intertidal areas and may include wrecks and structures as well as submerged sites	Noted, for further detail in relation to built heritage and archaeology please refer to **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.**
KCC recommends that a thorough study is needed to establish a detailed baseline and to understand the significance of the archaeology of the area. This would need to be supported by survey and evaluation targeted at the potential impacts of the scheme, including areas of potential temporary and enabling works. As a principle, the County Council encourages minimising the areas of land take for construction works and careful siting of the routes of cables to avoid significant heritage assets. The impacts of the scheme on the historic landscape should be carefully considered and taken account of in the development of the scheme. This would particularly include those of the Wantsum Sea Channel and the setting of designated and undesignated heritage assets, including the Scheduled Monument of the Roman port of entry at Richborough and the undesignated potential Caesarian enclosure at Ebbsfleet. The County Council would expect to see a Historic Landscape Assessment as a specific outcome of the study.	The revised Order Limits of the Kent Onshore Scheme are much reduced from the Scoping phase and as such the land take has been reduced. Works undertaken to inform the baseline study and subsequent Cultural Heritage assessment have included geophysical survey and archaeological evaluation trenching, as well as geo-archaeological assessment of the Wantsum Channel area. A review of Historic Landscape Characterisation data has also been reviewed. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.3.3.B, 6.3.3.3.C. 6.3.3.3.D, 6.3.3.3.E, 6.3.3.3.F and 6.3.3.3.G**). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and

Kent County Council Comment	National Grid's Response
	inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
The County Council welcomes the inclusion of Cultural Heritage as a chapter in the Kent Onshore assessment and that Marine Archaeology is identified in the Offshore scheme.	Noted, no further response required.
Volume 1 Main Text - Part 3 Kent Onshore Scheme	
Public Rights of Way (PRoW): As a general statement, KCC is keen to ensure that its interests are represented with respect to the County Council's statutory duty to protect and improve PRoW in the County. The County Council is committed to working in partnership with the Applicant to achieve the aims contained within the KCC Rights of Way Improvement Plan and Framing Kent's Future Strategy (2022-2026).	Noted, **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** has been prepared in consultation with KCC to mitigate PRoW impacts. This plan will be developed further in advance of construction commencing. As part of Thematic meetings, the assessment approach to PRoWs has been discussed and agreed with stakeholders. We are confident that our desk based approach is sufficiently robust and incorporates best practice methodology used on comparable DCO schemes. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism** concludes that there are no anticipated significant effects on PRoW/Recreational routes as a result of the Proposed Project.
Overall, KCC welcomes the inclusion of the PRoW network and the reference made to the ROWIP in the Scoping Report. Public Footpaths TE39, TE40, TE37, TE32, TE26, EE42 and TR32, Restricted Byways TE35 and TE36 would be affected by the development. It is noted that a Public Footpath carries pedestrian rights only and a Restricted Byway carries pedestrian, equestrian and all non-mechanical vehicle rights.	Noted, no further response required.
With reference to the National Policy Statement for National Networks (NPSNN), this project provides an opportunity to improve the existing PRoW network. KCC requires a specific Rights of Way Plan to be prepared as part of the application for Development Consent Order giving details of the impact on each affected route, including temporary closures, alternative routes, timescale and legal management. The County Council request that efforts should be made to minimise path closures and retain popular routes during the project. Where temporary closures are required, convenient diversion routes should be provided to reduce disruption to path users. The Rights of Way Plan would be required to also address opportunities for enhancements to and development of the PRoW network as part of the project	As above, **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. **Application Document 7.5.1.2 Construction Traffic Management and Travel Plan - Kent** has been prepared as part of the ES.
KCC would request that a form of long-term Trust or Fund is in place to provide lasting mitigation through legacy projects and continued improvements as the project evolves in the region. This is in common with other Nationally Significant Infrastructure Projects (NSIPs) looking beyond the scheme itself	National Grid supports the delivery of community benefits associated with transmission infrastructure, and already has a number of established programmes which deliver this. For example, we operate a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure, and proposed the introduction of guidance in this regard. We support this and believe it should be flexible, allowing community benefits to respond to local and regional need. Whilst we await clarity on the government's position, we are working to understand local and regional aspirations and priorities in relation to community benefits. We welcome the suggestions for delivering community benefits and as the project progresses, we will work with stakeholders and local communities to further inform this.
The County Council requests continued engagement with the Applicant as the project progresses, to review these impacts and consider PRoW network improvements which could be delivered to enhance the legacy of the project.	Noted, **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. National Grid will continue to engage with KCC as the Proposed Project progresses.

Kent County Council Comment	National Grid's Response
3.1 Evolution of the Kent Onshore Scheme	
Heritage Conservation: With respect to the options appraisal and reaching a preferred option, other than mentioning the location of Scheduled Monuments, it is not clear on the extent to which heritage assets and the potential for heritage assets has influenced the selection. This needs to be set out in the forthcoming study given the general high level of sensitivity of the historic environment on and around the Isle of Thanet.	Noted. Heritage constraints have been used to inform route design, with information collected through works including evaluation trenching used to alter the Kent Onshore Scheme to avoid potential impacts (i.e. on the Ebbsfleet Peninsula).
3.2 Landscape and Visual	
PRoW: The County Council supports the inclusion of PRoW, the National Trail England Coast Path and Promoted Routes as viewpoints in Table 3.2.1. However, Figures 3.2.5 and 3.2.6 have wider inclusion for visual impact. The mitigation of screening and hedgerow planting is considered insufficient and the County Council would therefore advise a form of long-term Trust or Fund. This would provide substantial mitigation towards improvements and maintenance of the PRoW network in the area as compensation for the impact and the timescale of the scheme, as the project evolves in the region. This has similarly been undertaken in the Richborough Connection Project.	National Grid supports the delivery of community benefits associated with transmission infrastructure, and already has a number of established programmes which deliver this. For example, we operate a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure, and proposed the introduction of guidance in this regard. We support this and believe it should be flexible, allowing community benefits to respond to local and regional need. Whilst we await clarity on the government's position, we are working to understand local and regional aspirations and priorities in relation to community benefits. We welcome the suggestions for delivering community benefits and as the project progresses, we will work with stakeholders and local communities to further inform this.
Heritage Conservation: KCC understands that the scheme lies within and on the edges of the former Wantsum Sea Channel that was an important historic sea way and ancient harbour that was reclaimed from medieval times. The landscape is an important heritage asset and contains patterns of drainage and historic sea walls that evidence the reclamation of the former marshlands and sea, and features associated with its exploitation and use. The effects of the scheme on the historic landscape need to be fully considered and may require visuals of the effects from key features identified during walkover work, both for the Landscape and Visual Impact Assessment and for the Cultural Heritage assessment. The County Council notes that the proposed data sources set out in paragraph 3.2.7.1 refer to Historic England, but use should also be made of the Kent Historic Environment Record. The 4 former Wantsum Channel would fit within the landscape values outlined in paragraph 3.2.7.8.	Noted. A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.3.3.B, 6.3.3.3.C. 6.3.3.3.D, 6.3.3.3.E, 6.3.3.3.F and 6.3.3.3.G**). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.** A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in Appendix 3.3.A, with the full report provided in Appendix 3.3.G.
3.3 Ecology and Biodiversity	
Biodiversity: The County Council recognises that the project is proposing to achieve Biodiversity Net Gain and carry out a full range of ecological surveys to assess the impact on the designated sites and protected or notable species, as a result of the proposed development. As nothing of significance has been scoped out of the proposed EIA, KCC has minimal comments to make at this stage.	Noted, no further response required.
In regard to mitigation, the County Council would recommend that the Applicant reviews any monitoring associated with previous pipeline or wind farms. The design of the proposed mitigation can therefore be based on the previous projects and be improved based on the findings of the on-going monitoring. This will enable the Applicant to demonstrate that the mitigation can be achieved.	Noted. However, there will be no loss of vegetated habitat in Thanet Coast & Sandwich Bay SPA due to the scheme (unlike Nemo Link) as the site will be traversed using HDD. For further detail please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.**
3.4 Cultural Heritage	

Kent County Council Comment	National Grid's Response
Heritage Conservation: The County Council has been engaged with the Applicant during this pre-application stage of the processes and has had the opportunity to comment on the scope of the archaeological works alongside the Ground Investigation proposals, and provide archaeological advice to both District Councils. Impacts on the setting of Built Heritage will be led on by the District Conservation Officers and Historic England. It is also noted that Historic England will generally lead on advice with respect to Offshore archaeology below the Mean Low Water mark, while KCC's comments below also cover assessment of the Historic Landscape.	Noted, no further response required.
KCC notes the range of impacts that may affect heritage assets in Table 3.4.1. The construction impacts will need to consider temporary and enabling works as described in Volume 1 Main Text – Part 1, and potentially any off site mitigation or compensation measures that may arise during the development of the scheme. The County Council is of the view that there remains some potential for maintenance and decommissioning works to affect heritage assets that may have been left preserved within the scheme areas or nearby and that this should not be scoped out of the EIA.	Noted, please refer to **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** for the full assessment.
Heritage Conservation: KCC notes that the study area for the Landscape and Visual Impact Assessment is set at 3km from the scheme boundary but at only 1km for the Cultural Heritage. This limitation would not include the important Scheduled Monument at Richborough and its setting. This monument is on an area of high land overlooking the mouth of the former Wantsum Sea Channel and the impact on its setting is an important consideration. It is also noted that a viewpoint is proposed from Richborough and this should be agreed with Historic England who manage the heritage site. The setting within the scheme from the Ebbsfleet Hill enclosure should be also considered. 5 The scoping boundary set out for the Cultural Heritage Study, both for the designated heritage assets in Figure 3.4.1 which shows the scoping boundary plus a 1km buffer, and the Non-Designated Assets in Figure 3.4.2, are not sufficient. The setting of designated heritage outside the 1km buffer is needed, especially as the setting of Richborough Castle Scheduled Monument has been highlighted. The scheme is set on low levels that are overlooked from both sides of the former Wantsum Channel.	Noted. The study area adopted for impacts on setting for heritage was set at 2 km from above ground infrastructure. However, it was acknowledged that there was the potential for impacts on the setting of designed assets outside of this area. Assets taken forwards to full assessment were discussed with relevant heritage stakeholders including Kent County Council and Historic England.
The County Council considers that the limitations of the study area for the non-designated heritage will not provide a thorough enough understanding of the rich archaeological heritage of this area and the context for the heritage assets within the scheme. A wider understanding of the rich and unique archaeological heritage of the Isle of Thanet is needed and a study should be made of major archaeological works that have been undertaken on the island. KCC would welcome a discussion to advise further on this matter. The 1km buffer would provide an adequate study area for a detailed review of the non-designated heritage assets that can provide a more thorough understanding of the archaeological heritage and rich buried landscapes. KCC also notes the discussion of the study area in paragraph 3.4.7.3 and this needs to take account of the above comments.	Consultation with the KCC Archaeological Advisor has been undertaken throughout the project and this has included agreeing the Study Area as well as undertaking data searches for information held on the Kent HER. This information, as well as additional information from the surveys and fieldwork conducted has been used to inform the baseline as well as the assessment.
Heritage Conservation: KCC notes that the baseline described in paragraph 3.4.4 is limited by the boundary of the study area for the Scoping Report. Further baseline study needs to be thorough in examining aerial photographs, use of Light Detection and Ranging (LiDAR), analysis of investigation reports, including those which have not been added to the Historic Environment Record to date, and borehole records. This is particularly important within the area of the former marshlands where the modelling of the subsurface deposits is required to take place within the scheme area. The County Council advises early discussion with KCC with respect to available sources and the scope of the study.	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.3.3.B, 6.3.3.3.C. 6.3.3.3.D, 6.3.3.3.E, 6.3.3.3.F and 6.3.3.3.G**). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
Heritage Conservation: The County Council supports the desk based assessment that will be prepared as a first step in the proposed assessment methodology and notes that KCC has generic specifications for a desk study that should be responded to.	Noted.

Kent County Council Comment	National Grid's Response
KCC also welcomes the proposed walkover survey. It would be useful at an early stage for the County Council to visit the area with the Applicant's archaeologist. The walkover should be undertaken at an early stage and influence the final alignment, rather than checking it as set out in paragraph 3.4.7.5.	Noted. A joint site visit was undertaken with the KCC Archaeological Advisor in January 2023, and consultation has taken place throughout the duration of the project.
KCC have already provided some input into the scope of monitoring of geotechnical works and the results of this work and any modelling from it should be integrated into the study. Given the richness of the archaeological landscape, it is highly likely that further survey and evaluation, both intrusive and non-intrusive, will be needed to inform the assessment and identify significant heritage assists that may need to be taken account of in scheme design and layout. It will be important for continued dialogue to be maintained between the Applicant's archaeologists and the County Council throughout the study.	Changes in the type of GI works being undertaken resulted in the geo-archaeological monitoring of the GI works was scoped out in agreement with the KCC Archaeological Advisor. A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.3.3.A Appendix 3.3.A Archaeological Baseline Report**, and are provided in full within **Application Document 6.3.3.3.B, 6.3.3.3.C. 6.3.3.3.D, 6.3.3.3.E, 6.3.3.3.F and 6.3.3.3.G**). All survey works were undertaken in accordance with WSIs approved by the Kent County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**). A detailed piece of work by a geo-archaeologist has been undertaken in Kent for the area of the former Wantsum Channel due to the high potential for significant palaeoenvironmental remains to survive in this area. The scope for this work was agreed through consultation with relevant heritage stakeholders. This is synthesised in **Application Document 6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report**, with the full report provided in **Application Document 6.3.3.3.G Appendix 3.3.G Geo-Archaeological Desk Based Assessment**.
3.5 Water environment	
Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, is pleased to note that this section details how the water environment assessment will be undertaken and notes that it will be supported by a Flood Risk Assessment (FRA) and Water Framework Directive (WFD) Screening Assessment.	Noted, no further response required.
Whilst KCC has no preference whether the Flood Risk Assessment forms part of an EIA or is a standalone document, the County Council would emphasise that the FRA should include a Surface Water Management Strategy to adequately demonstrate how surface water will be managed within the development.	The FRA is provided as Application Document 6.8 and contains details of how surface water will be managed by the Proposed Project during its construction and operation.
In addition to the policies referenced in paragraph 3.5.5.4, the County Council would request that the following KCC policies are considered for designing a future surface water drainage scheme: • Kent County Council's Drainage and Planning Policy Statement (2019) (Appendix A) • Kent Design Guide Making it Happen - Appendix C2 Drainage Systems	Noted, National Grid will consider these policies when designing a future surface water drainage scheme.
The Drainage and Planning Policy Statement sets out how Kent County Council, as Lead Local Flood Authority and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development. This document should be referred to for further details about the County Council's submission requirements.	The Proposed Project has engaged with Kent CC in their role as LLFA to shape the drainage strategy and key design principles and standards have been agreed.
Whilst further details of the drainage arrangements will be forthcoming within a future report, KCC would highlight that as of 10/05/2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes. KCC would now expect all applications to adhere to this latest guidance and would draw attention to the following webpage for further information on the allowances and supporting allowances map.	The Applicants drainage design has adopted the latest update to the Environment Agency climate change guidance dating to May 2022.

Kent County Council Comment	National Grid's Response
3.6 Geology and Hydrogeology	
Minerals and Waste: The County Council notes that the proposal would not significantly affect safeguarded land-won minerals in the Kent scoping area, however, there are some safeguarded Storm Beach (sand and gravel deposits) in the Minster area. There are safeguarded waste management facilities nearby, but none within the area detailed area of the scoping boundary.	Noted, no further response required.
Therefore, the land-won mineral safeguarding policies of the Kent Minerals and Waste Local Plan (KMWLP) (2013-30) will need to be addressed if any of the link structures would result in sterilisation of these deposits. Where the proposed development is coincident with safeguarded minerals, a Minerals Assessment will need to be undertaken if prior extraction is not possible or desirable. The Minerals Assessment will identify which exemption from the 7 presumption to safeguard the mineral resources is appropriate to invoke from Policy DM 7 of the KMWLP.	The Proposed Development does not interact with any safeguarded minerals within Kent which is discussed further within **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology.**
Waste Management: The County Council is pleased to note that reference has been made to the Cliffsend landfill, known as Pegwell Bay closed landfill site to KCC, in the Scoping Report, as the Kent Onshore Scheme looks to pass through or across this area. The County Council agrees with paragraph 3.6.6.6 which states that the potential for mobilisation of existing contamination shall be scoped in to the EIA. Detailed investigation and considered design will be required so that the potential risk from the closed landfill is managed and, where needed, mitigated as part of the project.	Noted, no further response required.
3.8 Traffic and Transport	
Highways and Transportation: The County Council, as Local Highway Authority, is satisfied with the provisions that have been made to fully assess and manage the highway impacts of the proposal.	Noted, no further response required.
PRoW: The County Council is supportive of the PRoW detailed to be considered in paragraph 3.8.3.5. However, it is recommended that reference to the England Coast Path in this paragraph and in paragraph 3.8.4.16 is amended from 'Promoted Route'. The England Coast Path is a National Trail of which there are only 16 in the country, and are considered to pass through some of the best landscapes in England and Wales.	A PRoW thematic meeting was held in July 2024 and items in regard to the categorisation of routes for assessment is addressed within the Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
PRoW: The County Council welcomes the inclusion of PRoW within the Construction Traffic Management Plan and, if applicable, would advise temporary closures applied for at the earliest stage. KCC, as Local Highway Authority would also request engagement with the Applicant regarding timescales and the project schedule, to ensure user safety has priority.	Engagement has taken place with KCC through thematic meetings, and the A**pplication Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** sets out a framework for managing PRoW during the construction phase.
PRoW: KCC notes that construction traffic forecasts will be confirmed in the Environmental Statement and Transport Assessment in paragraph 3.8.2.11. KCC would highlight that PRoW must not be used as construction routes and that all routes affected by construction should be reinstated to an improved standard as mitigation.	The construction traffic forecasts are set out in full within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**. As set out within the **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent**, PRoW routes will not be used to accommodate construction traffic, as diversions will be provided wherever required.
In reference to Table 3.8.1, the County Council would agree that PRoW should be scoped in for construction impact, operation, maintenance and decommissioning purposes. Regarding Table 3.8.2, KCC supports the inclusion of PRoW for construction and decommissioning, but would recommend that reference is made to Restricted Byways as well as Footpaths and Bridleways, such as TE35 and TE36. The PRoW use is therefore pedestrian, equestrian, cyclist and non-mechanical vehicles. It is also noted that national or regional walking and cycling routes are also, in part, PRoW and should therefore be scoped in.	Noted, no further response required.

Kent County Council Comment	National Grid's Response
PRoW: KCC recognises that paragraph 3.8.3.9 details potential traffic-related effects to be considered by other topics and notes that PRoW should be included in Noise, Air Quality, Socio-Recreation and Tourism	Public Rights of Way (PRoW) have been assessed following established practice in Environmental Impact Assessment (EIA). It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects. PRoWs are assessed across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments. In the instance that combined impacts form the various assessments arise on a particular PRoW, the impacts are considered collectively within **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects**, which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters. **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. **Application Document 7.5.1.2 Construction Traffic Management and Travel Plan - Kent** has been prepared as part of the ES.
PRoW: The County Council notes that the existing baseline conditions in the Transport Assessment in paragraph 3.8.3.19 must include Restricted Byways.	Noted. Where relevant, Restricted Byways are addressed within **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent.**
KCC would draw attention to paragraph 3.8.3.31 and would note that all PRoW Diversions or Closures must have the approval of the County Council. It is also recognised that the Institute for Environmental Management and Assessment (IEMA) guidelines state that the magnitude of each impact should be determined as the predicted deviation from the baseline conditions. KCC notes that user numbers are not necessarily the baseline, it is the protection of the public rights	Noted. This approach is agreed and carried through the assessment.
It is noted that Table 3.8.5 in the Scoping Report categorises the overall magnitude of effect of a PRoW diversion or closure, and KCC would emphasise that there should always be an alternative safe route provided.	Noted and agreed, as set out within **Application Document 6.2.3.7 Part 2 Kent Chapter 7 Traffic and Transport** and reflected in **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent.**
In reference to Table 3.8.7, all PRoW benefits and amenities, including those to National or Regional routes, will be impacted during operation and this must be recognised within the Scoping Report. The mitigation of these impacts should therefore be included.	Assessment of National and Regional routes are included in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** and reflected in **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent.**
3.9 Air Quality	
PRoW: The County Council would request the consideration of PRoW users in air quality, depending on the site layout and existing and temporary routes at all stages of construction and decommissioning.	A detailed air quality assessment has been undertaken at ES stage to determine the impact on human and ecological receptors from construction vehicle emissions. Consideration of PRoW is included in this. For further details please refer to A**pplication Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality.**
3.10 Noise and Vibration	
PRoW: KCC requests that the impact of the development on the PRoW network in respect of noise and vibration must be included regarding the construction, operation and decommissioning stages of the development.	An assessment of noise and vibration effects on PRoW is provided in **Application Document 6.2.3.9 Part 2 Kent Chapter 9 Noise and Vibration.**
The County Council must also be kept informed as to the works schedule to inform PRoW users of any impacts. A Communications Plan must be provided in the form of a webpage and social media outlets to both update public information and promote enhancements to routes provided by the project, as demonstrated with the Richborough Connection Project.	Noted, **Application Document 7.5.1.2 Construction Traffic Management and Travel Plan - Kent** has been produced as part of the Development Consent Order Application and this will be developed further in advance of construction.

Kent County Council Comment	National Grid's Response
KCC notes that Table 3.10.11 of the Planning Practice Guidance for Noise (PPGN) noise exposure hierarchy should include PRoW users.	Noted, please refer to **Application Document 6.2.3.9 Part 2 Kent Chapter 9 Noise and Vibration** for further details.
3.11 Socio-economics, Recreation & Tourism	
Provision of County Council Community Infrastructure and Services: The County Council, as key infrastructure service provider, welcomes the inclusion of the St Augustine's Cross Memorial site and the Pegwell Bay Country Park as important visitor attractions and open space that may be impacted by this project.	This comment has been noted. These receptors have been identified within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 7: Baseline Conditions. A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism,** Section: 9 Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on these receptors as a result of the Proposed Project.
However, the area considered for socio-economic impact needs to be wider than it is currently. KCC would request that additional high-value economic tourism assets are scoped in, as these may be impacted by the schedule of works, including road closures and noise. The impact on tourist visitor numbers to the area may be significant.	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 6: Study Area presents the socio-economic, recreation and tourism impacts by geographical scale at which each component is assessed, and the rationale behind these geographical scales. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 7: Baseline Conditions identifies receptors within, and up to 500 m radius from the Kent Onshore Boundary. 500m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits, based on the Design Manuel for Roads and Bridges (DMRB) LA 112. Receptors that lie outside of the study area but are of relevance to the assessment have also been included. The assessment of effect on tourism and recreation assets is included within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section: 9 Assessment of Impacts and Likely Significant Effects.
The County Council would request that additional leisure areas and attractions are considered for inclusion in the scoping exercise for the impact on tourism and economic development. These attractions stretch across the Districts of Dover and Thanet: • Sandwich and Pegwell Bay • Royal St George's Golf Course, Sandwich (home to the British Open) and neighbouring golf clubs • The Viking Ship Hugin • Minster Abbey and Minster village • Ramsgate Royal Harbour • Sandwich historical centre and Sandwich Quay • Richborough Roman Fort and Amphitheatre	**Application Document 6.2.3.10 Part 3 Chapter 10 Socio-economics, Recreation and Tourism,** Section 6: Study Area presents the socio-economic, recreation and tourism impacts by geographical scale at which each component is assessed, and the rationale behind these geographical scales. **Application Document 6.2.3.10 Part 3 Chapter 10 Socio-economics, Recreation and Tourism**, Section 7: Baseline Conditions identifies receptors within, and up to 500 m radius from the Kent Onshore Boundary. 500m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits, based on the Design Manuel for Roads and Bridges (DMRB) LA 112. Receptors that lie outside of the study area but are of relevance to the assessment have been included. The assessment of effect on tourism and recreation assets is included within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section: 9 Assessment of Impacts and Likely Significant Effects.
It is requested that the Sea Link landfall works causing the most disruption would not be scheduled during the summer months when tourism numbers in this part of Kent are at their highest.	An indicative construction programme is presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. This has been used in the assessments presented in the Environmental Statement technical chapters.
PRoW: The County Council welcomes the consideration of PRoW regarding potentially significant socio-economic, recreation and tourism effects in paragraph 3.11.1.5, and in the Local Planning Policy Guidance mentioned in paragraph 3.11.2.8. KCC also welcomes the inclusion of the County Council's PRoW map to inform the baseline for recreational routes, and PRoW in paragraph 3.11.4.2.	Noted, no further response required.
In reference to paragraph 3.11.4.12. the listed recreational routes and PRoW that intersect the study area should also include Restricted Byways.	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism**, Section 7 - Baseline Conditions, identifies restricted byways which pass within the Kent Onshore Scheme draft Order Limits.

Kent County Council Comment	National Grid's Response
The County Council is supportive of PRoW being scoped in for construction, operational, maintenance and decommissioning impacts, with all matters to be approved by KCC. The County Council agrees with the 500m radius mentioned for PRoW in Table 3.11.2 of the impact pathways, and also in Table 3.11.3 of the proposed scope of the assessment, which includes both a 500m and 1km radius.	Noted, no further response required.
Country Parks: Pegwell Bay Country Park is a public park and community asset that provides many recreation and leisure opportunities. The site is well managed with its large wildlife population, varied habitats and daily customers to the park, and is a former landfill 10 site. As the Applicant's preference is for a landfall area in Pegwell Bay (Option K1), the County Council considers that there will be significant noise and amenity impacts to the Country Park from the project, which should be scoped into the EIA. There would be considerable disruption to the accessibility of the site during construction, with the Applicant likely to seek access for works through and across the Country Park car park, coastal path and internal paths of the site. KCC notes that the paths are not suitable for vehicles and works undertaken to widen and surface the paths would impact the habitats of the site and affect user safety. It would also be more difficult to promote the park as fully accessible to all, particularly those using pushchairs, people with disabilities and young families.	This comment has been noted. Pegwell Bay Country Park has been identified within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 7 - Baseline Conditions. A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 9 - Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on the receptor as a result of the Proposed Project. **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the potential for noise and amenity effects and concluded that there are no anticipated significant effects on the receptor.
The project will also impact the business during construction and post construction and without the appropriate mitigation at these stages, there may be a negative impact on the visitor numbers. This could result in reduced income from parking, and from the licence fee as a result of the catering, as the business could potentially experience falling sales. The County Council seeks to work with the Applicant to minimise the impact on users of the Country Park. Another possible consequence is the displacement of visitors to surrounding and more sensitive areas of habitat and landscape.	This comment has been noted. Pegwell Bay Country Park has been identified within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 7 - Baseline Conditions. A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 9 - Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on the receptor as a result of the Proposed Project. **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the potential for noise and amenity effects and concluded that there are no anticipated significant effects on the receptor.
The County Council would also draw attention to the impact of the Nemo Link Project on the Pegwell Bay Country Park. This project had a highly disruptive construction process, which resulted in a chalk berm that significantly changed the sites topography and accessibility and negatively affected visitor satisfaction levels, as noted within the Local Impact Report for the Thanet Windfarm Extension DCO (PINS Reference EN010084). Limited communication and information was shared with Country Park Rangers regarding closures and temporary rerouting of internal access routes. The County Council would therefore welcome continued engagement with the Applicant as the development progresses. The introduction of another cable to Pegwell Bay Country Park, possibly crossing the Nemo Link structure, could considerably impact the ability to graze and manage the site for wildlife and landscape.	Noted, National Grid has and will continue to engage with Kent County Council as the development progresses. The Proposed Project has committed to trenchless installation techniques in order to avoid similar impacts from NEMO Link (**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**). A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments, which could result in significant cumulative effects. The offshore scheme cumulative assessment now considers the maintenance activities associated with Nemo Link. The onshore elements of Nemo Link are operational and therefore been considered in the technical topic baselines and therefore Nemo Link has not been considered in the Kent Onshore Scheme CEA. Further information can be found within **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**

3.12 Health and Wellbeing

Kent County Council Comment	National Grid's Response
PRoW: The County Council welcomes the inclusion of PRoW in paragraph 3.12.6.4, and in Tables 3.12.1 and 3.12.3. However, there should not be reference to the 'permanent' closure of PRoW, as KCC would not agree to extinguishments or severance.	As stated within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**, the Proposed Project would cross the existing Public Rights of Way (PRoW) network requiring either PRoW provisions, long term temporary diversions, short term temporary diversions and permanent diversions. Please refer to this chapter for further details. As described above, **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. **Application Document 7.5.1.2 Construction Traffic Management and Travel Plan - Kent** has also been prepared as part of the ES.
4.7 Marine Archaeology	
Heritage Conservation: The lead consultee with respect to the impact of the scheme on marine heritage will be with Historic England. The County Council will have a particular interest in the landfall area at Pegwell Bay (Option K1) where heritage assets are recorded within the intertidal areas, both buried within marine alluvials and as structures and wrecks / hulks. KCC draws attention to recent work by the Coastal and Intertidal Zone Archaeological Network (Citizan) Project that has focused on this area and is a useful source for information that may not yet be on the Kent Historic Environment Record.	The results of the CITiZAN project, Searching Sandwich Flats, have been included where relevant in the technical report (**Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**), which is included as part of the ES submission.
KCC notes that Chapter 7 covers Marine Archaeology and heritage receptors are illustrated in Figure 4.7.1. The figure records only those features from the National Marine Heritage Record (NMHR) and UK Hydrographic Office (UKHO) data sources. The County Council recognises that in paragraph 4.7.4.21, the Scoping Report notes that there are no records on the Kent Historic Environment Record in or close to the study area. The intertidal areas will form part of the Kent Onshore assessment and will hopefully pick up heritage assets noted by Citizan and others that may not be on the Historic Environment Record. This information will inform the potential impacts in areas of Pegwell Bay below the low water mark. The County Council is supportive of paragraph 4.7.5.8, which notes that the intertidal area will be walked as part of the assessment.	The results of the CITiZAN project, Searching Sandwich Flats, have been included where relevant in the technical report (**Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**), which is included as part of the ES submission.
The County Council welcomes the review of the geophysical and geotechnical survey data that will be undertaken for the purpose of the assessment. It would be useful for the marine archaeologists and geoarchaeologists working on the assessment to provide input into the scope and design of such surveys so optimum data can be acquired. KCC advises that there should be close liaison between geoarchaeologists and geotechnical specialists in scoping, taking, extracting and assessing bore hole samples.	This comment is noted and geophysical and geotechnical specialist input will be provided for future marine surveys as detailed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology of the ES.**
KCC supports the proposed assessment methodology set out in paragraphs 4.7.7.2 to 4.7.7.8 that will identify heritage assets and their significance. Historic England will lead on considering the significance of marine heritage and the scope of assessment; however, the County Council welcomes the proposed scope in Table 4.7.9.	The significance of the known and potential resource is addressed in the technical report (**Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report)**, which is included as part of the ES submission.
Volume 3 Figures	
PRoW: The County Council is pleased to note that the Scoping Report shows the PRoW network, the England Coast Path National Trail and countywide Promoted Routes.	Noted, no further response required.
KCC would welcome continued engagement as this proposal progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.	Noted, no further response required.

1.20 Leiston-cum-Sizewell Town Council

Table 1.19 Leiston-cum-Sizewell Town Council

Leiston-cum-Sizewell Town Council Comment	National Grid's Response
Policy: Has satisfactory consideration been given to change in Government Policy Change to look at offshore alternatives eg an Offshore Grid through the North Sea Corridor?	Please refer to **Application 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, which outlines the considerations made to the offshore scheme and marine route alignments.
Suitability of our rural area: Has satisfactory consideration for the potential for brown field site development elsewhere?	In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**. As stated in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, "*Due to land use of the Project study area defined by the connection points, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements*".
Overall impact: This Council, unsurprisingly, has concerns on the impact on Leiston-cum-Sizewell itself, a parish of approximately 6,000 residents. The combined significant projects listed on Page 24 Vol 2 Appendices namely SEA LINK, EUROLINK, Nautilus Interconnector, Scottish Power Renewables and offshore windfarms (East Anglia One North and East Anglia Two) confirm a number of unprecedented and uncoordinated energy projects coming forward in the foreseeable future. We would urge the Inspectorate to take a holistic view. We request the Inspectorate considers these projects as a collective and does not see them in isolation, if it is to fully understand the impact on Leiston-cum-Sizewell and surrounding area. Leiston is in danger of being encircled by construction which will have a major impact on our community for more than a decade.	Noted, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Co-ordination of projects: Has sufficient attention been given to exploring coordinated network design and coordinating projects? This Council has concerns about the capacity of existing electricity pylons and seeks reassurance that there will not be further disruption to the landscape of unsightly pylons.	Noted, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

Leiston-cum-Sizewell Town Council Comment	National Grid's Response
Traffic Concerns: A combination of projects will collide with the peak construction of Sizewell C (predicted at year 5/6 estimated to be around 2027). This will mean considerable congestion and traffic movements on all routes in and out of Leiston. Whilst this Council accepts there will be designated routes, it is our opinion that there will be an increase in general traffic congestion on what are rural routes like the A1094 and the junction of the A1094 and the B1122 at Backheath Corner, which is already an accident blackspot. Such an increase in traffic and construction will result in years of disruption for Leiston's coastal-based community and a devastation of the surrounding rural landscapes. The likely impact will be that residents travelling North, South or East of Leiston, will encounter a landscape of continual construction. Equally, this will impact on commuter traffic from Leiston to workplaces in the wider area, Ipswich and beyond, once more acting as a deterrent to those considering a home in our parish.	The construction vehicle routing has been designed to minimise impacts across the highway network (including the A1094 and B1122), as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk**. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place, including for the parts of the network identified (A1094 and B1122). The consideration of cumulative effects as a result of committed developments is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Oshore Scheme Inter-Project Cumulative Effects** based on **Application Document 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments,** which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm.
Social Impact: As a result of all of the above, this Council believes that the result of an encirclement of Leiston by construction will lead to the social migration of residents to live elsewhere, and the moving in of construction workers. This suggests that when the construction projects are completed Leiston will have lost much of its inherent community and with it, its unique character. This was its experience during the construction of SZB and memories are long. With an outage at each nuclear reactor every 6 months and maintenance required to the offshore sector, this could lead to Leiston supporting nothing other than the nuclear industry and its supporting sectors, forcing others to live elsewhere.	The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** For details on the assessment of impacts to the local community from the Proposed Project, please refer to **Application Document 6.2.2.7 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism** and for impacts to human health please refer to **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing.**
Access to Leisure and Tourism: Whilst Council recognises Leiston-cum-Sizewell is not a tourist honeypot it does nevertheless have notable tourist attractions, including the popularity of the coastal walks within the parish. The Long Shop Museum celebrates Leiston's significant history and role in the Industrial Revolution. The Leiston Film Theatre, or Leiston Picture House as it was originally named, opened in October 1914 and has traded continuously for 105 years. The effect of encircling the town will impact on the Page 2 of 2 access to these notable sites and present both with significant challenges threatening their viability going forward. Leiston will find itself less able to compete with nearby honeypot towns. The Inspectorate are asked to consider this social impact alongside the environmental impact, which we believe go hand in hand. It was this Council's understanding that during the construction of SZC, Leiston would be protected in the South to access leisure amenities - Aldringham Walks, Thorpeness, Snape, all within the AONB. These projects threaten this access with the result that residents will have no choice but to travel further afield to enjoy any of the benefits of living by the sea and residing in a rural location. This will add to the impact of residents moving from the area. This Council would like to see greater depth as to the mitigation aspects for residents 'enjoying' where they live and the impact this will have on their quality of life and therefore their mental and physical health.	This comment has been noted. A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 9 - Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on Leiston as a result of the Proposed Project. **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the potential for noise and amenity effects and concluded that there are no anticipated significant effects on Leiston.
Net Zero Leiston: This Council is committed to achieving Net Zero Leiston ambitions. Visit https://www.netzeroleiston.info It has developed a route map to achieving Net Zero, the first rural town to do so. Whilst Council accepts that the result of these combined projects is to support carbon efficient resources for the East and South East of the UK, nevertheless, Council would like to see greater emphasis on the mitigation measures taken to keep carbon impact to a minimum. We refer the Inspectorate to the website. Council would want to see greater depth explored as to significant landscape scale mitigation opportunities to gain maximum impact in the shortest possible time.	A lifecycle greenhouse gas assessment is included within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. This assessment goes into more detail than the greenhouse gas assessment previously submitted in the Preliminary Environmental Information Report (PEIR). This assessment has been conducted in accordance with the Institute of Environmental Management and Assessment (IEMA) good practice guidance for greenhouse gas assessments in Environmental Impact Assessments.

Leiston-cum-Sizewell Town Council Comment	National Grid's Response
	The greenhouse gas assessment considers the mitigation measures embedded in the project to reduce greenhouse gas emissions, as well as puts forward additional mitigation measures where applicable. More detail on the mitigation measures is provided in the greenhouse gas assessment. The Proposed Project has been designed to increase the capability of the network to carry low carbon and renewable energy from where it is generated to homes and businesses across the country. Sea Link will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets, but also deliver a more secure and resilient energy system. The implications of the Sea Link project on net zero targets is considered and discussed in more detail in the greenhouse gas assessment. **Application Document 7.5.13 Greenhouse Gas Reduction Strategy** has been developed alongside **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. This document sets out how greenhouse gas emissions will be managed across the project lifecycle and discusses decarbonisation opportunities.
Protecting our local Environment: Council will concur with the expertise of the AONB, RSPB, and others who are specialists in their field and will seek to endorse their views on the overall impact on habitats in the area. At the heart of this Council's concerns would be the industrialisation of an area of natural beauty.	Noted, no further response required.
Pollution: the cumulative impact of these projects on the air quality for our residents is of concern. We ask the Planning Inspectorate to consider the impact of these projects on the health of our residents – particularly the young, the elderly and those already suffering from chronic disease.	Noted, the consideration of potential cumulative effects arising as a result of other proposed developments within the cumulative study area in combination with the Proposed Project has been presented and assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** This includes consideration of cumulative air quality impacts to residents within the cumulative air quality study area.
Judicial Review: Council understands that SASES (Substation Action, Save East Suffolk) has gone to a Judicial Review? The Inspectorate are asked to consider the outcome of this review in connection to the wider projects and impacts.	It is noted that the Judicial Review was unsuccessful. No further response required.

1.21 Marine Management Organisation

Table 1.20 Marine Management Organisation

Marine Management Organisation Comment	National Grid's Response
Proposal	
1.1 Project Background Sea Link (the Proposed Development) is a proposal by National Grid Electricity Transmission plc (the Applicant) to reinforce the transmission network in the south east of England and East Anglia. The Proposed Development is required to accommodate additional power flows generated from renewable and low carbon energy generation, as well as additional new interconnection with mainland Europe. The offshore element of the Proposed Development is located wholly within English Territorial Waters, and includes three distinct components: • Suffolk Landfall: This is the area where the cable route transitions between the marine and terrestrial environment in Suffolk. This is located between Aldeburgh and Thorpeness with an alternative landfall currently also under consideration at Sizewell gap. • Kent Landfall: this is the area where the cable route transitions between the marine and terrestrial environment in Kent, located in the Pegwell Bay area; • Marine Cable Route: This is the cable route from landfalls in Suffolk up to Mean High Water Springs (MHWS) to the landfall in Kent up to MHWS, between approximately 120-128 km in length and located entirely within UK territorial waters.	The Full Proposed Project description is contained within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Location	
Sea Link is located between Kent and Suffolk which is displayed in Figure 1 below.	The Full Proposed Project description is contained within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Scoping consultation response	
Pursuant of the Regulations, the Applicant has requested a Scoping Opinion from the MMO. In so doing a Scoping Report entitled "Sea Link, Environmental Impact Assessment Scoping Report" has been submitted to PINS for review for all stakeholders.	Noted, no further response required.
The MMO agrees with the topics outlined in the Scoping Report and in addition, we outline that the following aspects be considered further during the Environmental Impact Assessment (EIA) and must be included in any resulting Environmental Statement (ES)	Noted, no further response required.
3.1 Nature Conservation	
3.1.1 The MMO defers to Natural England as the Statutory Nature Conservation Body (SNCB) on the suitability of the scope of the assessment with regards to Marine Protected Areas (MPAs).	Noted, no further response required.
3.2 Benthic ecology	
The MMO consider the potential sources of impacts listed in Table 4.3.2 to be comprehensive; the MMO has not identified any omissions with respect to benthic ecological interests	Noted, no further response required.
The MMO agrees with the scoping out of the three potential impacts as outlined in Table 4.3.2.	Noted, no further response required.
The MMO consider that the embedded measures outlined, particularly rerouting procedures to minimise the potential for the cable route corridor to interfere with habitats of particular importance, are defendable and each contribute to a reduction in the significance of residual impacts.	Noted, no further response required.

Marine Management Organisation Comment	National Grid's Response
3.3 Coastal Processes	
The scoping report is based on physical data from a variety of sources, including wind and wave data from the ABPmer SeaStates database, and bathymetry and seabed composition data from the EMODnet Bathymetry Portal and British Geological Survey. The MMO considers this to be a reasonable approach which will inform the identification of potential physical pathways for impacts.	Noted, no further response required.
The MMO agrees with that all potential physical impacts the Proposed Development could have, have been scoped in.	Noted, no further response required.
The MMO agrees that the potential impact of the project on the metocean conditions can be scoped out, however is pleased to see the Applicant plans to include the potential disturbance/change to seabed morphology and coastal processes at landfall locations due to the presence of cable protection measures.	Noted, no further response required.
3.4 Seascape / Landscape	
The MMO defers to Historic England, Natural England (as the SNCB) and relevant local planning authorities on the suitability of the scope of the assessment with regards to Seascape and Landscape.	Noted, no further response required.
3.5 Fish Ecology and Fisheries	
Appropriate data sources have been identified to inform a PEIR and/or ES. The MMO has noted that the scoping report has combined fisheries data from the Marine Management Organisation landings (MMO 2021) with other studies to identify local fish receptors.	Noted, no further response required.
Potential impacts to the Thames / Blackwater herring should be scoped in. This is a discrete population of spring-spawning herring which are known to have spawning grounds at Herne Bay in Kent, and at the Eagle Bank and Osea Island at the mouth of the Blackwater estuary. Thames / Blackwater herring are considered to be a separate population from the North Sea stocks. They also have distinct ecological differences from other UK populations that should be considered as such for the purpose of the EIA. Their spawning season is from late February to early May.	Impacts to fish and shellfish have been addressed in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** in the ES. Herring and sandeel spawning grounds have been included in the assessment and in detail in **Application Document 6.3.4.3.A Appendix 4.3.A Herring and Sandeel Assessment.**
The MMO agrees that the Applicant has identified the main impacts and impact pathways to fish and fisheries receptors during the construction, operational and decommissioning phases. The MMO agrees with the approach to assess changes in marine water quality due to drilling fluids and accidental spills from vessels within the separate Code of Construction Practice	Noted, no further response required.
The MMO has noted that the Guidelines for Ecological Impact Assessment in Britain and Ireland – Terrestrial, Freshwater, Coastal and Marine will be followed to inform the assessment of the Offshore scheme impacts on fish species. The MMO agrees with this is approach. However, the proposed approach to determining potential herring spawning habitat (using the MarineSpace et al. 2013b approach), the MMO recommends that the Applicant uses a minimum of 10 years of International Herring Larvae Survey (IHLS) data to inform to assessment. Please note that until recently the Southern North Sea and eastern English Channel (SNS) IHLS surveys for the Downs herring population were conducted as three separate sampling event surveys; one in the 3rd quarter of each year undertaken by the Netherlands between 16-31 December, and two in the 1st quarter of each year; between 1-15 January undertaken by Germany, and between 16-31 January undertaken by the Netherlands. However, the latter survey (16-31 January) was discontinued in 2017 (ICES 2021) so this should be born in mind when downloading and using the IHLS data to inform the assessment. Please also note that no IHLS surveys are conducted at the Thames/Blackwater herring spawning grounds.	Impacts to fish and shellfish have been addressed in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** in the ES. Herring and sandeel spawning grounds have been included in the assessment and in detail in **Application Document 6.3.4.3.A Appendix 4.3.A Herring and Sandeel Assessment.**

Marine Management Organisation Comment	National Grid's Response
The MMO considers the embedded and control and management/mitigation measures proposed by the Applicant to be appropriate.	Noted, no further response required.
It is noted however, that a target cable burial depth of 1 to 2m has been set as a mitigation measure for commercial fisheries receptors to prevent snagging/interaction with fishing gear. In accordance with the Department of Energy and Climate Change report (2011), the MMO recommend a minimum cable burial depth of 1.5m (subject to local geology and obstructions) to minimise the effects of EMF for fish receptors.	The Proposed Project has committed to a cable burial depth of between 1.0 metres (m) – 2.5m (subject to local geology and obstructions) (mitigation measure FSF01) in accordance with the Department of Energy and Climate Change Report (DECC 2011). An impact assessment in relation to the effects of EMF on Fish and Shellfish receptors has been undertaken for the worst-case scenario of 1.0 m burial depth, which is estimated for only ~22% of the entire offshore cable route. The EMF emissions were modelled and the effect predicted to be very low and not significant. Please refer to **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** for further information.
The Applicant has proposed that 24-hour construction will take place and reduce the overall duration of the works. Conversely 24-hour construction will mean that there are no quiet periods of 'downtime' during the project's construction. This is likely to result in localised 'avoidance' impacts by a variety of marine receptors including fishes, this should be acknowledged in the upcoming EIA.	Impacts on marine ecology features are considered for each topic in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology, Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology, Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** and **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology. Application Document 6.6 Habitats Regulations Assessment Report** has also been prepared.
Should unexploded ordnance (UXO) clearance activities be required as part of the seabed preparation work, then it is likely that underwater noise (UWN) modelling will be required to determine the range of impact from explosions and any potential overlap with the Thames/Blackwater herring spawning grounds at Herne Bay and the mouth of the Blackwater Estuary, and the Downs herring spawning ground in the southern North Sea. Fish should be assigned into one of the four categories according to their hearing capabilities as described in Popper et al. (2014) and should be treated as a stationary (not a fleeing) receptor) for the purpose of UWN modelling. Popper et al. (2014) also provides noise threshold guidelines for explosions.	A desk-based risk assessment has determined there to be a Moderate risk from encountering UXO within the Offshore Scheme. Prior to installation there will be a full UXO survey to determine the need for any explosive objects to be cleared. An application for a Marine Licence in respect of UXO clearance will be made post DCO submission, when the exact number and type of detonations have been established.
The MMO note that the results in 'Figure 4.9.2: Total Landed Weight (tonnes) and Value (£) of Catch by ICES Rectangle (2016 – 2020),' in Volume 1 Main Text, Part 4 Offshore Scheme, don't seem to correspond to what is stated in the text. This should be reviewed.	Noted, this has been updated for the Environmental Statement.
The MMO has noted that the Applicant is proposing to scope the cumulative and interrelated impacts for all marine receptors. A zone of influence (ZOI) of 31km has been used to identify these developments based on the potential inter-related acoustic impacts from detonation of UXO and piling. Please note that due to the large area over which UWN can propagate, a wider ZOI may be required for the assessment of cumulative and inter-related impacts arising from UXO and piling.	Prior to installation there will be a full UXO survey to determine the need for any explosive objects to be cleared. An application for a Marine Licence in respect of UXO clearance will be made post DCO submission, when the exact number and type of detonations have been established. During Scoping an overall cumulative assessment ZOI of 31 km was proposed. This was based upon the Offshore Scheme potentially resulting in disturbance effects of up to 5 km for marine mammals from geophysical surveys, and other developments which could have a disturbance effect up to 26 km (impact piling and high order unexploded ordnance (UXO) detonation). However, this is an iterative process, and it is acknowledged that there are a number of proposed offshore wind farm developments in the North Sea that, if progressed, would be undertaking piling activities which would have a larger ZOI in comparison to the activities for the Proposed Project. **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** presents the cumulative assessment for the Offshore Scheme.
3.6 Shellfish	
The MMO agrees with that all potential impacts the Proposed Development could have on shellfish have been scoped in and that the methods described are sufficient to inform an impact assessment.	Noted, no further response required
The MMO agrees that the impacts described in table 4.4.4 can be scoped out.	Noted, no further response required

Marine Management Organisation Comment	National Grid's Response
The MMO is content that a good range of data sources including project specific survey data and UK commercial fisheries landings by ICES rectangle. However, to improve the shellfish data the MMO would advise consultation with the respective Inshore Fisheries Conservation Authority (IFCA) who will be able to provide data for inshore shell fishers using boats under 10m which would otherwise be missed by the data sources planned for use.	KEIFCA and EIFCA were consulted in March 2023. A summary of vessel and gear specifications for the different methods used by inshore vessels in the study area can be found in **Application Document 6.3.4.8.A Appendix 4.8.A Commercial Fisheries Technical Report.** These were obtained through direct consultation with fishers and have been considered as part of the impact assessment.
3.7 Marine Mammals	
The MMO has provided comments on impacts on marine mammals from underwater noise below. The MMO defers to Natural England as the SNCB in relation to all other potential impacts to marine mammals.	Noted, no further response required
3.8 Underwater noise	
The MMO welcomes the commitment that impacts of underwater sound on marine mammals during construction, maintenance and decommissioning phases will be scoped in for further assessment. The MMO welcomes further discussion on any mitigation measures deemed necessary during the EIA process.	Noted, no further response required
It is noted that specific details of how the impacts of underwater noise on marine mammals will be assessed have not been provided at this stage. Desk based assessments should be supported by relevant, peer-reviewed literature where possible.	Impacts to marine mammals from underwater sound have been assessed in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
3.9 Archaeology / Cultural Heritage	
The MMO defers to Historic England on the suitability of the scope of the assessment with regards to archaeology and cultural heritage impacts.	Noted, no further response required.
3.10 Navigation / Other Users of the Sea	
The MMO recommends early engagement with any port authority where appropriate, to ensure that any mitigation measures regarding impacts on shipping and navigation are adopted appropriately.	Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** Port Authorities have been included as part of Stakeholder Consultation.
The MMO defers to the Maritime and Coastguard Agency and Trinity House on the suitability of the scope of the assessment with regards to navigation of vessels and the safety of other users of the sea.	Noted, no further response required.
3.11 Water Quality	
The MMO defers to The Environment Agency on the suitability of the scope of the assessment with regards to water quality.	Noted, no further response required.
3.12 Seabed / Land / Soil Quality	
If any bespoke sediment sampling is required/undertaken for sediment quality, these should adhere to the MMO guidelines, especially with regard to the selection of a validated laboratory.	Noted, no further response required.
The MMO would recommend the applicant utilise the Cefas Sediment Management Framework app (https://rconnect.cefas.co.uk/action_levels_tool/) to check if there have been any previous sampling undertaken within the vicinity of the scoping area and check the results which may indicate any areas of concern.	Noted, no further response required.

Marine Management Organisation Comment	National Grid's Response
It is recommended that the applicant provide a KML file or workbook of coordinates for the project area to allow a robust assessment to be undertaken at the time of submission.	Noted, no further response required.
The applicant should check the MMO's data portal and download the disposal site shapefile from https://data.cefas.co.uk/view/407 and provide justification within the subsequent environmental statement, regarding interference with other dredging and disposal operations.	Impacts to offshore dredging and disposal sites have been considered in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users.**
The applicant should note that a disposal site, or sites, may be required to be designated for the cable laying operations (either pre-sweeping, cable laying and or post cable burial) and should consider this in their environmental impact assessment, and record any findings in the subsequent environmental statement.	Impacts to offshore dredging and disposal sites have been considered in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users.** Sediment disturbed by the Proposed Project will be left in situ within the Order Limits.
3.13 Population and Human Health	
The MMO defers to the Local Authority and UK Health Security Agency on the suitability of the scope of the assessment with regards to population and human health impacts	Noted, no further response required.
3.14 Cumulative Impacts & In-Combination Impacts	
The MMO is content with the proposal for cumulative impacts and in combination impacts.	Noted, no further response required.
3.15 Other	
The MMO note the 'Need for an Environmental Impact Assessment' in Volume 1, Part 1 of the Scoping Report support the approach taken by the Applicant despite none of the components which make up the Proposed Development being explicitly identified under Schedule 1 or 2 of EIA Regulations.	Noted, no further response required.
The applicant has correctly identified that the proposed development is within the East Inshore and the South East Inshore Marine Plan areas. The MMO expects the Applicant to produce a standalone document to demonstrate all relevant marine plan policies have been considered, as well as provide a statement whether the Proposed Development is compliant with the two separate marine plans.	This has been covered in **Application 7.1 Planning Statement** for the Proposed Project.
Conclusion	
The MMO has reviewed the Scoping Report and has provided advice for the applicant, noted corrections to be made, and also included comments that the MMO would expect to be addressed in the ES.	Noted, no further response required.
This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and programme of the Proposed Development, other work may prove necessary.	Noted, no further response required.

1.22 Maritime and Coastguard Agency

Table 1.21 Maritime and Coastguard Agency

Maritime and Coastguard Agency Comment	National Grid's Response
This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and programme of the Proposed Development, other work may prove necessary.	Noted, no further response required.
Thank you for your email dated 25 October 2022 inviting comments on the Scoping Report for the proposed Sea Link Project. The Scoping Report has been considered by representatives of UK Technical Services Navigation, and the MCA would like to respond as follows:	Noted, no further response required.
We note that the project would comprise of the following elements: • Underground HVAC cable between the proposed Friston substation and a new converter station in Suffolk. • New converter station in Suffolk. • Underground HVDC cable between a new converter station in Suffolk and a landfall on the Suffolk coast, either between Aldeburgh and Thorpeness or at Sizewell Gap. • Marine HVDC cable between a landfall on the Suffolk coast and a landfall in Pegwell Bay in Kent. • Underground HVDC cable between a landfall in Pegwell Bay and new converter station in Kent. • New converter station in Kent. • A HVAC connection (either by overhead line or underground cables) between a new converter station in Kent and the existing Canterbury to Richborough overhead line.	Noted, no further response required.
The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations.	Noted, no further response required.
The MCA would expect any works in the marine environment to be subject to the appropriate marine licensing and planning consents before carrying out any marine licensable works. We note that the project will fall under Marine and Coastal Access Act 2009, and will cover all installation, commissioning, operational, maintenance and decommissioning activities of the project.	The DCO submission considers all relevant impacts to the marine environment with a deemed Marine Licence to be secured prior to starting works.
The development area carries a significant amount of through traffic to major ports, with a number of important international shipping routes in close proximity, and IMO routing measures. Attention needs to be paid to changes in vessel routing, particularly in heavy weather ensuring shipping can continue to make safe passage without large-scale deviations, and any reduction in navigable depth referenced to chart datum.	Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** These aspects have been included as part of Stakeholder Consultation and the assessment itself.
We note the commitment to undertake a Navigation Risk Assessment (NRA) with supporting marine traffic surveys. The NRA should establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). A marine hazard identification workshop would also be welcomed as part of the NRA.	Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation. Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment** identifies project phases and assesses the impacts each phase has on shipping and navigation. Hazard identification workshops were conducted, where risks were assessed and appropriate reduction measures recommended. The assessment output provides a vehicle for tracking / managing risks and impacts. (Note that the NRA does not establish how the phases shall be managed. This is not within the scope of the assessment however the output may inform that process.)
A range of potential project impacts on shipping and navigation have been identified which could occur during the construction, operation and maintenance, and decommissioning phases of the Proposed Development.	Noted, no further response required.

Maritime and Coastguard Agency Comment	National Grid's Response
We note that the shipping and navigation chapter of the Environmental Statement will consider the potential impacts of the construction, operation and maintenance and decommissioning phases of the project within the shipping and navigation study area and will follow the IMO Formal Safety Assessment methodology. The information from the NRA will be fed into the shipping and navigation chapter. The MCA would expect the Environmental Statement to detail the possible impact on navigational issues for both commercial and recreational craft, specifically: ▪ Collision Risk ▪ Navigational Safety ▪ Visual intrusion and noise ▪ Risk Management and Emergency response ▪ Marking and lighting of site and information to mariners ▪ Effect on small craft navigational and communication equipment ▪ The risk to drifting recreational craft in adverse weather or tidal conditions ▪ The likely squeeze of small craft into the routes of larger commercial vessels.	**Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation** covers Collision Risk and any other potential impacts on shipping including small craft. The assessment output provides a vehicle for managing or tracking the risks. However the assessment is based on 'embedded' risk reduction measures covering appropriate Emergency Response arrangements and site marking and lighting. Detailed Acoustic or visual intrusion aspects, above the general disruption of the project presence, are outside the scope of the assessment. Visual intrusion and noise have been assessed within **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users.**
We note the potential for a reduction of under keel clearance, which will be scoped into the assessment. Safe realistic under keel clearance (UKC) assessment should be undertaken for the maximum drafts of vessel both observed and anticipated. The MCA's Under Keel Clearance Policy paper can be found at the following link: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/373456/Under_Keel_Clearance_paper_May_14_-_FINAL.pdf	Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**. Under-keel clearance has been discussed with the MCA and appropriately addressed as part of **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment.** Recommendations have been made to address potential risks associated with under-keel clearance.
Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and, subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase. Where this is not achievable, the licencee must discuss further with the MCA and Trinity House.	A Burial Protection Index Study has not been carried out. Collision Risk Burial Assessment (CBRA) and Burial Assessment Study (BAS) have been undertaken which present Anchor Strike Risk based on Anchor Penetration Studies in the public domain. Note that the BAS has included scenarios which are caveated on the different installation techniques which may be suitable to the corridor to mitigate risks from Anchor Strike (as per CBRA), but without a final installation technique identified (to be decided by Marine Installation Contractor after consent and procurement phases are completed), this document will not be definitive. The assessment presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation** and **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment** is based upon a risk based burial approach, with recommended target burial depth, to ensure minimal reduction in depth as far as practicable. The burial risk assessment includes anchor penetration assessment and burial protection requirements and approach. The NRA is based on assumed or prescribed protection measures and extent assumptions. The results may be used to inform refinement or changes to protection extents and measures through comparison with vessel activity locations and protection arrangements. Note however it is not generally within the scope of the NRA to directly establish such requirements / approaches.
A study should be undertaken to establish the electromagnetic deviation, affecting ship compasses and other navigating systems, of the high voltage cable route to the satisfaction of the MCA. On receipt of the study, the MCA reserves the right to request a deviation survey of the cable route post installation.	**Application Document 6.5 Electric and Magnetic Field Compliance Report** should be referred to for assessment of potential electromagnetic deviation. Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**, assessment of electromagnetic deviation is outside the scope of the NRA however compass deviations shall be addressed broadly and deviation extents incorporated.
We note in the report that as the design progresses, further assessments will be undertaken in order to assess the subsea cables protection against shipping and fishing activities (anchoring and trawling). Rock protection could potentially be utilised to cover the cable pending assessment from marine traffic and the NRA.	Impacts to shipping and navigation are presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment** addresses

Maritime and Coastguard Agency Comment	National Grid's Response
	trawling and anchoring activity and locations. Where appropriate conclusions regarding protection extents have been drawn, however the NRA does not directly establish protection requirements.
We note that the potential effects related to the construction, operation and maintenance, and decommissioning of the Proposed Development on shipping and navigation will assess the potential cumulative effects that could occur, related to alternate projects and/or activities that take place within the development area.	Cumulative effects have been addressed where appropriate as part of **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment.**
The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the NRA and further stakeholder consultation. We note that no impacts are proposed to be scoped out of the assessment related to infrastructure and other sea users.	No effect related to impact to shipping and navigation has been scoped out of the assessment in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**. However, future vessel movements are not simulated therefore purely qualitative assessments are made in that regard.
Finally, we would expect emergency response arrangements to be considered as part of this project on the potential impacts to search and rescue (SAR) and emergency response in the area, to ensure there are no impacts on SAR operations.	**Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment** includes an assessment of the existing SAR arrangements in the region, including consideration of RNLI stations and lifeboats, and historic incidents. The impact assessment will identifies any potential impacts to these arrangements where evident. It is not within the scope of the NRA to establish SAR requirements for the project activities.

1.23 Ministry of Defence

Table 1.22 Ministry of Defence

Ministry of Defence Comment	National Grid's Response
Proposal: South East Anglia Link. The Sea Link project consists of; 1. Constructing a new converter station within 5km of the proposed Friston substation then HVAC underground cables between the substation and a converter station and then HVDC underground cables between the converter station and the coast; 2. Constructing a new offshore HVDC cable between Suffolk and Kent. 3. Constructing a new converter station within 5km of the existing Richborough substation with HVDC underground cables between the converter station and the coast at Pegwell Bay.	Noted, no further response required.
Location: Land from the Sizewell area in Suffolk to Richborough in Kent with a sub-sea cable between connection	Noted, no further response required.
Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on the 25/10/2022.	Noted, no further response required.
The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.	Noted, no further response required.
The applicant is seeking a Scoping Opinion in order to obtain information to inform an Environmental Statement (ES) relating to the Proposed Development.	Noted, no further response required.
Two converter site option areas were identified within the routing and siting study area. Area A is located adjacent to and encompassed by Richborough Energy Park and Area B is located to the north and south of the A299 and adjacent to Manston Business Park. The Area B location occupies the statutory safeguarding zone surrounding the Ministry of Defence (RAF Manston) Technical Site Direction 2017. In particular, the technical safeguarding zone surrounding the Ministry of Defence (RAF Manston) Technical Site Direction 2017. and is approximately 0.8km from the centre of the asset.	Noted, no further response required.
The safeguarded technical installation is a High-Resolution Direction Finder (HRDF) air navigational aid. The HRDF is used to precisely locate transmissions from aircraft and supports the delivery of air traffic control functions. However, its key role is to precisely locate transmissions from emergency transponder beacons on aircraft (both military and civilian) or military aircrew that have bailed out of their aircraft. In this role the HRDF mast serves as an integral part of a UK wide network (the UK Diversion and Distress Facility) which is used to locate aircraft or personnel and direct rescue services. Maintaining the operational effectiveness of this technical installation is therefore critical to maintaining the UK emergency response capabilities for the management of air safety incidents.	Noted, no further response required.
The applicant should be advised to take account of the current published MOD Practice And Exercise Areas (PEXA) in preparation of their development proposal. The MOD has highly surveyed areas which maybe relevant to the installation of the export cables & associated infrastructure. The MOD would like to be consulted at the next stage of this application. Once further information is submitted, the MOD requests that we are consulted again in order to complete a more detailed technical assessment.	Noted. Only one military practice and exercise area (Kentish Knock) intersects the Offshore Scheme boundary for 0.4 km^2. The MOD will be notified prior to any activities taking place in military practice and exercise areas. Full details will be available in the DCO EIA application for MOD consideration.

Ministry of Defence Comment	National Grid's Response
In order to conduct further assessment, grid references both in latitude and longitude (degrees, minutes and seconds) and also Easting and Northing (BNG) for the proposed export cable will be required.	Detailed Location and Work Plans of the Offshore Scheme are presented in **Application Document 2.2.1 Overall Location Plan** and **Application Document 2.5.3 Work Plans-Offshore.**
Having reviewed the documents provided with this consultation we acknowledge that this is at the scoping stage of the proposal and therefore full details of the proposed plans are not available. The MOD will need to complete a more detailed assessment on the potential impacts of this proposal on technical assets at the Ministry of Defence (RAF Manston) Technical Site Direction 2017, once more detailed information is submitted. Further assessment will also be necessary to determine the potential for this development to limit or otherwise restrict offshore defence activity and/or MOD navigational routes.	Noted, no further response required.
In summary, at this stage of the consultation process, the MOD advises we will need to complete a more detailed assessment once plans and further information become available. Once further information is submitted, the MOD requests that we are consulted again via the above email address in order to complete the necessary safeguarding assessments.	Noted, no further response required.
The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed above and in the emailed documentation titled EN020026 - Sea Link - EIA Scoping Notification and Consultation dated 25/10/2022	Noted, no further response required.
Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response	Noted, the MOD has been consulted with since publication of the EIA scoping Report as part of Statutory Consultation.

1.24 Natural England

Table 1.23 Natural England

Natural England Comment	National Grid's Response
Approach to EIA scoping	
Natural England (NE) welcome the information provided in the Scoping Report. It must be noted that the Scoping Report is high level and based on a large area of search, in particular the location of landfall and converter sites in the Suffolk Onshore Scheme. Therefore, in the absence of sufficient information, it is difficult to provide targeted advice, including impacts on saltmarsh habitats at landfall locations. Furthermore, we also wish to fully understand the equal weighting of environmental factors used in the selection process for the preferred routes. The route selection approach and environmental factor weighting should be made more transparent and explained more clearly.	In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure. For full details on how the design has evolved and the consideration of alternatives please refer to **Application Document 6.2.1.3 Part 1 Inroduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report.**
Our advice is, therefore, based on the information available at this time and at this stage of the EIA process. In order to assess potential impacts on designated sites, will require further information on, but not limited to; cable burial assessments; requirement for external cable protection; number of cables; proposed mitigation; feasibility of horizontal directional drilling (HDD) to avoid coastal impacts. We hope that some of this evidence will be available in the future and we look forward to having further opportunities to provide our comments.	Noted. Horizontal Direct Drilling is the technique which will be used to traverse Thanet Coast & Sandwich Bay SPA.
As noted above, the information provided in the Sea Link EIA Scoping Report is very high-level. We note that there is very little information on the assessment of impacts to designated sites, how this will be undertaken, what information will be needed, and what impacts should be taken into account; namely Habitats Regulation Assessments (HRA) and Marine Conservation Zone (MCZ) Assessments. Therefore, we recommend that impacts on designated sites should be thoroughly assessed, and the best available evidence used to inform these assessments.	Noted. A full ES and HRA (Application Document 6.6 Habitat Regulations Assessment Report) has been produced for the DCO submission.
The current draft National Policy Statement (NPS) indicates coordination where possible and reconsultation is expected shortly. Natural England therefore recommend that the Environmental Statement should have consideration of anything in the revised NPS. We advise that early consideration should be given to policies in draft NPS updates in case these are adopted and this will protect the project from unexpected changes that could be required of them later in the application process.	All technical discipline ES chapters have referenced the NPS policies where relevant. Please see **Application Document 6.2.1.2 Part 1 Introduction Chapter 2 Regulatory and Planning Context** for further details.
There is a risk with premature EIA scoping, and submission of the Preliminary Environmental Information Report (PEIR) prior to the completion of the data collection and analysis, that consenting issues are identified late in the day and are not resolved in advance through preapplication discussions or data collection, and that Examinations are then unable to resolve these issues. This runs counter to the increased emphasis on 'front-loading' issues in the NSIP process, and the ambition of the British Energy Security Strategy as regards speeding up the consenting process.	National Grid have sought to engage with stakeholders through pre-application discussions. Following the submission of the Preliminary Environmental Information Report (PEIR) and the subsequent statutory consultation, National Grid have committed to ongoing engagement with stakeholders, including a programme of thematic meetings on various environmental topics, addressing specific aspects of the project design and potential impacts arising during construction and operation. These have sought to resolve points with various stakeholders prior to the Examination.
In addition, Natural England highlight the risk that any additional data analysis later in the application process has the potential to change the conclusions of the ES from those set out in the PEIR. This could lead to delays to the project programme, both during consenting and/or in the preconstruction phase. More generally, Natural England advises that 24 months of survey effort is the minimum expected for bird and marine mammal data collection, in order to provide an adequate baseline upon which to draw conclusions and inform impact assessments and any requirements for mitigation.	Noted, no further response required.
Cumulative Impacts	

Natural England Comment	National Grid's Response
The cumulative effect of developments within the Zone of Influence (ZoI) of the proposed scheme should be adequately assessed in the Scoping Report, particularly with regards to Suffolk Coasts and Heath AONB (SCHAONB), Pegwell Bay and the offshore cable route. There are multiple ongoing and proposed projects which have the potential to interact with Sea Link and create cumulative adverse impacts on the environment such as: • in combination with Sizewell C Nuclear Power Station developments in Suffolk Coasts and Heaths AONB and the Suffolk Heritage Coast, • the offshore wind and interconnector cables which Sea Link could potentially cross and thus lead to impacts on benthic habitats, • the combined impacts of cables landing in saltmarsh habitat at Pegwell Bay. 3 • the interaction between Sea Link and Euro Link, as these two projects appear to have very similar scopes, bringing electricity cables onshore in Suffolk and linking them into the National Grid onshore network. Both projects have considered a range of landfall options and it seems sensible to consider linking these landfall options and infrastructure to minimise the impacts on the coast within Sites of Special Scientific Interest (SSSIs), the overlapping international conservation designations (Special Areas of Conservation (SAC)/ Special Protection Areas (SPAs)), the SCHAONB, the Suffolk Heritage Coast and other identified areas of importance such as ancient woodlands.	The Inter Project Cumulative Assessments for Suffolk, Kent and the Offshore schemes outlines the in-combination effects of the developments outlined against Sea Link alongside with others. This has been reflected in the ES and HRA. For further details please refer to: **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** **Application Document 6.2.4.11 Part 4 Chapter 11 Inter-Project Cumulative Effects** Application Document 6.6 Habitats Regulations Assessment
We also strongly encourage a thorough cumulative review of National Grid's projects be carried out to assess their impacts on protected sites, species and habitats of importance, and ensure that they do not provide pathways whereby nature can deteriorate.	Noted, a cumulative impact assessment has been included within the Environmental Statement, please refer to **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
Landscape Impacts (Suffolk Coasts & Heaths AONB and Suffolk Heritage Coast	
Natural England is concerned about the potential for adverse effects on the statutory purpose of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SCHAONB), which is a nationally designated landscape, given the location of the Applicant's preferred landfall site, onshore cable route and preferred converter site are within SCHAONB. Therefore, an assessment should be completed on the potential impacts of the project on the statutory purpose of SCHAONB. We wish to emphasise that the statutory purpose of SCHAONB is to both conserve and enhance natural beauty. The enhance part of the statutory purpose should also inform an assessment of cumulative effects. The expectation should be that opportunities to reverse a decline in natural beauty should be sought, rather than the area being able to accommodate more development which: • further limits or closes down future enhancement opportunities • further erodes, in combination with existing development, the capacity of the affected area to contribute to the delivery of the statutory purpose, or even to detract from SCHAONB as a whole.	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual,** specifically within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment.** Cumulative landscape and visual effects are presented in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Inter-Project Cumulative Effects.** The enhanced duty to further the purposes of the AONB are referred to within **Application Document 7.1 Planning Statement.**
Natural England are concerned with the location of landfall and the location of the preferred converter site option 1, with option area E, to be within SCHAONB. Natural England have a preference for the converter site option 3 which is located outside of SCHAONB. The risk of using converter site option 1 should be fully assessed with equal weighting of the environmental factors. We advise that there should be clear confirmation that the value of SCHAONB's landscape and the sensitivity of its landscape and visual receptors should be given the highest rating within the Landscape and Visual Impact Assessment (LVIA).	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The Saxmundham Converter Station site is not located within the AONB. The landfall would be constructed by a trenchless technique retaining the integrity of the AONB along the foreshore. The remaining section of HVDC corridor would be fully reinstated.
Additionally, the effects of the coastal elements of the project will directly impact on the Suffolk Heritage Coast. An assessment of the project's impacts on the Suffolk Heritage Coast should therefore be provided. The purpose of a Heritage Coast is to define a stretch of undeveloped coastline, however this section of the Suffolk Heritage Coast is under pressure from the development of energy infrastructure	The effects of the Suffolk Onshore Scheme on the Suffolk Heritage Coast is included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** Consideration is also given regarding cumulative effects with other projects which should be

Natural England Comment	National Grid's Response
	referred to within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Suffolk Onshore Preferred Route(s)	
The Scoping Report for the Suffolk Onshore Scheme encompasses a large area and is high level due to the route options, landfall and converter site locations still being considered. We encourage refinement of the site and route options, with avoidance of protected habitats and species, including Ancient Woodland, being considered as a priority. Where protected sites cannot be avoided, after equal weighting against other constraints, the sensitivity of habitats must be fully assessed, for example habitat and species recoverability, to reduce the impacts on protected features. We cannot, at this stage, provide targeted advice on protected species and habitats, due to broad scope of the Suffolk Onshore Scheme, and without detailed survey methodology within a confined route. We recommend that species and habitats are appropriately surveyed within the cable route, converter site and substation locations, along with functionally linked land, supporting habitats and buffer zones. We encourage engagement with local conservation groups, such as Suffolk Wildlife Trust and RSPB, for updated species records.	Noted. A full suite of protected species surveys has been undertaken and ancient woodland has been avoided. Methods for less disruptive works within important sites (e.g. HDD) has been undertaken. Natural England have been kept appraised of survey work progress. For further detail please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity.**
Without refinement of the scoping area and routes, and without detail on construction techniques and Horizontal Directional Drilling (HDD) feasibility, it is difficult to advise on which option would cause the least impact. Natural England's preferred approach for cable landing would be a 4 trenchless technique, however we are concerned that the preferred landfall options go through designated sites without HDD feasibility being confirmed. We recommend that the applicant considers worst-case scenarios when assessing the impact of the project on protected and important habitats and species, including protected sites and their designated features. We would welcome the inclusion of a map which details protected habitats and designated sites alongside the different cable routes, substation, and converter site options, as the figures provided only show this detail for the S2 and S3 landfall options.	Noted. Meetings have been held with Natural England and it has been confirmed a trenchless technique for crossing the SSSI at a depth that it will not affect the surface interest features is feasible.
Kent Onshore Preferred Route	
Natural England is concerned that there is the potential for adverse impacts associated with a preferred landfall in Pegwell Bay, considering the various protected sites within and adjacent to it. The assumption that any impacts on these sites and their designated features is temporary relies solely on the use of trenchless drilling methods, such as HDD, being feasible. However, the feasibility of HDD has not yet been confirmed. Therefore, we would welcome a commitment register with the commitment of trenchless techniques at Pegwell Bay and a feasibility study for trenchless drilling through Pegwell Bay. We would expect the Applicant to consider lessons learnt from previous projects, such as Nemo Link interconnector cable and Thanet Offshore Windfarm, if the preferred landfall at Pegwell Bay progresses. If HDD is shown not to be feasible for Pegwell Bay, we would advise that alternative landfall options be carefully considered, so that impacts to designated sites are avoided.	HDD feasibility has been confirmed and this information has been shared with Natural England. Surface works in the saltmarsh which caused greatest disturbance to the SPA for Nemo Link will therefore be avoided for Sea Link. The Full Proposed Project description is contained within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Natural England welcome National Grid's Biodiversity Net Gain (BNG) commitment and have included BNG guidance for Nationally Significant Infrastructure Projects (NSIPs) in Appendix C.	Noted, no further response required.
Marine Processes	
Natural England's overarching advice when selecting a cable route, is to use the avoid, reduce, mitigate hierarchy, in order to reduce environmental impacts. The proposed cable route currently passes through a number of protected areas and our preference would be, in the first option, to avoid these protected areas entirely. We also advise that this hierarchy should be used when considering construction activities, cable installation techniques and seabed preparation methods. Construction works, in shallow nearshore waters or within/near protected sites, that minimise seabed disturbance and the need for cable protection measures should be used, where possible. Total area of impact (direct and indirect) footprint should be provided for cable installation activities, and volumes of cable protection measures estimated. We would also advise that seabed mobility, temperature and salinity, sedimentology and sedimentary environments,	**Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** presents the rationale for each of the landfall sites and marine alignment. **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** presents a baseline characterisation of seabed mobility, temperature and salinity, sedimentology and sedimentary environments, bedform dynamics and stability, and sediment transport pathways

Natural England Comment	National Grid's Response
bedform dynamics and stability, and sediment transport pathways and rates should also be investigated as part of the baseline characterisation. Furthermore, consideration should be given to a number of other receptors in this assessment, including significant morphological features such as mobile sandbanks, channels, the coastline(s), for example cliffs, dunes, saltmarsh, mudflats), and designated sites. There are also a number of potential significant effects which we would advise giving consideration to, including smothering of adjacent seabed, change of sediment type and persistence, modifications to sediment transport patterns and resulting morphological change.	and rates in the Study Area. Consideration has also been given to significant morphological features within this chapter and assessed as appropriate.
Benthic Ecology	
In the absence of detailed construction techniques, we advise that underwater sound disturbance remains scoped in at this stage. Furthermore, we also advise that electromagnetic field (EMF) impacts remain scoped in for benthic ecology. Other information which will be expected, includes but is not limited to, the footprint of area affected by excavation for and laying the subsea cable, area affected by any potential external cable protection, estimation of EMF at the exterior of cables as well as at the surface above buried cables, cable laying and maintenance associated vessels. We advise that until more information is provided, such as the data from the intertidal benthic surveys at landfall locations (planned for 2023), we are unable to provide detailed advice on such matters. Furthermore, we recommend that best practice is followed when undertaking surveys and that you liaise with us regarding the planning on these surveys.	Impacts to benthic ecology were addressed in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Benthic Ecology** of the PEIR, and also in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology** of the ES where Underwater sound and EMF have been scoped in.
Natural England are also concerned about the proposed route through Goodwin Sands Marine Conservation Zone (MCZ), which is designated for benthic habitats and species, including Sabellaria spinulosa reefs, which are particularly sensitive to construction on the seabed and present low resilience to habitat changes. We encourage sufficient surveys to be carried out in 5 protected sites within the cable route to assess the presence of sensitive habitats and species. If, after careful weighting of environmental considerations, Goodwin Sands MCZ cannot be avoided, Natural England advise that the sensitive features of the site are avoided. Given recent decisions on NSIPs with similar impacts to designated sites we advise that there may be a need to discuss the production of an in principle Measures of Equivalent Environmental Benefit (MEEB) plan. Natural England is willing to work with the applicant during the pre-application phase to further discuss this issue.	The Offshore Scheme Boundary at Area 5 has been refined to avoid the western boundary of the Goodwin Sands MCZ. The corridor now runs parallel to this designated site for approximately 3.2 km.
Fish and Shellfish Ecology	
Natural England is pleased that a number of pathways for impact have been scoped in for fish and shellfish ecology. However, we recommend that changes in water quality are scoped in, as well as potential disturbance to habitats and species through the creation of new habitats. We are concerned about the potential for the works to impact fish and shellfish which spawn on the seabed in the study area and recommend sensitive periods are identified. We would like to highlight that, although MCZs within the study area are not designated for migratory fish, the impacts of the proposed works on migratory routes should be considered. There should also be consideration of potential impacts on poor cod, Mediterranean scaldfish and cephalopods. We cannot comment in detail on the impacts on fish and shellfish ecology due to the high-level information provided in the scoping report, however we look forward to engaging with the Applicant for future reports and assessments. The Applicant should be mindful of closed shellfish areas and areas closed to bottomtowed fishing gear, which are specified in our detailed comments in Appendix B. The relevant IFCA authorities can be contacted for more information and the following webpage provides detail on Marine Management Organisation (MMO) and Inshore Fisheries and Conservation Authorities (IFCA byelaw) areas View all Restrictions (kingfisherrestrictions.org).	The updated approach to screening, particularly for migratory fish species in designated sites is detailed in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.** Comments from Natural England have been considered when screening in designated sites. A meeting to discuss fish and shellfish scoping opinion comments was attended on the 31 May 2023.
Marine Mammals	
The most significant potential for impact on marine mammals from this project comes from underwater noise associated with UXO (unexploded ordnance) clearance (and to a lesser extent from geophysical	Prior to installation there will be a full UXO survey to determine the need for any explosive objects to be cleared. An application for a Marine Licence in respect of UXO clearance will be

Natural England Comment	National Grid's Response
surveys), especially as the cable route is partially in the Southern North Sea (SNS) Special Area of Conservation (SAC) for harbour porpoises. When assessing the project for potential impacts on marine mammals, we recommend that the applicant review the most up to date literature and evidence, such as Carter et al 2022 for seals, to ensure that the appropriate screening distance has been used. We will continue to engage with the applicant through the pre-application phase to provide further advice for future reports and assessments.	made post DCO submission, when the exact number and type of detonations have been established.
Red Throated Diver (RTD)	
Natural England's primary point of concern is regarding the potential for displacement of red throated diver, a designated feature of the Outer Thames Estuary Special Protection Area (SPA). Works should be timed to avoid the overwintering period, especially the months of January March should be avoided. The impacts from these works will require assessment as part of any Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA) processes. If it is not possible to avoid the overwintering period, then the extent of the potential displacement on red throated diver, using a methodology agreed with Natural England, needs to be carried out as soon as possible to enable a full assessment of the impact on all the OTE's conservation objectives. This should be presented in the Environmental Statement/information to inform the Habitats Regulations Assessment. If construction was to take place in the Outer Thames SPA during the overwintering period, Natural England anticipate the need for significant mitigation. Should displacement effects on the SPA still not be reduced to a level where there is no contribution to incombination effects, the Applicant will need to present a derogations case and bring forward compensatory measures. Further concerns are on the clarity of which designated species are considered scoped in and if operational and maintenance impacts have been scoped in. We will continue to engage with the applicant through the pre-application process to provide further advice on all issues.	For red-throated diver, the Proposed Project is committing to a full seasonal restriction (1st November – 31st March) for offshore cable installation activities in the Outer Thames Estuary SPA and a reduced seasonal restriction (1st January – 31st March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. This will be in place for the purpose of assessing against cumulative effects, rather than the Proposed Project on its own. For further detail please refer to **Application Document 6.2.1.5 Part 4 Marine Chapter 5 Ornithology**.
Please see Annex A for guidance on EIA requirements. In Annex B we provide detailed comments on the project-specific aspects of the scoping report. Please see Annex C for Biodiversity Net Gain (BNG) guidance for Nationally Significant Infrastructure Projects (NSIPs).	Noted, no further response required.
General Principles	
Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (Regulation 10) sets out the necessary information to assess impacts on the natural environment to be included in an Environmental Statement (ES), specifically: • A description of the development – including physical characteristics and the full land/marine use requirements of the site during construction and operational phases. • Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development. • An assessment of alternatives and clear reasoning as to why the preferred option has been chosen. • A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape/seascape and the interrelationship between the above factors. • A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment. • A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment. • A non-technical summary of the information.	Noted, the aspects listed are included within the following documents which reference each bullet point: • **Application 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project;** • **Application Document 6.2.2.1 to Application Document 6.2.2.11; Application Document 6.2.3.1 to Application Document 6.2.3.11 and Application Document 6.2.4.1 to Application Document 6.2.4.9;** • **Application 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered;** • **Application Document 6.2.2.1 to Application Document 6.2.2.11; Application Document 6.2.3.1 to Application Document 6.2.3.11 and Application Document 6.2.4.1 to Application Document 6.2.4.9;** • **Application Document 6.2.2.1 to Application Document 6.2.2.11; Application Document 6.2.3.1 to Application Document 6.2.3.11 and Application Document 6.2.4.1 to Application Document 6.2.4.9;** • **Application Document 6.2.2.1 to Application Document 6.2.2.11; Application Document 6.2.3.1 to Application Document 6.2.3.11 and Application Document 6.2.4.1 to Application Document 6.2.4.9;**

Natural England Comment	National Grid's Response
• An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information	• **Application Document 6.1 Non Technical Summary; and** • **Application Document 6.2.2.1 to Application Document 6.2.2.11; Application Document 6.2.3.1 to Application Document 6.2.3.11 and Application Document 6.2.4.1 to Application Document 6.2.4.9.**
It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment	Noted, A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
Ecological Aspects of an Environmental Statement	
Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.	Noted, no further response required.
EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.	Noted, no further response required.
The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers.	Noted, no further response required.
Internationally Designated Sites	
The ES should thoroughly assess the potential for the proposal to affect designated sites. Internationally designated sites (e.g. designated Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition, Paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to 8 compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.	Noted. **Application Document 6.6 Habitat Regulations Assessment Report** accompanies the DCO.
Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.	Noted, no further response required.
Further information on the special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available on our website https://designatedsites.naturalengland.org.uk	Noted, no further response required.

Natural England Comment	National Grid's Response
The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.	Noted, no further response required.
The emerging preference for the offshore cable corridor falls within the following internationally designated nature conservation: • Southern North Sea SAC • Outer Thames Estuary SPA	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The emerging preference for the Kent Onshore converter stations, landfall, and cable corridors fall within the following internationally designated nature conservation sites: • Sandwich Bay SAC • Thanet Coast & Sandwich Bay SPA • Thanet Coast & Sandwich Bay RAMSAR • Thanet Coast SAC	Noted, please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The emerging preference for the Suffolk Onshore converter stations, landfall, and cable corridors fall within the following internationally designated nature conservation sites: • Sandlings SPA	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The development site's study area overlaps with, and may have the potential to impact, the following internationally designated nature conservation sites:	Noted, no further response required.
Within the Offshore section • Margate and Long Sands SAC	Sandbanks within Margate and Long Sands SAC will be avoided. Natural England's advice has been taken into consideration, recoverability of features has been considered within the assessment **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology.**
Within the Kent Onshore section • Stodmarsh SAC • Stodmarsh SPA • Stodmarsh RAMSAR	Noted, please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
Within the Suffolk Onshore section • Alde-Ore Estuary SPA • Alde-Ore Estuary Ramsar • Alde-Ore & Butley Estuaries SAC • Minsmere to Walberswick SPA • Minsmere to Walberswick Ramsar • Minsmere to Walberswick Heaths & Marshes SAC • Orfordness Shingle Street SAC • Staverton Park & The Thicks, Wantisden SAC • Dew's Pond SAC	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The following internationally designated nature conservation sites are in the screening distance for marine mammals and may need to be assessed for connectivity to the study area: • Moray Firth SAC • Humber Estuary SAC • Bancs des Flandres SAC • Ridens et Dunes Hydrauliques du Détroit du Pas-de Calais SAC • Vlaamse Banken SAC • Baie de Canche et Couloir des Trois Estuaires SAC • Vlakte van de Raan SAC • Estuaires et Littoral Picards (Baies de Somme et d'Authie) SAC • Voordelta SAC • Wash and North Norfolk Coast SAC • Grevelingen SAC	A Transboundary Effects Section has been included within each marine topic chapter in the ES.
Please note: As the cable corridor is currently a study area, at this stage we are unable to provide a more definitive list of sites relevant to the project's assets. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects. Internationally designated site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216	Noted, no further response required.
Habitats Regulations Assessment	
If the proposal outlined within the scoping document has the potential to significantly affect features of the internationally designated sites and the activity is not directly connected to the management of any designated site, it should be assessed under regulation 63 the Conservation of Species and Habitats Regulations (2017). Should a Likely Significant Effect on an Internationally designated site be identified or be uncertain, the competent authority (eg. the Marine Management Organisation or Local Planning	Noted. **Application Document 6.6 Habitat Regulations Assessment Report** accompanies the DCO.

Natural England Comment	National Grid's Response
Authority or Government Department) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.	
If during the EIA process the potential for a Likely Significant Effect on the conservation objectives of the sites cannot be ruled out the competent authority for the marine licence (MMO / Government Department) should undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives. Noting recent case law (People Over Wind3) measures intended to avoid and/or reduce the likely harmful effects on a European Site cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site, therefore consideration is required at Appropriate Assessment. Natural England wishes to be consulted on the scope of the Habitats Regulations Assessment and the information that will be produced to support it and should be formally consulted on any Appropriate Assessment provided for the proposal (Regulation 63).	Noted. **Application Document 6.6 Habitat Regulations Assessment Report** accompanies the DCO.
Nationally Designated Sites, inc. Sites of Special Scientific Interest (SSSI) and Marine Conservation Zones (MCZ's)	
Sites of Special Scientific Interest (SSSIs)- Further information on the location of SSSIs and their special interest features can be found at www.magic.gov.uk. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.	Noted, no further response required.
The emerging preference for the Kent Onshore converter stations, landfall, and cable corridors fall within the following nationally designated nature conservation sites: • Sandwich Bay to Hacklinge Marshes SSSI • Thanet Coast SSSI	Noted, please refer to **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The emerging preference for the Suffolk Onshore converter stations, landfall, and cable corridors fall within the following nationally designated nature conservation sites: • Leiston - Aldeburgh SSSI • Sizewell Marshes SSSI	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The development site's study area overlaps with, and may have the potential to impact, the following nationally designated nature conservation sites within the Suffolk onshore scheme: • Alde-Ore Estuary SSSI • Minsmere to Walberswick Heaths & Marshes SSSI • Sandlings Forest SSSI • Iken Wood SSSI • Blaxhall Heath SSSI • Gromford Meadow SSSI • Snape Warren SSSI	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology** and **Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
Marine Conservation Zones - Marine Conservation Zones are areas that protect a range of nationally important, rare or threatened habitats and species. You can see where MCZs are located and their special interest features on www.magic.gov.uk. Factsheets that establish the purpose of designation and conservation objectives for each of the MCZ's are available at https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england	Noted, no further response required.
The emerging preference for the offshore cable corridor falls within the following nationally designated nature conservation: • Goodwin Sands MCZ • Thanet Coast MCZ	The Offshore Scheme Boundary at Area 5 has been refined to avoid the western boundary of the Goodwin Sands MCZ. The corridor now runs parallel to this designated site for approximately 3.2 km. The route does not go through Thanet Coast MCZ.
The development site's study area overlaps with, and may have the potential to impact, the following nationally designated nature conservation sites within the offshore scheme: • Kentish Knock East MCZ • Orford Inshore MCZ • Dover to Deal MCZ	Noted, no further response required.
The ES should consider including information on the impacts of this development on MCZ interest features, to inform the assessment of impacts on habitats and species of principle importance for this location. Further information on MCZs is available via the following link: http://publications.naturalengland.org.uk/category/1723382	Noted, no further response required.

Natural England Comment	National Grid's Response
Further information on the special interest features, the conservation objectives, and relevant conservation advice packages for designated sites is available on our website https://designatedsites.naturalengland.org.uk/	Noted, no further response required.
Regionally and Locally Important Sites	
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The ES should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of 11 any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.	Noted, no further response required.
Locally Important Sites within the Suffolk Study Area: • Westleton Heath NNR • Orfordness Havergate NNR • Registered Common Land – Aldringham Common • Registered Common Land – Knodishall Common • North Warren RSPB Reserve • Minsmere RSPB Reserve • The Haven, Aldeburgh LNR • Grove Wood Ancient Woodland • Great Wood Ancient Woodland	Noted, no further response required.
Locally Important Sites within the Kent Study Area: • Sandwich and Pegwell Bay NNR • Princes Beachland LNR • Ash Level and South Richborough Pasture Local Wildlife Site	Noted, no further response required.
Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)	
The ES should assess the impact of all phases of the proposal on protected species (including, for example, pinnipeds (seals), cetaceans (including dolphins, porpoises whales), fish (including seahorses, sharks and skates), marine turtles, birds, marine invertebrates, bats, etc.). Information on the relevant legislation protecting these species can be reviewed on the following link https://www.gov.uk/government/publications/protected-marine-species. Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, NBN Atlas, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.	A full assessment of marine mammals is presented in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.	Noted, no further response required.
In order to provide this information, there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. For Land Based Impacts Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.	Noted - Natural England has been kept appraised of the survey programme
Habitats and Species of Principal Importance	
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here	Noted, no further response required.

Natural England Comment	National Grid's Response
https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regardto-conserving-biodiversity.	
Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England 12 therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.	Noted, no further response required.
For Developments with a Land based element	
Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of: • Any historical data for the site affected by the proposal (e.g. from previous surveys); • Additional surveys carried out as part of this proposal; • The habitats and species present; • The status of these habitats and species (e.g. whether priority species or habitat); • The direct and indirect effects of the development upon those habitats and species; • Full details of any mitigation or compensation that might be required.	Noted - the survey scope has been agreed with Natural England. Detailed botanical survey has been undertaken where appropriate (e.g. rare arable plants survey in Suffolk). Ornithological and invertebrate surveys have been undertaken in relevant habitat at suitable times of year.
The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.	Noted - the project is seeking to achieve 10% BNG in each of Suffolk and Kent
The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.	Noted - records centres have been consulted
Contacts for Local Records	
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).	Noted - records centres have been consulted
Nationally Designated Landscapes	
As the development site is within Suffolk Coasts and Heath AONB and the Suffolk Heritage Coast, consideration should be given to the direct and indirect effects upon these designated landscapes and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for Suffolk Coasts and Heath AONB and Suffolk Heritage Coast.	Consideration has been given to the potential direct and indirect effects and purpose of designation of the Coast and Heaths AONB and Suffolk Heritage Coast within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The relevant sections of the AONB Management Plan are also considered.
Natural England's priority in providing landscape advice is to uphold the statutory purpose of Nationally Designated Landscapes, which is to conserve and enhance the area's natural beauty. We provide this advice as the national landscape agency for England and the designating authority for the SCHAONB. We believe that the advice presented within this response is commensurate with the national designation status, importance, and sensitivity of the AONB, and the need to uphold its statutory purpose.	Noted, no further response required.
Landscape/Seascape and visual impacts	
Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.	The Landscape and Visual Impact Assessment uses published landscape character information to inform the landscape baseline, which is based on the Suffolk Coastal Landscape Character Assessment (see **Application Document 6.3.2.1.B Appendix 2.1.B**

Natural England Comment	National Grid's Response
	Landscape Baseline). This has been supplemented with additional information gathered during field work.
The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape/seascape assessment methodologies. We encourage the use of Landscape and Seascape Character Assessment (LCA/SCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA/SCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.	The Landscape and Visual Impact Assessment uses published seascape character information to inform the landscape baseline, including the Suffolk Coastal Landscape Character Assessment (see **Application Document 6.3.2.1.B Appendix 2.1.B Landscape Baseline**). Published assessments are also used to develop embedded mitigation in terms of enhancement and responding to key characteristics.
Natural England supports the publication Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.	Noted, no further response required.
In order to foster high quality development that respects, maintains, or enhances, local landscape / seascape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.	The siting and design of the Suffolk Onshore Scheme has taken the local landscape and seascape character into consideration. The design of the Suffolk Onshore Scheme has been informed by landscape and visual considerations, other environmental and technical desk studies and site surveys as well as consultation and stakeholder feedback. The design of the Saxmundham Converter Station, in terms of the building form and the cladding materials, has been developed alongside consultation and stakeholder feedback and design principles should be referred to at **Application Document 7.12.1 Design Principles – Suffolk.**
The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects, this includes those other developments which are at the scoping stage. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape / Seascape Character Assessment at a local level are also available on the same page. https://www.gov.uk/government/publications/seascape-assessments-for-north-east-north-westsouth-east-south-west-marine-plan-areas-mmo1134 https://data.gov.uk/dataset/3fed3362-2279-4645-8aaf-c6b431c94485/mmo1037-marine-characterarea	The Landscape and Visual Impact Assessment refers to the relevant published landscape and seascape character assessments to inform the landscape baseline (see **Application Document 6.3.2.1.B Appendix 2.1.B Landscape Baseline**).
Access and Recreation	
Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green/blue infrastructure. Relevant aspects of local authority green/blue infrastructure strategies should be incorporated where appropriate.	The indicative landscape strategy presented on **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation** demonstrates the potential green/blue infrastructure connections and connectivity. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** set out measures to

Natural England Comment	National Grid's Response
	manage Public Rights of Way through the construction and operational phases of the Proposed Project.
England Coast Path	
The England Coast Path (ECP) is a new National Trail that will extend around all of England's coast with an associated margin of land predominantly seawards of this, for the public to access and enjoy. Natural England takes great care in considering the interests of both landowners/occupiers and users of the England Coast Path, aiming to strike a fair balance when working to open a new stretch. We follow an approach set out in the approved Coastal Access Scheme and all proposals have to be approved by the Secretary of State. We would encourage any proposed development to include appropriate provision for the England Coast Path to maximise the benefits this can bring to the area. We suggest that the development includes provision for a walking or multi-user route, where practicable and safe. This should not be to the detriment of nature conservation, historic environment, landscape character or affect natural coastal change. Consideration for how best this could be achieved should be made within the Environmental Statement.	In **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation, and Tourism**, the baseline conditions reports existing PRoW network and recreational routes within the study area. The King Charles III England Coast Path (KCIIIECP) crosses the Kent Onshore Scheme Order Limits as it passes along Sandwich Road and is therefore identified as a sensitive receptor and appropriately considered within the Socio-economc, Recreation and Toursim assessment of effects. There will be no requirement to temporarily close/ divert the KCIIIECP during construction as a trenchless HVDC crossing will be implemented at depth below ground level. Impacts on KCIIIECP are assessed as negligible as it can continue to be used for its intended purpose without impacting the value of the route or quality of user experience. Similarly all impacts on KCIIIECP assessed within Application Document Part 3 Kent Chapter 7: Traffic and Transport are assessed as negligible. **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment** set out an assessment of visual effects for construction, operation and maintenance, including for users of the KCIIIECP. Management measures outlined in **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** will be applied during construction to all PRoW, including KCIIIECP, although as noted above no crossing points or diversions are expected during the construction phase for KCIIIECP.
As part of the development of the ECP a 'coastal margin' is being identified. The margin includes all land between the trail and the sea. It may also extend inland from the trail if: • it's a type of coastal land identified in the Countryside and Rights of Way Act 2000 (CROW Act), such as beach, dune or cliff • there are existing access rights under section 15 of the CROW Act • Natural England and the landowner agree to follow a clear physical feature landward of the trail 14 Maps for sections of the ECP and further proposals for adoption are available here: https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-thecoast	Noted, no further response required.
Rights of Way, Access land, Coastal access and National Trails	
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby Click here to enter text. National Trail. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	A complete assessment of socio-economic effects has been undertaken has be undertaken, including on Public Rights of Way and recreational routes. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism,** Section 9: Assessment of Impacts and Likely Significant Effects and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. Outline Public Rights of Way Management Plan have been developed for both Kent and Suffolk that set out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. Please refer to A**pplication Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** for further information.
Water Quality	
Increases in suspended sediment concentrations (SSC) during construction and operation (e.g. future dredging works) have the potential to smother sensitive habitats. The ES should include information on the sediment quality and potential for any effects on water quality through suspension of contaminated	Project specific sediment modelling has been undertaken for the Proposed Project and used in the ecology chapters for assessment. This includes **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology, Application Document 6.2.4.3 Part 4 Marine Chapter**

Natural England Comment	National Grid's Response
sediments. The EIA should also consider whether increased suspended sediment concentrations resulting are likely to impact upon the interest features and supporting habitats of the designated sites as listed above.	**3 Fish and Shellfish Ecology and Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology.**
The ES should consider whether there will be an increase in the pollution risk as a result of the construction or operation of the development.	The potential for the Proposed Project to increase pollution risks to the water environment has been assessed and a suite of measures secured to reduce the risks of pollution are secured by the DCO.
For activities in the marine environment up to 1 nautical mile out at sea, a Water Framework Directive (WFD) assessment is required as part of any application. The ES should draw upon and report on the WFD assessment considering the impact the proposed activity may have on the immediate water body and any linked water bodies. Further guidance on WFD assessments is available here: https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-andcoastal-waters	Application Document 6.9 Water Framework Directive Assessment has been prepared, which has considered the marine environment up to 1 nautical mile. The findings of the assessment, which has been undertaken in close consultation with the EA, have been used to inform the ES.
Air Quality	
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.	A detailed air quality assessment has been undertaken at ES stage to determine the impact on human and ecological receptors from construction vehicle emissions. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.**
Climate Change Adaptation	
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.	Noted, no further response required.
Contribution to local environmental initiatives and priorities	
Due to the lack of detail available at this stage, Natural England is unable to provide any information on how this development first with local initiatives and priorities such as the delivery of green/blue infrastructure, biodiversity opportunity areas or biodiversity enhancements.	Noted, no further response required.
Cumulative and in-combination effects	
A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.	Noted, **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** describes the aspects of the Proposed Project through the construction and operational phase, the technical assessments contained within the environmental statement have used the description in this chapter as the parameters for the assessments. It should also be noted that effects between the Proposed Project and other proposed developments in the area are considered within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects,**

Natural England Comment	National Grid's Response
	Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information): a. existing completed projects; b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.	Noted, A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from the Proposed Project due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies**. The inter-project assessments can be found within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** In relation to point 'a', some operational projects have been considered due to their ongoing operational and maintenance requirements identified within their respective EIAs. These can be found in Table 11.2 within **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** In relation to other fully operational projects where little to no operation and maintenance activities are expected, these have been considered as part of the baseline conditions reported within the technical environmental topic chapters.
Natural England's advice on the scope and content of the Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/ Please refer to best practice advice for Cumulative Impact Assessments: Parker et al. (2022c). Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. Natural England. Version 1.2, 140pp	National Infrastructure Planning Advice Notes have been utilised as part of the assessment and reference to these where applicable has been made within the Environmental Statement in Part 2, 3 & 4 of the technical specialist assessments. Thank you for the additional Parker et al. (2022c) guidance resource. We have reviewed this and taken the guidance into consideration where required. However, for a consistent approach across all schemes, we have followed the guidance from the planning inspectorate provided in AN17. Therefore, the tier system provided in Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment has been adopted in the inter-project cumulative effects assessment. Please find below examples of where the Parker et al. (2022c) guidance has been considered within the Environmental Statement: A short list of plans and projects has been presented in **Application Document 6.3.1.5.C Appendix 1.5.C Inter-Project Cumulative Effects Short List**. Publicly available information has been used for descriptions of the shortlisted projects in **Application Document 6.3.4.11.A Appendix 4.11.A Descriptions of Other Projects.** The number of mammals in the study area has been addressed within **Application Document 6.2.4.4 ES Part 4, Chapter 4: Marine Mammals.**

Appendix B - Detailed Comments – 1.3 Main Alternatives Considered

Natural England Comment	National Grid's Response
Shortest route possible to minimise cable length How has this been assessed, has equal weighting been applied to assess cost vs environment?	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Avoidance of environmentally sensitive areas, where possible Has mitigation hierarchy been applied here? Natural England's advice is to use the avoid, reduce, mitigate hierarchy to reduce environmental impacts	A robust alternatives assessment has been undertaken for the Proposed Project. From an environment perspective, avoiding environmentally sensitive areas and application of the mitigation hierarchy were key considerations. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Limiting need to cross What will be the impact of cable crossings? Has this been quantified so proposed external protection for crossings been included as part of the assessment?	Yes, proposed crossings have been included within the technical assessments presented within in each ES chapter as required. Further details of the proposed crossings can be found within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Potential for converters for the proposed Nautilus and Euro Link schemes to be co-located with the Sea Link facility A robust assessment of the LVIA impacts of these projects to the AONB should be clearly presented in the PEIR both alone and in combination.	The Proposed Project is coordinating with other large scale infrastructure projects where practicable, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.** Please refer to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and Application Document Part 3 Kent Chapter 1 Landscape and Visual for the complete assessment on National Landscapes (AONB's). The consideration of the cumulative impact on National Landscapes are covered within the inter-project cumulative assessments referenced above.
Appendix B - Detailed Comments – 1.4 EIA Approach and Method	
Installation of cable ducts (12 ducts considered within EIA)	The approach to co-locating infrastructure with other proposed interconnectors in the area has changed since the EIA Scoping Report. The Proposed Project is coordinating with other large

Natural England Comment	National Grid's Response
Support the coordinated options for cable installations to minimise environmental impacts as long as the overall environmental outcome is better.	scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with the LionLink and Nautilus projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.**
Up to four cables, with maximum of two trenches Has the worst-case scenario been considered throughout the document? Until a definitive decision has been made with regards to the number of cables and crossings, the maximum area of impact needs to be assessed in the ES. Natural England would like to see the worst-case scenario for each activity, and associated impacts, provided and assessed for the construction, operation and decommissioning stages. Furthermore, we advise that the number/length of cables per project should be minimised through project design in order to minimise the overall area of impact. In this project, the footprint of impact is significantly greater if two trenches are required for this project.	The various assessments within the Environmental Statement (ES) consider the realistic worst-case scenario throughout. **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** describes the aspects of the Proposed Project through each stage of development and outlines the parameters which have been considered in the topic assessments reported in the ES. **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** explains the Rochdale Envelope Approach which has been adopted, allowing a realistic worst-case assessment to be undertaken. The environmental assessments have considered the parameters defined within the limits of deviation which represent a realistic worst case scenario. The lateral Limits of Deviation (LoD) for Suffolk are illustrated on **Application Document 2.5.1 Work Plans - Suffolk**, the lateral LoD for Kent are illustrated on **Application Document 2.5.2 Works Plans - Kent** and for the Offshore Scheme on **Application Document 2.5.3 Work Plans - Offshore**. For information relating to the vertical LoD for the different aspects of the Proposed Project please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which describes these and sign posts to the relevant design drawings. The Flexibility Assumptions are also set out in each technical assessment chapter within Section 1.4 Basis of Assessment for each element of the Proposed Project.
Transition Joint Bays (TJBs) will be located as close to the coast as possible. There are a number of protected areas, sensitive habitats and features near the landfall locations (e.g. saltmarsh at Pegwell Bay) which could be affected by the TJB siting. Natural England's advice when selecting a cable route, is to use the avoid, reduce, mitigate hierarchy to reduce environmental impacts. Therefore, it is important that TJB siting avoids protected areas, sensitive habitats or features, if possible	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**. Protected areas and sensitive habitat have been considered in the siting of the Transition Joint Bays (TJBs) and the design of the Proposed Project, including the proposed cable routes in Kent and Suffolk. The mitigation hierarchy has been followed.
Access to the landfall installation site could be gained terrestrially. This could lead to direct impacts to the beach due to construction vehicle traffic or to the hydrodynamic and sediment transport regimes due to	Paragraph 1.4.3.48 of the EIA Scoping Report was describing a potential trenched installation method for the cable landfall. As set out in **Application Document 6.2.1.4 Part 1**

Natural England Comment	National Grid's Response
the presence of access ramps. We would advise that beach access impacts should be scoped in and assessed.	**Introduction Chapter 4 Description of the Proposed Project** the cable landfall would be installed using a trenchless method.
Up to 4 open cut trenches could be excavated through the intertidal zone. This could lead to direct impacts on sensitive coastal and intertidal habitats and features. We advise that cable installation techniques that minimise sediment disturbance and the need for cable protection measures inshore are preferable, in order to avoid direct impacts on sensitive coastal and intertidal habitats and features. These impacts should be scoped in and assessed.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. This, alongside detail on the installation methodologies at both landfalls are presented in detail within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** Open cut trenching has been removed from the Project Description as a proposed option.
If temporary work structures are required within shallow nearshore waters, such as cofferdams, sheet piling or floatation pits, their presence could cause morphological change through modification of the nearshore hydrodynamic regime or diversion of sediment transport pathways Potential impacts due to the presence of temporary work structures within shallow nearshore waters should be scoped in and adequately assessed.	Temporary work structures have been scoped into our assessment for marine topics as required and assessed in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
Horizontal Directional Drilling (HDD) Horizontal Directional Drilling (HDD) is a strongly preferred method for installation of the cable through the intertidal zone, as it eliminates physical disturbance of the intertidal area. Natural England welcomes this approach and we support the undertaking of feasibility studies and ground investigations in a timely way to inform the methodology and environmental assessments. However, Natural England is aware that the use of HDD relies heavily on local site and environmental conditions and so cannot be guaranteed. We recommended that an alternative methodology is identified in advance and is suitably assessed for environmental impacts, to minimise disruption and environmental risks should HDD become unfeasible at short notice. Additionally, the risk of potential contamination of notified habitats, from the use of chemicals for lubrication of the HDD 18drill, will need to be considered in the ES and HRA.	The Proposed Project is committed to the use of trenchless techniques at both landfalls. This, alongside detail on the installation methodologies at both landfalls are presented in detail within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Whilst we recognise that a decision has not yet been confirmed regarding the chosen cable installation technique at landfall, consideration should be given to the extent of sensitive areas of seabed/substratum that could potentially be disturbed during cable installation at landfall. We advise that in order to reduce environmental impacts, careful consideration should be given to the cable burial technique so as to reduce sediment plumes or to avoid sensitive areas. A realistic worst case scenario should be detailed and the impacts assessed.	The Proposed Development is committed to the use of trenchless techniques at both landfalls. This, alongside detail on the installation methodologies at both landfalls are presented in detail within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
If Horizontal Directional Drilling (HDD) is used at either landfall, associated activities may have direct or indirect impacts on the nearshore hydrodynamics and morphology. We advise that consideration needs to be given to the whole HDD compound and extension of activities. This includes access routes from the intertidal up to the exit pits, and also impacts arising from the placement of infrastructure and machinery movements. The works and their potential impacts should be considered scoped in.	Impacts to coastal morphology and hydrodynamics from HDD activities is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
No information has been provided regarding the anticipated locations or total area of impact (both direct and indirect) for prelay grapnel run, boulder clearance, or other route clearance activities. We advise that the total area of impact (both direct and indirect) should be provided for cable route clearance activities. For boulder clearance in protected sites, this should also include where the boulders	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** outlines all the proposed offshore route clearance methods considered with the total area of impact from these activities assessed in Volume 6, Part 4 Marine.

Natural England Comment	National Grid's Response
are placed and where they have been removed from. Specific locations should also be provided for these activities and any sensitive habitats identified. We also advise that the avoid, reduce, mitigate hierarchy should be used to reduce environmental impacts. These potential impacts should be considered scoped in and assessed.	
No information has been provided regarding the anticipated locations or total area of impact for pre-sweeping. We advise that the total area of impact (both direct and indirect) should be provided for presweeping. Specific locations should also be provided for these activities and any sensitive habitats identified and scoped into the assessment. If pre-sweeping is required, it will be necessary to consider the nature of the material and any disposal requirements. We also advise that the avoid, reduce, mitigate hierarchy should be used to reduce environmental impacts	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** outlines the areas of Pre-sweeping along the offshore route between KP96.32 to KP113.883
Cable crossing locations have not been identified at this stage. However, in order to assess the environmental impact of any cable crossings, it will be necessary to provide specific locations (including a map), the total area of impact, and any habitats impacted. We advise that specific locations of any cable crossings should be provided, when known, along with the total area of impact, any sensitive habitats affected, and the total volume of external cable protection. Again, we advise that the avoid, reduce, mitigate hierarchy should be used to reduce environmental impacts, however, should this not be possible we advise methods which allow decommissioning at the end of the project if e preferred and any reduction to volume/area of impact can be applied. We advise detailed commentary is provided in the ES on the introduction of hard substrate as part of the proposed developments to allow further understanding of the potential nature conservation impact. This would include: • location of deposit sites; • type / size / grade of rock / mattresses / bags to be used; • tonnage / volume to be used; • contingency tonnage / volume to be used; • method of delivery to the seabed; • footprint of hard substrate introduced; • assessment of the impact • Decommissioning potential of any introduced substrate Where protective material cannot be avoided we recommend using a targeted placement method, for example use of a fall pipe vessel rather than using vessel-side discharge methods.	Details relating to the proposed marine cable crossings are provided within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** There are ten marine in-service power and fibre optic crossings required. **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** also contains the onshore crossing locations for Nemo Link and Thanet which would be crossed by passing under the existing asset via trenchless solution such as HDD along with other onshore utilities. In addition to the above in-service power and fibre optic cables, **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** also lists the nine known developments also likely to cross the Offshore Scheme but at this stage, specific locations are unknown. Details relating to the terrestrial crossings are also provided within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and presented within **Application Document 6.4.1.4 Crossing Schedules.** **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** includes a commitment that crossing and / or proximity agreements will be agreed with aggregate extraction, cable and pipeline owners. The Crossing agreement describes the rights and responsibilities of the parties and also the design of the crossing. Crossing design will be in line with industry standards, using procedures and techniques agreed with the cable and pipeline owners. This is secured via Requirement 6 of Schedule 3 in the draft DCO. **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** also includes information regarding the back fill and remedial rock protection that will be employed for the Offshore Scheme. This information has been used to inform the environmental assessments contained within Volume 6, Environmental Statement (Part 4) marine chapters.
It is stated that 'periodic surveys would be undertaken to assess the protection levels afforded the cable, particularly in areas of mobile seabed." Assessing seabed mobility would help inform the likelihood of successful cable burial over the lifetime of the project. We would advise that seabed mobility should be scoped in and assessed as part of the Physical Environment impact assessment.	Seabed morphology, including seabed features such as bedforms and sandbanks have been assessed within **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**

Natural England Comment	National Grid's Response
It is stated that when a cable fault occurs, the location of the fault will be identified, and the faulty section replaced. Remedial cable burial is also mentioned. However, there is no mention of other remedial and maintenance activities that could cause additional environmental impacts during the lifetime of the cable, such as maintenance of external cable protection or new external cable protection. The full range of cable repair/replacement/remedial burial works and external cable protection addition and maintenance should be scoped in, considered and their impacts assessed.	Noted, maintenance activities associated with the different aspects of the Proposed Project, including details of repairs which may be required are detailed within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The details included within this chapter have been factored and included into the technical environmental assessments contained within the ES.
Whilst decommissioning is discussed, there is no mention of the fate of any cable protection already laid, nor of the need to lay additional cable protection during decommissioning. Any disturbance to habitats and features should also be recognised and assessed upfront We advise that a full assessment of potential impacts to the marine environment of the decommissioning of the proposed project should be provided. Our primary concern is that impacts are minimised. Furthermore, decommissioning should also consider permanent habitat loss from any infrastructure that remains at the time of decommissioning (an extension of habitat loss from the operational phase).	Noted, further information regarding the decommissioning phase is now included within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** Impacts relating to the decommissioning phase of the Proposed Project have been factored and included into the technical environmental assessments contained within the ES.
If the project is required to be decommissioned, the proposed underground cables would be decommissioned. Dependent on specific requirements the redundant cables could either be left in-situ, or all or parts of the cable could be removed for recycling. Where this is not possible, removed cables would be disposed of in accordance with the relevant waste disposal regulations at the time of decommissioning. We would advise from a landscape perspective (subject to any other environmental requirements) that if the materials which form the cables are entirely inert or pose minimal risk to any environmental asset they should be left in situ. This would be preferable to major works to excavate the route in whole or in part to extract them.	Noted, further information regarding the decommissioning phase is now included within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and considered in all relevant chapters.
Appendix B - Detailed Comments – 1.5 EIA Approach and Method	
The project's development phases i.e. construction/operation/decommissioning have not been considered. Phase of the development should be considered.	Details of the Proposed Development phases are now included within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** where each phase of the Proposed Project is discussed in turn.
Natural England and JNCC have written useful guidance on tiers for scoping projects into cumulative/in-combination assessments. Please see Parker et al. (2022c). Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. Natural England. Version 1.2, 140pp, while this document is intended to be guidance for the development of offshore wind farms, the sections related to cable installation in the marine environment are of relevance to this application.	Thank you for the additional Parker et al. (2022c) guidance resource. This guidance has been reviewed and taken the guidance into consideration where required. However, for a consistent approach across all schemes, we have followed the guidance from the planning inspectorate provided in AN17. Therefore, the tier system provided in AN17 has been adopted in the inter-project cumulative effects assessment.
Sensitivity Criteria allocates 'Very High' to 'Very high importance and rarity, valued at an international level and limited potential for recovery or substitution' and 'High' to 'High importance and rarity, valued at a national level and limited potential for recovery or substitution' Natural England question the assertion that only designated sites of international importance can attain a sensitivity rating of Very High. We therefore seek assurance that SCHAONB, as a nationally designated area, is accorded the highest rating by the LVIA.	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. The sensitivity of the AONB is considered to be Very High.

Natural England Comment	National Grid's Response
General	
There is no reference to other environmental assessments, HRA and MCZ Assessments. Natural England would expect to see some consideration as to the information required for HRAs and MCZ Assessments. Please refer to Advice on Operations in our Conservation Advice packages Designated Sites View (naturalengland.org.uk). Sufficient survey programmes must be planned to support the application process and understanding what the requirements are for later processes, such as in the HRA, will provide greater understanding of these survey requirements. Developers are required to provide sufficient evidence and supporting information for the regulator to assess impact to Marine Protected Areas. Developers can provide this in a 'shadow' assessment or as a section within their Environmental Assessment.	Please see **Application Document 6.6 Habitat Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone Assessment** of the ES.
Appendix B - Detailed Comments – 2.1 Evolution of the Suffolk Onshore Scheme	
Landfall at Sizewell and using the existing substation at Sizewell appears to be the only option which could avoid the footprint of any protected site and therefore is likely to be least damaging to protected sites on the Suffolk Coast. However, this is subject to confirmation, with substantial further information on project design required to fully understand the implications. Furthermore, one option would require re-routeing through Sizewell Marshes SSSI which should be avoided. Using the corridor allocated to the existing 132kV connection which would therefore be of preference. This option would potentially still be less damaging than other route options due to the avoidance of a larger number of protected sites. However, both site option areas A and B for the converter station are located within Suffolk Coast and Heaths AONB and are within land that is part of ecological mitigation area for Sizewell C Nuclear Power Station. If connection options in the Sizewell area are chosen in-combination impacts with Sizewell C Nuclear Power Station would need to be considered if this option is taken forward. All cable corridors are within The Suffolk Coasts and Heaths AONB (SCHAONB). Our comments related SCHAONB refer to Chapter 2.1 and 2.2 of the Suffolk Onshore Scheme and are detailed above in the table. The Hundred River flows through the Suffolk Scoping Boundary. The landfall at Leiston-Aldeburgh SSSI lies with all Emerging Preference and Alternative boundaries and are highly likely to result in loss or damage to the SSSI interest features. With all options there is the potential for significant effects on designated sites and the features for which sites are designated for. Refinement of route, sub-station and converter station options. Natural England advises that the Applicant will need to avoid protected sites in the first instance. Only once all options for avoidance have been exhausted, should the applicant follow the subsequent steps of the mitigation hierarchy. For Natural England to provide accurate and comprehensive advice on the potential for significant effects on protected sites, we require detailed information on project design, including construction techniques and timing of construction. We request further detailed engagement on corridor route and siting of infrastructure access to the above information, prior to a decision being made on the route to be taken forward. Habitat recoverability would be a concern where sensitive protected and important habitats such as wet grasslands, salt marsh, heathland are present. Disturbance and potential for recoverability of habitats must be fully assessed. Impacts upon the habitats and the species which depend on those habitats must be fully considered	Noted, since the EIA Scoping Report was submitted the design of the Proposed Project has evolved and been refined. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which outlines the latest design and represents the Proposed Project as assessed within the ES. For details relating to the design evolution and alternatives considered please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**.

Natural England Comment	National Grid's Response
With regards to the Applicant's preference for High Voltage Alternating Current (HVAC), this option would potentially be less damaging based on the reduced length of the working corridor which would be 40m width instead of the 80m as for HVAC.	The number of cables and working width varies depending on whether the underground cable is HVAC or HVDC. However, note that the sequence and method of construction and installation is the same. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which outlines the latest design and provides specific details relating to the working widths required for cable installation .
The Sea Link and Euro Link projects appear to be working on similar briefs, in terms of onshore cable development in Suffolk for the National Grid network, and both have considered a number of landfall options along the Suffolk coast, including Sizewell and land between Aldeburgh and Thorpeness. They also include other options beyond that at Southwold, Walberswick, Minsmere, north of Sizewell, South of Aldeburgh. It seems sensible to consider linking these landfall options and infrastructure to minimise the impacts on the coast within Sites of Special Scientific Interest (SSSIs), the overlapping international conservation designations, and the Area of Outstanding Natural Beauty (AONB) and Heritage Coast, and other identified areas of importance such as ancient woodlands.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with the LionLink and Nautilus projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
The two favoured Sea Link landfall locations are at the Sizewell Gap and between Aldeburgh and Thorpeness. Both have SSSI and SPA sites in close proximity, as did the other three landfall option areas of search. The proposals are for a new underground HVDC cable between the landfall and the new converter station. There would then be an underground HVAC between the new converter station and the new Friston substation. At both Sizewell and Thorpeness there may be potential for saline intrusion through the cable routes, structures and processes that could impact on the freshwater, and/or brackish habitats behind the barrier beach or coast which should be investigated further.	The Environmental Statement is supported by groundwater risk assessments that identify potential impacts on groundwater receptors including from potential dewatering and saline intrusion. As reported in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology**, a saline intrusion assessment has been undertaken as part of Application Document 6.3.2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment which assesses the potential risk of saline intrusion at the landfall location in Suffolk. The assessment concluded that there is a low risk of significant additional (to current natural processes) saline intrusion as a result of the Proposed Project.
Issues relating to the burying of cables relate to the working widths, which appear to be at least 40 m running up to 100m. There may also be issues relating to the easements, which may be 25m, if these are required across the grazing marshes and other habitats depending on what management is required for the electricity infrastructure.	Installation of the proposed HVAC and HVDC cables would typically be undertaken within an 63 m and 40 m wide working width respectively, whilst a combined HVDC and HVAC corridor would typically be undertaken within an 78 m wide working width. Further details on working widths and cable easements are provided within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The construction corridor will be narrowed in certain locations to minimise impact on environmentally sensitive sites as committed to in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**. Details of the proposed maintenance associated with the underground HVAC and HVDC cables is provided within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. In general, maintenance activity along the proposed cable routes would be limited to non-intrusive inspections and cable repairs. The latter would only be required in the unlikely event of a cable fault. Where a fault does occur the location of the fault would be identified, and the faulty section of cable replaced. The activities involved in cable repair would be similar to those outlined for installation albeit over a much smaller area and scale.
The proposals shown include an option with a new substation at the Sizewell Nuclear Power Stations site and a new National Grid overhead line 400kV.	This option has not been taken forward. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,**

Natural England Comment	National Grid's Response
This line would cross and potentially require new towers within Sizewell Marshes SSSI and Leiston-Aldeburgh SSSI.	**Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Suffolk landfall fall is within Suffolk Coasts and Heaths AONB NE has concerns regarding the landfall of SeaLink within the SCHAONB. We appreciate that the AONB extends along the entirety of the coast within the area of search, however we recommend that advice is sought on creating a route that is the least impactful either alone or in combination with other plans and projects and/or if possible avoids the AONB. If not able to avoid the AONB then full justification for why alternatives have been rejected should be included in any assessment. We welcome the opportunity to be part of such discussions.	The assessment of effects on the AONB is contained within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and summarised in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** which makes reference to the statutory purpose and functionality. The mitigation hierarchy has been applied to mitigate effects where possible. The assessment focuses on each of the published natural beauty indicators and special qualities of the AONB relevant to landscape and visual matters. The **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** provides information regarding reinstatement. A robust alternatives assessment has been undertaken for the Proposed Project which considered the presence of the AONB. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Preferred substation location is the Friston substation We welcome the decision to use the proposed Friston substation rather than extend the existing Sizewell B or planned Sizewell C substations, given that the latter two are within the AONB.	Noted, no further response required.
Potential converter site option 1, within option area E, is in the immediate setting of the AONB. A converter station is a substantial building with the structures for this scheme anticipated to have a footprint of up to 10ha and valve halls up to 30 meters high. Based on the information provided (and subject to environmental constraints), it is Natural England's preference that the converter site option 3, outside of the AONB be selected. We recommend that a robust Landscape and Visual Impact Assessment is required to fully assess the potential effects of converter sites withing the AONB.	Site 3 (shown on Figure 2.1.3 in the EIA Scoping Report Volume 3 Figures) has been selected over Site 1 following further review of the design since the submission of the EIA Scoping Report. A robust alternatives assessment has been undertaken for the Proposed Project. For further information see **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** which contain further details on the main alternatives considered for the Proposed Project. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.

Natural England Comment	National Grid's Response
	A robust Landscape and Visual Impact Assessment has been undertaken as part of the EIA and is reported on within the ES. The assessment of effects on the AONB is contained within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and summarised in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
Converter site option areas and potential coordinated converter site areas We would welcome clarity about the difference between converter site option areas (A-H) and the potential coordinated converter site areas (1-7)	Noted, since the EIA Scoping Report was submitted the design of the Proposed Project has evolved and been refined. Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which outlines the latest design and represents the Proposed Project as assessed within the environmental statement. For details relating to the design evolution and alternatives considered please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**.
Appendix B - Detailed Comments – 2.2 Landscape and Visual	
All the relevant national policies appear to have been identified along with the relevant sources of information required to provide a baseline for the LVIA. We would like to emphasise the role of the statutory duty (section 85 of the Countryside and Rights of Way Act 2000) to 'have regard' to the statutory purpose of the AONB in both complementing national planning policy and regarding the 'setting' of the designated area. NPS EN-1 makes clear reference to the duty in relation to settings.	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** This includes reference to the setting of the AONB.
The National Planning Policy Framework states: Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 176), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character. The impact of this scheme on the Suffolk Heritage Coast will need to be assessed.	The assessment of effects on the Suffolk Heritage Coast is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The sensitivity of the AONB is considered to be Very High.
The general approach (the methodology) proposed for the LVIA. The scope of the assessment is focused very much on assessing the landscape and visual effects of the converter sites, whereas the scheme also involves major construction works (underground cabling) within a nationally designated landscape. The effect of a 40m wide construction corridor, potentially a temporary effect, should not be underestimated. This construction may well coincide with commencement works for Sizewell C and potentially the onshore cabling works for East Anglia 2 and 1 North Offshore Wind Farms. The combined scale of these works would present large construction areas within this part of SCHAONB. Natural England would welcome a full assessment of how the scheme would affect the delivery of SCHAONB's statutory purpose.	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**. The LVIA considers all elements of the Suffolk Onshore Scheme, which are set out within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** An assessment of cumulative effects is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Landscape and Visual impacts are proposed to be limited to an assessment of the cable route to just the construction phase. This assumes that reinstatement of the route would result in no significant effects for the operational phase. Natural England advise that the success of reinstatement cannot be guaranteed. We recommend that all installation options are thoroughly assessed and presented, along with supporting survey results and predicted recovery/reinstatement times in the Preliminary Environmental Impact Report.	The Scoping Report states that the "LVIA of the landfall and underground cable corridors will be focused on the construction phase as operational effects are not considered to be significant". This is based on past experience with similar HVDC projects (accepted by decision makers) and professional judgement, as the landscape would be fully reinstated. The Landscape and Visual Impact Assessment includes an assessment of effects at all project stages for all elements of the Suffolk Onshore Scheme, included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** Further details regarding

Natural England Comment	National Grid's Response
	reinstatement should be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk.**
Appendix B - Detailed Comments – 2.3 Ecology and Biodiversity	
We welcome Biodiversity Net Gain.	Noted, no further response required.
It is not clear why the Applicant has chosen an area of 10km for the desk-based study area for designated sites. The search area for designated sites should be based on the potential for impact pathways to protected sites e.g. impacts on potential functionally linked land, hydrology, air quality etc. The Impact Risk Zone (IRZ) for designated sites, as available on Magic, provides a useful starting point, however, professional judgement using the best available evidence will be required to determine potential impact pathways and therefore the protected sites which should be further considered.	10 km is a standard initial search area since many impacts on internationally important wildlife sites will not extend beyond 10 km, particularly from this sort of development. However, sites further than 10 km away are included if there is an impact pathway. For further information please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity.**
It is unclear what area of search the Applicant is using to carry out bird surveys. Survey area should be based on the potential for species to be present within the area and should consider functionally linked land. Natural England advises that it is the Applicant's responsibility to determine whether there is sufficient information/evidence to exclude areas from surveys. If it cannot be determined that areas are not functionally linked to protected sites designated for breeding, passage, or overwintering birds then surveys will likely be required.	Noted. Bird survey methodologies have been shared with Natural England during the scoping stage and Natural England have been kept appraised of the extent and results of our bird survey work including providing them with draft survey reports
We welcome two full seasons of non-breeding and breeding bird surveys but see comment above regarding survey area.	Noted, no further response required.
It is noted that the Extended Phase 1 Habitat Survey Invertebrate surveys will determine the need for specific invertebrate surveys. This is welcomed, though we would like to note that the following sites may require further invertebrate surveys: • Alde-Ore Estuary Ramsar and SSSI • Leiston-Aldeburgh SSSI • Sizewell Marshes SSSI Dependant invertebrate communities are also present within Sandlings SPA. Sandlings SPA supports dependent invertebrate communities which should also be considered, as well as specialist invertebrate surveys where required.	Due to a commitment to HDD and the depth of the HDD, none of the surface features of those listed sites will be directly affected by the Propose Project. However, invertebrate surveys have been undertaken of significant habitats (e.g. acid grassland and the River Fromus) which will be directly affected. There are no surface works proposed within Sandlings SPA nor is there a requirement to HDD within Sandlings SPA, therefore there is no need for invertebrate survey in this location.
There are options presented which could result in damage or loss of ancient woodland sites (identified by the ancient woodland inventory): • Within the southern corridor (Site 1 Emerging Preference) • Option Area D for the converter station - There is a small parcel of Ancient Woodland (Buckles Wood) located within the north of this option • Option E for the converter station - There is a small area of Ancient Woodland at Great Wood located on the eastern edge of the option area and Grove Wood Ancient Woodland is located adjacent to the northwest corner of the option area. Whilst the above sites have been identified by the ancient woodland inventory, please note that some	Noted, all impacts to ancient woodland and ancient or veteran trees are considered within the **Application Document 6.10 Arboricultural Impact Assessment.** Please note, 15 m Buffer Zones around both Ancient Woodland sites within Suffolk are shown on the Tree Constraints Plans and Tree Protection Plans. In addition the root protection areas for all veteran and ancient trees have been increased to 15 times the stem diameter (measured at 1.5 m) or 5 m from the edge of the tree canopy (whichever is greatest) as per standing advice from Natural England and the Forestry Commission.

Natural England Comment	National Grid's Response
ancient woodlands may not be recorded by the inventory but may still be ancient in origin. It should also be noted that some ancient woodland sites are also Country Wildlife Sites. Ancient woodlands are irreplaceable habitats and impacts should be avoided. The Zones of Influence (ZoI) for Ancient Woodland should be clearly stated within the ES and consideration should be given to any edge effects and air quality impacts. We refer the Applicant to Natural England's standing advice for ancient woodland and the management of buffers. Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) Natural England advises that ancient woodlands be considered in relation to mobile species and supporting habitats. Fragmentation and disruption to habitats should be considered and assessed.	As stated within the **Application Document 6.10 Arboricultural Impact Assessment** no ancient woodlands have been identified within or near to the order limits in Kent.
There appears to be reliance on using Horizontal Directional Drilling (HDD) methods to reduce impacts to protected sites, species and habitats. However, details provided are limited. No information has been provided on the construction methods or how far drilling will extend. HDD should be considered beneath important hedgerows and other important habitats such as rivers. A decision to use trenchless or trenched methods at landfall has not been confirmed. Whilst protected sites should be avoided, trenchless crossings beneath protected sites would be preferable, though there would also be concerns with this with regards to impacts. It is stated in Table 2.3.4 that cable installation within the intertidal zone of the Outer Thames Estuary, and coastal grazing marsh of Leiston-Aldeburgh SSSI is unlikely to be achievable through HDD alone and it is unlikely that a significant effect can be entirely avoided. It should be noted that the risk of a potential bentonite break-out where HDD is used beneath water courses, and for where geotechnical investigations are carried out, must be considered and fully assessed and mitigated for. Drilling beneath protected sites, including SSSI sites may impact upon the features for which sites are designated for. Potential hydrological impacts should be fully assessed. We would welcome the use of methods to reduce impacts to designated sites, which may include the use of HDD below protected sites and important ecological; features. A detailed specification of the HDD process should be included in the EIA. This should include, but not limited to, timing of works, length of HDD, location of entrance and exit points, where vehicle access would be required, what the risk factors for failure would be, whether HDD is achievable through protected sites and confirmation of where HDD or open cut methods will be employed. The EIA should assess potential impacts upon protected sites and species. A detailed specification of protocols to be put in place to prevent break outs or frack-outs from occurring, or minimise impacts if this does occur, should also be included. Detailed assessment of potential hydrological impacts on protected sites is required.	Further information has since been provided to Natural England regarding the feasibility of HDD, its depth and its duration and methods. In general, it has not proven appropriate to HDD under all ecological features because the HDD involves creating launch pits and often takes longer and requires a larger working area than other methods, so can cause more disruption than open trenching. For further information on the proposed HDD technique, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Proposed Project Description.** Further detail relating to the techniques employed to avoid frack-out are detailed within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity.**

Natural England Comment	National Grid's Response
The Haven, Aldeburgh is a Local Nature Reserve which could be affected by the scheme. It is owned by East Suffolk Council and managed by the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. If not already done so, we advise that East Suffolk Council should be consulted in relation to potential impacts on this site.	East Suffolk Council have been consulted regarding the project. The Haven will not be negatively affected. For further detail please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity.**
Natural England considers on the basis of the information provided the proposals could damage or destroy the interest features for which the following Sites of Special Scientific Interest (SSSIs) have been notified: • Leiston - Aldeburgh SSSI • Sizewell Marshes SSSI • Alde-Ore Estuary SSSI • Minsmere to Walberswick Heaths & Marshes SSSI • Sandlings Forest SSSI • Iken Wood SSSI • Blaxhall Heath SSSI • Gromford Meadow SSSI • Snape Warren SSSI Natural England considers, on the basis of the information provided, the proposals could have significant effects on the following National Nature Reserves (NNRs): • Westleton Heath NNR • Orfordness Havergate NNR Please note that often the assessment of effects under the Habitats Regulations will also cover the assessment of the impacts on SSSIs where the two types of site overlap. However, in this case there are some SSSI interest features which are not European site features and as such the SSSI notified interest features should also be considered through a SSSI Impact Assessment. The ES should include a full assessment of the direct and indirect effects of the development on the interest features of these sites and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects. Internationally designated site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216 or Site Search (naturalengland.org.uk)	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity, Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitat Regulations Assessment Report.**
The proposed work at Leiston-Aldeburgh SSSI has the potential to impact the following designated features: • Aggregations of breeding birds - Gadwall, Mareca strepera • Aggregations of non-breeding birds - Gadwall, Mareca strepera • Aggregations of non-breeding birds - Shoveler, Anas clypeata • Aggregations of non-breeding birds - White-fronted Goose, Anser albifrons albifrons • Assemblages of breeding birds - Lowland damp grasslands • Assemblages of breeding birds - Lowland open waters and their margins • H1 - Calluna vulgaris - Festuca ovina heath • Lowland ditch systems	Trenchless techniques, for example Horizontal Directional Drill (HDD) will avoid impacts on the SSSI habitats, hydrology and chemistry due to the depth of the drill which is sufficiently deep no impact on surface features will arise. Noise and visual disturbance impacts on the SSSI and Sandlings SPA are assessed within **Application Document 6.2.2.2 Part 2 Chapter 2 Ecology & Biodiversity** and impacts on the SPA are also assessed in **Application Document 6.6 Habitats Regulations**. This identifies that with standard fencing as mitigation, and seasonal controls on some works adjacent to the SPA during the summer, there will be no significant disturbance of the SPA or SSSI birds.

Natural England Comment	National Grid's Response
• Outstanding dragonfly assemblage • S4 - Phragmites australis swamp and reed-beds • SD1 - Rumex crispus - Glaucium flavum shingle community • U1 b, c, d, f - Festuca ovina - Agrostis capillaris - Rumex acetosella grassland • Variety of breeding bird species (70) • Vascular plant assemblage This site also overlaps with Sandlings SPA for nightjar (Caprimulgus europaeus) and woodlark (Lullula arborea) The proposals at Aldeburgh potentially affect units 14, 15, 16, 19, 20, 21. Unit 1 might be affected if new cables are required from the Sizewell option. Reference is made to Horizontal Directional Drilling from the landfall to the landward side of the SSSI, approximately 800m. However, the area to be drilled beneath is shown by Designated Sites View to have the following SSSI features that could be impacted by construction and management activities and if there were significant changes to ground water levels and chemistry	
Direct cabling has the potential to impact Crag Pit Aldeburgh SSSI Crag Pit Aldeburgh SSSI is designated for neogene sediments and has the potential to impacted if trenching is close to this site.	Noted. There will be no open trench cabling close to this SSSI
The proposed work adjacent to Sizewell Marshes SSSI has the potential to impact the following designated features: • Assemblages of breeding birds - Lowland damp grasslands • Invertebrate assemblage • Lowland ditch systems • M22 - Juncus subnodulosus - Cirsium palustre fen meadow • M23 - Juncus effusus/acutiflorus - Galium palustre rush pasture • Vascular plant assemblage The marshes at Sizewell are also considered as functionally supporting the marsh harrier (Circus aeruginosus) which is an interest feature of the Minsmere-Walberswick SPA The functionality of the protected sites should also be considered when assessing potential impacts, such as functionally supporting land for foraging	Noted. Due to distance and HDD methods for traversing the wetlands along the coast there is no expectation of impacts on these receptors. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** for further detail.
Construction works have the potential to impact upon a variety of breeding and non-breeding bird interest features of protected sites and therefore, the timings of works will need to be carefully considered to minimise or reduce potential significant effects. This must be fully assessed, and timing constraints considered for both breeding and non-breeding bird interest features.	Noted. This has been discussed with Natural England and is being taken into account in the programming for works regarding Sandlings SPA and presence of Schedule 1 birds in particular.
We welcome that bird surveys will include specific surveys for hobby, nightjar, woodlark and barn owl. We note in particular that woodlark and nightjar are interest features of Sandlings SPA. Species specific bird surveys to be carried out at protected sites where required. We advise that all bird interest features of designated sites should be considered. The applicant should also consider any effects	Noted. The bird surveys and their emerging data have been shared with Natural England and the implications have been discussed. This includes consideration of impacts of the scheme on functionally linked land and surveys for hobby, nightjar, woodlark and barn owl. Impacts on these features are assessed and mitigation measures included as necessary in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** of the ES and **Application Document 6.6 Habitats Regulations Assessment.**

Natural England Comment	National Grid's Response
on bird interest features which may utilising land functionally linked to European sites. Surveys on functionally linked land (outside of the site boundary) may be required.	
Emerging Preferences for landfall Site 1 and Site 3 are very likely to be of high value for reptile habitat, suitable habitats for water vole and otter, ancient woodland is present within both sites. Habitats should be fully surveyed, and impacts assessed if these options are chosen.	A full suite of protected species surveys has been undertaken within the scope shared with Natural England and the local authorities. The Suffolk landfall area has been surveyed for reptiles, invertebrates and birds. The Suffolk landfall lies beyond Leiston-Aldeburgh SSSI and contains no wetland features so no survey for water vole or otter is required. There is no ancient woodland at the Suffolk landfall. The surveys are document in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity.**
It is stated that the desk study returned no records for water vole within the search area. There are known populations of water vole and otter recorded at Sizewell Marshes SSSI and Leiston-Aldeburgh SSSI. Suffolk Wildlife Trust and the RSPB who manage land within the scoping area may hold records for water vole and otter. Consider contacting Suffolk Wildlife Trust and the RSPB for recent records for water vole and otter and where necessary further surveys for these species should be carried out. The wetland areas in both the SSSIs support populations of water voles and otters so there may be disturbance and consequent licencing issues. EDF are aware of both species being present on Sizewell Marshes as they were part of the Sizewell C discussions, and EDF are currently working to install artificial otter holts and mink rafts. Additionally, EDF have constructed compensatory open water and reedbed habitats at Aldhurst Farm, which lies in the search area landward of Sizewell Marshes.	Full water vole and otter surveys of watercourses being affected by the scheme have been undertaken. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity** for further details.
We welcome that refinement of the Suffolk Onshore Scheme will be informed by the results of ecology and biodiversity surveys to avoid or minimise impacts on ecological receptors. We note the large onshore scoping area and multiple location options and reserve the right to make future detailed comments once the onshore infrastructure has been confirmed.	Noted, no further response required.
We welcome the control and management measures.	Noted, no further response required.
We welcome that where temporary habitat removal is required, this will be re-instated as soon as practically possible.	Noted, no further response required.
Consideration of light pollution effects on sensitive ecological receptors have not been included. Natural England recommends consideration of light pollution effects on sensitive ecological receptors.	Light pollution has been considered in the assessment. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
Protected species licences. Please contact the Natural England Case Officer and the Licensing team as early in the process as possible regarding information required for a protected species Licence and the possibility of a Letter of No Impediment.	Surveys have now been completed and it is considered the only potential need for licenced works would apply to water voles in Kent and Suffolk. In both cases it is considered on review of the impacts and survey data that the works can be undertaken under a Class Licence (CL31) meaning no specific Natural England licence, and therefore no Letters of No Impediment, will be required.
Appendix B - Detailed Comments – 2.7 Agriculture and Soils	
Corridors extend through areas of Environmental Stewardship Agreements and Woodland Grant Schemes The Applicant should consult the Rural Payments Agency at the earliest opportunity to discuss the impacts to schemes. We advise that the draft order limits contain land parcels which form part of a live Agri-environment scheme which is currently delivering benefits for nature, including the management of priority habitats. Consideration must therefore be given to any permanent and/or temporary impacts from	National Grid will identify areas in ESA and WGS. A key aspect of value of these schemes to a landowner is financial, and so would be dealt with in compensation, which would need to cover payments lost, pay back required etc. As such, for A&S this would normally be dealt with by reference to compensation with direct effects on for example biodiversity would be dealt with by that topic

Natural England Comment	National Grid's Response
the proposals on the scheme and implications for the agreement holder in terms of any necessary relocation of options, derogations, pay back of grant funding, scheme penalties etc. Land within the study area is currently under Countryside Stewardship (CS) (Higher Tier) Agreements, plus areas south and east of Leiston are under Entry Level plus Higher Level Environmental Stewardship agreements and small areas within the study area are under Higher Level Environmental Stewardship, as well as Organic Entry Level, plus Higher Level Stewardship areas to the north Loss of this habitat may result in direct land take or damage to land under agreement. Any land removed from Agri-Environment schemes may result in repayment of subsidies dating back to year 1 of the scheme, and with additional penalties. Construction and operational activities that pose an impact to agreement land in terms of water resources and quality of habitat and species, loss and fragmentation and disturbance (noise, light and visual) should be considered. Timing and dates of work should be considered to ensure that habitats retained can be sufficiently maintained. Required mitigation should be included with the Code of Construction practise and secured in the DCO. It should also be noted that any compulsory land purchases which are subject to agri-environment schemes would also need to be repaid.	
Appendix B - Detailed Comments – 2.9 Air Quality	
Data sources do not include the Air Pollution Information Service (APIS). The APIS website (CEH, 2022) should be consulted to identify any habitats or features of these designated sites that are sensitive to nutrient nitrogen and acid deposition	APIS has been used as a source in the air quality modelling and the ecological impact assessment.
Appendix B - Detailed Comments – 2.11 Socio-economics, Recreation and Tourism	
It is noted there is the potential for permanent closure or diversions to Public Rights of Way (PRoW) and recreational use. Any diversions of recreational routes must not impact upon protected sites, species or habitats. The applicant should provide details on how significant impacts on PRoW will be avoided in the ES. The use of trenchless crossings for PRoW to be considered.	A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent** set out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. An assessment of PRoW diversions and closures is contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**. Trenchless crossings for PRoW will be implemented at landfall to minimise impacts on PRoW near the coast as well as the King Charles III England Coast Path. None of the Public Right of Way (PROW) diversions proposed as part of the Kent Onshore Scheme and Suffolk Onshore Scheme will impact protected sites or protected species compared to the original PROW routes. Therefore, this assessment is not further contained within the ES. For further details, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity.**
Appendix B - Detailed Comments – 2.13 Cumulative Effects	

Natural England Comment	National Grid's Response
The National Grid Euro Link project has been included in the cumulative impact table. We advise that discussion should be considered in terms of potential for projects to be carried out at similar times to reduce potential impacts. We advise the Applicant to consider communication with the EuroLink project where there is potential for infrastructure to be shared/works to be carried out at the same time. both projects, particularly with regard to in-combination impacts.	The Proposed Project is coordinating with other large scale infrastructure projects where practicable, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure where it is feasible. The assessment of inter-cumulative effects with these other proposed developments, including Lion Link (previously Euro Link) is considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
The Shoreline Management Plan 7 (SMP) covers the shoreline across the majority of Suffolk and all areas currently being considered for landfall. We advise that the applicant should consider the implications of SMP policy across the scope of the project. The Applicant should consider the appropriateness of the development in locations where managed realignment may be undertaken in the future.	The relevant SMPs have been outlined and considered in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
The list of existing and approved projects include Sizewell C Nuclear Power Station, the East Anglia 2 and 1 North offshore wind farms, as well as projects at an early stage, but very likely to come forward (Nautilus and Euro Link interconnector cables). Natural England advise that a robust in-combination effect assessment of the Sea Link project and other projects within the AONB will need to be clearly presented.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies.** The inter-project assessments can be found within A**pplication Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
Suffolk Coasts and Heaths AONB's statutory purpose. Natural England request that a full impact assessment of how the proposed scheme would affect the delivery of SCHAONB's statutory purpose including how its 'special qualities' are impacted.	The assessment of effects on the Suffolk Coast and Heaths AONB, including the statutory purpose, is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
Appendix B - Detailed Comments – 3.1 Evolution of the Kent Onshore Scheme	
It is stated that it is considered likely that potential effects on designated sites for nature conservation will be limited to short term temporary impacts. We would welcome justification and evidence for how the impacts on designated sites for nature conservation will be short term and temporary. As stated previously, Natural England would expect the applicant to use the 'avoid, reduce, mitigate' approach where there are designated sites and protected species	The duration of impacts has been assessed and justified in the ES. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
The landfall option within the blue corridor of option K1, located southeast of Sandwich, would appear to be the landfall option with the least interaction with designated sites. Though this option would rely on Horizontal Directional Drilling (HDD) to cross designated sites at a number of locations (which includes the crossing of the River	This comment is noted and aiming to avoid works within protected sites was a part of the decision making when selecting options. The chosen option at Pegwell Bay and the proposed installation methodology are outlined in **Application Document 6.2.1.4 Part 1 Introduction**

Natural England Comment	National Grid's Response
Stour). If the feasibility at Pegwell Bay (the identified preferred option) determines that HDD is not a viable option. Then great weight should be given to the landfall option identified within the blue corridor (southeast of Sandwich). Natural England advises that the Applicant will need to avoid protected sites in the first instance. Only once all options for avoidance have been exhausted, should the Applicant follow the subsequent steps of the mitigation hierarchy. For Natural England to provide accurate and comprehensive advice on the potential for significant effects on protected sites, we require detailed information on project design, including construction techniques and timing of construction. We would welcome further detailed engagement on the potential corridor route and siting of infrastructure access to the above information, prior to a decision being made on the route to be taken forward. Natural England advise that the landfall option located within the blue corridor of option K1, should be considered as a preferable option if open trenching at Pegwell bay is proposed. This is also subject to the conclusion of HDD feasibility studies along the blue corridor.	**Chapter 4 Description of the Proposed Project**. There is a commitment to make landfall using a trenchless crossing technique beneath the saltmarsh habitat within Pegwell Bay. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Natural England note that the landfall at location K1a (green corridor) has a smaller interaction with designated sites than the proposed landfall within Pegwell Bay. As mentioned above, great consideration should be given to alternate cable landfalls sites if HDD is evidenced to not be feasible at Pegwell Bay. Natural England are concerned of the ecological impact that open trenching could conflict on the designated sites located within Pegwell Bay. Avoidance of these impacts alongside feasibility of HDD locations should be considered by the Applicant when deciding on the preferred route to be taken. We recommend a detailed study of lessons learnt from other cable installations in Pegwell Bay is presented.	This comment is noted and aiming to avoid works within protected sites was a part of the decision making when selecting options. The chosen option at Pegwell Bay and the proposed installation methodology are outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. There is a commitment to make landfall using a trenchless crossing technique beneath the saltmarsh habitat within Pegwell Bay. A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Appendix B - Detailed Comments – 3.3 Ecology and Biodiversity	
Natural England welcome National Grid's commitment to a minimum 10% Biodiversity Net Gain (BNG) across all its construction projects. Natural England would like to draw attention to Kent County Council's Viability Assessment of Biodiversity Net Gain in Kent (June 2022), which assessed the potential effect of a 15% or 20% BNG target on the viability of residential-led development in Kent. Though the assessment focuses on a residential-led development, the assessment showed that the biggest cost in most cases is to get to the minimum 10% BNG. The increase to 15% or 20% BNG in many cases costs much less. As the Kent Nature Partnership (KNP) is working with local planning authorities to progress the adoption of a 20% BNG target within Kent, we therefore recommend that you contact the KNP to discuss higher BNG targets for the Kent onshore section of the Sea Link project. Please refer to Appendix C for further information on BNG for NSIPs	Noted. Biodiversity Net Gain has been discussed with the relevant Local Planning Authorities at thematic meetings. The Proposed Project's target is to deliver 10% for the Suffolk Onshore Scheme and the Kent Onshore Scheme. For further details please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report**.

Natural England Comment	National Grid's Response
Natural England welcomes the use of the latest BNG Biodiversity Metric 3.1 Natural England recommend that the latest Biodiversity Metric should be chosen, prior to the start of the Phase 1 habitat surveys.	Noted, the biodiversity net gain assessment has used the statutory metric. For further details please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**
From 1st October 2022, Eurasian beavers in England became a European protected species. Beavers are now listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017, making it an offence to deliberately capture, injure, kill or disturb beavers, or damage and destroy their breeding sites or resting places without a wildlife management licence from Natural England.	Beaver surveys have been undertaken in the Kent parts of the scheme. Please refer to **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
Natural England note that notable habitats have been scoped out for all phases, on the basis that impacts can be mitigated. As it is not known that HDD will be feasible at Pegwell Bay, it appears premature to scope out notable habitats that could likely be impacted during the construction phase. Natural England advise that notable habitats should be scoped in as temporary habitat loss during the construction phase, until an HDD feasibility study can demonstrate that HDD at Pegwell Bay is viable option.	HDD has been confirmed as the feasible solution for Pegwell Bay. Please refer to **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
Natural England note that habitats with potential to support protected and notable species have been scoped in as temporary habitat loss for all three phases. Natural England view the construction of the 10ha converter station as permanent habitat loss. Therefore, without the completion of Phase 1 habitat surveys within the Kent scoping boundary, it is not yet possible to determine whether these habitats (to support protected and notable species) will be impacted. Natural England advise that permanent habitat loss to habitats with potential to support protected and notable species, should be scoped in at this stage, until Phase 1 habitat surveys have been completed and can demonstrate presence/absence of the habitats.	Noted. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.
Natural England recognise that the cable installation route has the potential for temporary habitat loss within designated sites, following designations; - Sandwich Bay Special Areas of Conservation (SAC) - Thanet Coast SAC - Thanet Coast & Sandwich Bay Special Protection Area (SPA) AND Ramsar site - Sandwich & Pegwell Bay National Nature Reserve (NNR) - Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) We note that the preferred approach for the cable landing at Pegwell Bay is to adopt trenchless techniques such as Horizontal Directional Drilling (HDD), which is proposed to avoid significant impacts to the aforementioned designated sites. Natural England acknowledges the potential benefits of trenchless techniques over the open trenched approach, in that potential significant impacts to the designated sites can be avoided. However, Natural England note that trenchless techniques carry risks (such as frac out and sink holes) which cannot be fully ruled out. To understand these risks at an early stage, a feasibility study with geotechnical data should be prioritised.	Noted. It has since been confirmed (and information shared with Natural England) that HDD is a feasible method and the launch pit is sufficiently distant from these sites that no disturbance impact will arise. Since HDD will be used no significant habitat loss will arise other than some trenching in intertidal mudflat. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.4.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** for further detail.

Natural England Comment	National Grid's Response
Natural England agree with the sites that have been scoped in, however we would welcome a commitment register which includes the commitment of utilising trenchless techniques to make landfall at Pegwell Bay. Natural England request that a feasibility study be published for horizontal directional drilling (HDD) through Pegwell Bay. This would provide reassurance that techniques such as HDD would be feasible, and that open trenching would not be a requirement. We look forward to further discussions with the Applicant on this important area of work	
Natural England note that the possibility of overhead powerlines could affect breeding and non-breeding birds (including notified bird features of neighbouring designated sites) through collision risk. We therefore agree that these impacts should be scoped in at this stage. Natural England would like to signpost the guidance document Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds, which was published by NatureScot in 2016. This guidance document provides advice on how to assess the potential impacts on birds from proposed overhead power lines.	Noted. The assessment of impact of powerlines on birds is being shared and discussed with Natural England in advance of DCO submission.
Natural England note that the incidental mortality of non-breeding intertidal and terrestrial birds has been scoped out for all three phases of the development. As overhead collisions from proposed powerlines could affect non-breeding birds, incidental mortality should be scoped in at this stage. Due to the potential of overhead collisions from proposed overhead powerlines, Natural England advise that incidental mortality of non-breeding intertidal and terrestrial birds should be scoped in for all three phases of the development.	Noted. The assessment of impact of powerlines on birds is being shared and discussed with Natural England in advance of DCO submission.
The proposed location of the 10ha converter station is likely to be located in an area with a number of waterways, which also includes the Minster Stream. These waterways could potentially be permanently impacted by the development of the proposed converter station. It is therefore also conceivable that incidental mortality of riparian mammals could occur, though the risk would be minimised by appropriate mitigation. Due to the scale of the proposed converter station, there is a high chance that waterways could be permanently impacted by the development. For this reason, we advise that incidental mortality for riparian mammals should at this stage be scoped in for the construction phase.	Incidental mortality are discussed within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity** but in practice since such mortality would be an offence given the legally protected status of the mammals in question, measures would be in place to prevent it occurring. The ecological impact assessment starts from an assumption of compliance with the law.
Appendix B - Detailed Comments – 3.7 Agriculture and Soils	
Natural England agree with the proposed Study area for the soils and agriculture assessment (including the Agricultural Land Classification (ALC) and soil survey, which will include all temporary land-take areas). The ALC and soil survey must be undertaken by suitably qualified and experienced individuals	The quality of the land affected by the Proposed Project is assessed and reported within **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils** and **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils**. Due to Health & Safety limitations relating to potential UXO presence, land grade are assessed in the ES through a predictive approach (following the methodology set out by the Welsh Government). This process predictive mapping will be undertaken by experienced ALC surveyors and consultation on this approach has been undertaken with NE. The data used for the predictive mapping, and the results, are fully detailed in the appendices to the chapter.
Natural England note that the temporary loss of soil quality and associated ecosystem services has only been scoped in for the construction phase.	Where available, further information on the likely scale of known maintenance activities is set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Proposed Project Description.** All maintenance or repair operations will be undertaken in line with published

Natural England Comment	National Grid's Response
It should be noted that during the operational lifetime of the proposed cable route, there is a potential for additional disturbance (excavation) of soil resources to occur during any maintenance or remedial works which may be required. Although the scale and extent of these works would be significantly less than required for initial construction, being confined to the specific areas of cable where maintenance is required	good practice at the time and this is set out in the assessment presented within **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils** and **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils.**
Natural England welcomes reference to the Good Practice Guide for Handling Soils, which includes soil mitigation measures in line with the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites. Natural England welcomes reference to measures on how soil disturbance can be minimised. We would like to signpost the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (which provides detailed advice on the choice of machinery and method of their use for handling soils at various phases).	Noted, no further response required.
Appendix B - Detailed Comments – 3.9 Air Quality	
Natural England understand that the commitment to IAQM mitigation has been considered sufficient to conclude no damage will occur. Whilst this is typically an acceptable approach, a degree of quantitative modelling would be preferable with regard to Sandwich Bay to Hacklinge Marshes SSSI, to provide certainty that any identified impacts are fully mitigated. We advise that a reasoned argument may be acceptable without quantitative modelling in the case of dust emissions, but we would hope for a robust argument stating/explaining why the dust suppression is adequate. Some commentary relating to duration of the activity or chemical nature of the dust (i.e. inert or not) would help in providing us with confidence that a reasonable justification has been provided.	Noted. A qualitative discussion as to the adequacy of dust suppression measures in the ES has been included in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2: Ecology & Biodiversity.**
Appendix B - Detailed Comments – 4.2 Physical Environment	
Baseline conditions should also include temperature and salinity. The sedimentary baseline appears to only consider marine sediment quality, but it should also include sedimentology and the sedimentary environment. Temperature and salinity variations should be considered. Sedimentology and the sedimentary environment should be considered (e.g. properties such as sub-seabed conditions, sediment grain properties, susceptibility to scour, seabed mobility). In addition, bedform dynamics and stability also need to be scoped in and assessed	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been revised to include Temperature, Geomorphology and Sediment Transport in the baseline.
Surge effects are not mentioned, but it is important to consider them. Surge water levels should be scoped in and assessed.	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been revised to include Surge effects.
Only four metocean data sites selected have been used, and these are rather sparsely distributed along the cable route. The metocean data locations should be sufficient to characterise the hydrodynamic conditions along the cable route and also any areas of seabed complexity (e.g. sandbanks, channels, bays) In order to understand the range of hydrodynamic conditions along the proposed cable route, the number of metocean sites should be kept under review as the EIA progresses to ensure there is sufficient resolution and confidence in the hydrodynamic assessment.	Data sources in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** have been refined following engagement with Natural England.

Natural England Comment	National Grid's Response
Spring peak flow is 0.58m/s at P4 (Kent landfall) whereas Neap peak flow is given as 0.74m/s. Is this correct? Please can this be clarified through future engagement with the Applicant?	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify this.
There is no description of the conditions at P1-P4 such as the water depth and distance offshore. There is also no information regarding the range of conditions covered by the hydrodynamic data. The environmental conditions at the metocean data site locations should be provided, along with the range of wave and tidal conditions from which the extracted data have been sourced.	Data sources in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** have been refined following engagement with Natural England.
It states that the 'wave and wind roses for these points …indicate that at the Kent landfall the dominant winds are from the north-east and south. Along the Offshore Scoping Boundary and up to the Suffolk landfalls, the dominant winds are from the south-west. The largest waves at the Kent landfall are from the north-east and south-west, and towards the Suffolk landfalls they are from the north-east and south'. However, the dominant waves are from the north-east and south at the Kent landfall and along the Offshore Scoping Boundary and up to the Suffolk landfalls. This should be clarified. In addition to wave height and direction, wave period should also be provided in future assessments and reports.	Data sources in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** have been refined following engagement with Natural England.
We welcome the large-scale bathymetry across the proposed cable corridor. However, it does not state the age of the bathymetric data shown in Figure 4.2.4. This would be useful in order to understand whether these data are recent. Furthermore, the broad scale bathymetry shown in Figure 4.2.4 does not provide sufficient information about the dynamic nature of the seabed along the cable route such as bedform size, orientation and asymmetry, as well as sandbank and channel configuration. The age of the bathymetry in Figure 4.2.4 should be stated and, if these data are not recent (i.e. less than 5 years old), then more recent bathymetry data should be sought for the cable corridor. Finer resolution bathymetry should also be considered for areas of mobile bedforms or within /near protected areas. The need for intertidal topographic survey should also be considered for the landfall locations.	Data sources in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** have been refined following engagement with Natural England.
No sensitive geological features have been identified in the vicinity of the proposed cable route. However, geological interest features listed in the Sandwich Bay to Hacklinge Marshes SSSI citation are of high value and should be considered. We advise that all sensitive geological features should be identified, scoped in and considered adequately.	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to include all relevant sensitive features.
Geomorphological features are not discussed in this section. Yet, a key element of the baseline characterisation process is to identify any nearshore and offshore morphological features, to establish trends in their morphological change and to assess their potential sensitivity to impacts over the lifetime of the project. Nearshore and offshore geomorphology should be adequately characterised in terms of the seabed features present along or near the cable route, and trends in their morphological change.	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to include Geomorphology and Sediment Transport.
Sediment transport pathways are not discussed here, nor are sediment transport rates. It is important to characterise the sediment transport processes across the study area, in order to understand and assess potential impacts due to interaction with cable protection measures and crossings. There are also complex sediment transport pathways in certain regions along the proposed cable route which need to be given	**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to include Geomorphology and Sediment Transport.

Natural England Comment	National Grid's Response
careful consideration. Sufficient information is required to characterise the range of sediment transport pathways (including a map) and rates across the study area, for a range of wave and tidal conditions. This is important to help inform understanding and any modelling of the magnitude and variability of the driving forces behind sediment transport and to provide context to any predictions made regarding impact of the proposed scheme.	
How may the coast evolve naturally over the lifetime of the project? Historic and more recent trends in morphological change at the coast should be scoped in and assessed (including beaches, dunes, cliffs, saltmarshes, mudflats etc). This includes determining natural variability, both spatial and temporal. Recent data should be analysed alongside longer term records. Inter-annual beach variability should be considered. Survey data should also provide coverage of the full intertidal area.	Detailed assessments have been undertaken for both the Kent and Suffolk landfalls using available topographic monitoring data from LiDAR and beach profile surveys. The datasets span several decades and have been analysed to provide a baseline understanding of natural variability in morphology covering an appropriate extent of the coastline at both landfall sites. The available information was used to provide an interpretation of future morphological evolution and subsequently to inform the assessment of impacts, as discussed in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** (see Section 1.9 - Assessment of Impacts and Likely Significant Effects).
Table 4.2.4 presents potential impacts due to construction, maintenance and decommissioning phases combined which makes it difficult to distinguish impacts associated with each project phase. Rows 2 and 3 present the Impact as 'Disturbance of coastal morphology' due to cable installation, maintenance, removal activities and presence of cable protection. However, this does not distinguish sensitive areas of seabed/substratum (and species), smothering, change of sediment type, or the presence of ancillary infrastructure. Row 5 similarly considers the impact of changes to seabed morphology due to cable installation/removal including route clearance and cable lay activities. However, once again, this does not distinguish sensitive areas of seabed/substratum (and species), smothering, change of sediment type. Row 6 The impact of changes in metocean conditions has been scoped out. However, in shallow nearshore areas, there is the potential for ancillary infrastructure (e.g. cofferdams) or seabed excavation (e.g. for HDD exit pits) which could cause modification of the nearshore hydrodynamics and give rise to morphological change. We would advise that it would be easier to understand potential impacts due to each project phase, if they could be separated out in this table. We also advise that careful consideration be given to the wording of the potential impacts in Table 4.2.4. Until a route is selected, depth of water is not confirmed, and cable crossings could impact water already shallow, the impact of changes to metocean conditions should be scoped in for shallow nearshore areas. Furthermore, surface laid/external cable protection could impact hydrological conditions including waves/currents and this should be scoped in. Additionally, if there is any ancillary infrastructure present during construction (e.g. cofferdams or temporary floatation pits) which might give rise to changes to waves and/or current flows.	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.
Row 3: Changes to coastal morphology/nearshore and offshore seabed morphology are not receptors, it is only the coastal morphology/nearshore and offshore seabed morphology that are the receptors. Row 5: Coastal Erosion is not a receptor, rather it is the coastline that is a receptor. Seabed morphology describes a range of seabed features but it may be necessary to consider specific features individually, such as the coastline at landfall, sandbanks, channels etc. For example, the sandbanks located off the north Kent coast are believed to influence coastal processes and sediment transport patterns, and sand from these banks feed onshore, naturally replenishing the sand beaches	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.

Natural England Comment	National Grid's Response
along the Thanet coast. The receptors in Table 4.2.5 should be carefully identified. It would also be helpful if the receptors could be established earlier in the section and include significant morphological features such as the coastline(s), sandbanks, and channels, sandwave fields, and also include designated sites. All designated sites within the project's Zone of Influence (ZoI) should be identified in this section, even if they are being assessed elsewhere.	
The different project phases are combined for each potential effect in Table 4.2.6 which makes is difficult to consider each project phase fully. 1st Potential Effect 'Increase in SSCs as a result of construction, maintenance, operation and decommissioning along the cable route and at the landfall sites', it will also be necessary to consider background levels of SSC and also the anticipated persistence of sediment plumes (particularly near sensitive habitats or features). Where existing modelling and analysis results are used, it will be necessary to demonstrate that they are adequate and directly relevant and applicable to the proposed project. We would advise that potential effects should be separated out for each project phase in future reports and assessments. For the first potential effect 'Increase in SSCs as a result of construction, maintenance, operation and decommissioning along the cable route and at the landfall sites', we would advise that background SSC levels will need to be assessed (as this will guide how sensitive the receptors are to temporary increase in SSC), and also the persistence of sediment plumes. It should also be shown how any existing numerical modelling and analysis results are relevant, applicable and sufficient to assess the potential effect for the proposed project.	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.
2nd Potential Effect: Disturbance to Coastal Morphology. It is not stated what this potential effect is attributed to, what is the source? Disturbance to coastal morphology could be due to seabed excavation in shallow nearshore waters (e.g. for HDD exit pits), and/or the presence of cable protection measures in shallow nearshore waters, and/or the presence of temporary work structures etc. Therefore, the causes of disturbance to coast morphology should be stated and considered separately	Suffolk and Kent coastline morphology, including Sandwich Bay to Hacklinge Marshes SSSI and The Haven SSSI has been included in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
Potential Effect: Changes to Coastal Erosion at the Landfall Sites. In addition to coastal retreat, there is also vertical change to the beach profile which needs to be considered. The applicant needs to consider, in any assessment, how the coast at landfall may alter throughout the lifetime of the project both in terms of coastal retreat and vertical change to beach profiles.	Suffolk and Kent coastline morphology, including Sandwich Bay to Hacklinge Marshes SSSI and The Haven SSSI has been included in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
There are a number of other potential effects which do not appear in Table 4.2.6 including: • The extent to which sensitive areas of seabed/substratum may be disturbed during cable installation • The extent to which seabed areas adjacent to the cable will be smothered by the settling of disturbed sediment • The anticipated spatial extent of change to sediment type and persistence • Alteration of sediment transport patterns and morphological change due to sandwave clearance and	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.

Natural England Comment	National Grid's Response
disposal of removed material • Scour (and secondary scour), and removal of seabed sediments, due to cable exposure and/or protection measures The full range of potential effects need to be scoped in, considered and assessed. Where the Applicant considers this unnecessary justification and evidence to support this conclusion should be provided to allow these effects to be scoped out at a later stage during the pre-application process.	
Table 4.2.8 does not consider project phase i.e. construction/operation and/or decommissioning Magnitude criteria definition should also consider project phase.	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.
Further to our earlier comments on Table 4.2.6, there are a number of significant effects which should be scoped in for assessment, including: • Smothering of seabed areas adjacent to the cable by the settling of disturbed material released into the water column during cable installation • Change of sediment type and persistence of this change due to cable installation • Modifications to sediment transport patterns and resulting morphological change due to sandwave clearance • Modification of the nearshore hydrodynamics or diversion of sediment transport pathways resulting in morphological change (including to dunes, cliffs, saltmarsh and mudflats) due to the presence of cable protection measures in shallow nearshore waters. There are a number of other significant effects which should be scoped into the assessment. Marine cable route is to MHWS and therefore activities within this cable route also has potential to impact the receptor and should be scoped in at this stage.	The structure of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** has been updated to clarify impacts and receptors following engagement with Natural England.
Appendix B - Detailed Comments – 4.3 Benthic Ecology	
The Applicant has not provided any reference to support their assertion that a screening distance of 2km for intertidal benthic ecology and 10km for subtidal is appropriate. Support all statements with appropriate references in future reports and assessments	The Study Area, a 10 km wide area around the Offshore Scheme centre line, has been selected as it encompasses all potential impact pathways for benthic receptors. This is based on an understanding of the extent of likely impacts of the Offshore Scheme, providing a precautionary geographic context, and encompassing the relevant functional habitats and range of movement for mobile benthic species. This zone of influence (ZOI) has also been used to screen for designated sites for benthic ecology receptors.
Subtidal benthic habitats which were found during 'Project specific benthic surveys' are stated. There is no mention of benthic habitats surveyed within and adjacent to MCZs in the Offshore Scheme, namely Goodwin Sands and Kentish Knock East MCZ which are designated for benthic features. The presence of protected features within the study area of the project, particularly where there is overlap with designated sites, must be clearly stated. For us to fully consider any potential impact we will need to see the survey data which has been used to assess the impacts of the project.	The Offshore Scheme Boundary at Area 5 has been refined to avoid the western boundary of the Goodwin Sands MCZ. The corridor now runs parallel to this designated site for approximately 3.2 km. The route does not go through Kentish Knock MCZ, but is has been scoped in for temporary increase in SSC in the associated MCZ Assessment.
Table 4.3.1 Natural England advise that the table also includes other information namely the feature conditions and General Management approach (GMA) for the sites.	Noted, no further response required.

Natural England Comment	National Grid's Response
Text states; '…the possibility of avoidance of the Goodwin Sands MCZ by the Offshore Scheme.' We recommend that care is taken to avoid the sensitive features of Goodwin Sands MCZ. Kent & Essex IFCA have conducted Sabellaria mapping surveys in 2021 and 2022 which will need to be considered once these are externally available. Natural England would expect the applicant to use the 'avoid, reduce, mitigate' approach where there are designated sites and protected species. If designated sites cannot be avoided, the route which reduces the impacts should be chosen. Such as, an area of the site which would be least detrimental to the qualifying features/habitats. We encourage the applicant to engage with us early within the design stage to determine any mitigation. If the project cannot avoid works within the Goodwin Sands MCZ then, given recent decisions on NSIPs with similar impacts to designated sites with similar features, we advise that there may be a need to discuss the production of an in principle Measures of Equivalent Environmental Benefit (MEEB) plan. Natural England is willing to work with the applicant during the pre-application phase to further discuss this issue.	Noted, the Project has committed to avoidance of Goodwin Sands. The Offshore Scheme Boundary at Area 5 has been refined to avoid the western boundary of the Goodwin Sands MCZ. The corridor now runs parallel to this designated site for approximately 3.2 km.
Text states; '…aim to minimise impacts by micro siting around sensitive features where possible.' Natural England welcome the use of micro siting to avoid sensitive habitats/features.	Noted, no further response required.
Text states; '…use of a trenchless cable installation method to minimise habitat loss and disturbance within the intertidal zone.' Natural England welcome the use of methods which result in reduced environmental impact. However, we advise timely geotechnical surveys to confirm the likelihood of success of Horizontal Directional Drilling (HDD).	Noted, Pre- installation geophysical surveys have been included within this preliminary assessment for both construction and maintenance. The feasibility of trenchless techniques has been confirmed by geotechnical surveys and presented in the Suffolk Landfall Feasibility Technical Assessment and Kent Landfall Feasibility Technical Assessment (Appendix A of **Application Document 7.3 Design Development Report**).
Construction Environmental Management Plan (CEMP) Natural England advise that if any mitigation or measures to reduce environmental impact are relied upon in the CEMP then we should be consulted on this document and this consultation should be secured within the Development Consent Order (DCO).	Noted, no further response required.
The implementation of LVSO5 as stated will not eliminate all risk as it states; '…the use of biodegradable drilling fluids (PLONOR substances) where practicable.' This does not imply it will never be used. If there is a possibility of using a non-inert fluid it should be scoped into the assessment.	The Proposed Project will use PLONOR substances during landfall construction. A full list of mitigation measures used to avoid likely significant effects was detailed in PEIR Volume 1, Part 4, Chapter 3: Benthic Ecology and Chapter 4: Fish and Shellfish and is now included in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology, Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** and **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC).**
Changes to marine water quality from HDD and drilling fluids, accidental leaks and spills from vessels, and the introduction and spread of Invasive Non- Native Species (INNS) via vessel hull or ballast water are all scoped out due to implementation and control of stated management measures. If there is potential for an impact without management measures in place, these should be scoped in.	Impacts from accidental leaks and spillages have been scoped into the ES in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology and Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.**
Underwater sound impacts on marine invertebrates during construction, maintenance and decommissioning is scoped out. Until the construction details are known, Natural England advise that the receptors for the impact pathway are scoped in.	Impacts from underwater sound has been scoped into the ES in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology.**
EMFs are scoped out.	Impacts from EMF has been scoped into the Environmental Statement **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology.**

Natural England Comment	National Grid's Response
In absence of an estimation of EMFs potentially arising from cables both at exterior of cables and at surface of seabed above buried cables, EMF should remain scoped in.	
Appendix B - Detailed Comments – 4.4 Fish and Shellfish Ecology	
The data used within these tables is from 1998 and 2012 (Ellis et al., 2012), (Coull et al., 1998). We recommend up to date evidence is gathered on the importance of the study area for spawning and nursery grounds of fish species. Natural England can provide up-front advice on the scope, methodology and suitability of site-specific surveys for designated fish species through the Discretionary Advice Service (DAS).	The Study Area has now been extended to cover Herne Bay, and Eagle Bank and Osea Island in the Black Water Estuary. This has been discussed in ES **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.** A detailed analysis of herring spawning grounds has been undertaken, and the study area for this analysis agreed with the MMO and relevant stakeholders. This is presented in A**pplication Document 6.3.4.3.A Appendix 4.3.A Herring and Sandeel Assessment**.
As stated, native oyster (Ostrea edulis) is a feature of the Dover to Deal MCZ and blue mussel (Mytilus edulis) beds are a feature of Goodwin Sands and Thanet Coast MCZ. The applicant should consider these features within the EIA, and if necessary micro-route the cable installation to avoid disturbance and smothering from higher than background levels of settlement of suspended sediments. Identify extent of shellfish features and avoid through micro-routing	All features of the Goodwind Sands MCZ and Dover to Deal MCZ have been considered in Application Document 6.11 Marine Conservation Zone Assessment. The Offshore Scheme Boundary at Area 5 has been refined to avoid the western boundary of the Goodwin Sands MCZ. The corridor now runs parallel to this designated site for approximately 3.2 km.
The cable route passes through the jurisdiction of two IFCA authorities (Kent & Essex IFCA (KEIFCA) and Eastern IFCA for Suffolk). Within the study area of this project there are several closed areas for bottom towed fishing gear, such as the prohibited use dredges and trawls, due to the presence of sensitive features. This consists of: • Margate and Longs Sands Area A • East Margate Sands • Thanet Coast SAC In addition, there are larger areas with partial restrictions as follows: • Fishing restriction, unless carried out from a beach or a vessel <17m in length, along the whole KEIFCA boundary • Inshore trawling restriction for vessels >15.24m in length for 3nm offshore along the whole Eastern IFCA boundary • Towed gear restriction for vessels >14m in length fishing for mussels along the whole Eastern IFCA boundary In addition, there are larger areas with partial restrictions as follows: Fishing restriction, unless carried out from a beach or a vessel <17m in length, along the whole KEIFCA boundary Inshore trawling restriction for vessels >15.24m in length for 3nm offshore along the whole Eastern IFCA boundary Towed gear restriction for vessels >14m in length fishing for mussels along the whole Eastern IFCA boundary Further information on these restrictions can be found by contacting the relevant IFCAs and on this weblink View all Restrictions (kingfisherrestrictions.org)	These areas were considered as part of the Proposed Project routeing and siting documents. The Proposed Project is not expected to impact these closed areas for fishing.

Natural England Comment	National Grid's Response
The Applicant should be mindful of any closed shellfish beds and the effects of smothering from sandwave clipping/cable installation and burial on these resources. Contact Kent and Essex IFCA for Kent and Eastern IFCA for Suffolk, for the most recent closed area information. Additionally, check Bottom Towed Fishing Gear Byelaw: We note that Margate and Long Sands Area A is avoided by the cable corridor see View all Restrictions (kingfisherrestrictions.org)	These areas were considered as part of the Proposed Project routeing and siting documents. The Proposed Project is not expected to impact these closed areas for fishing.
Consideration of essential fish habitat (Sabellaria reef in Goodwin Sands MCZ, sand banks, gravels), particularly for species such as herring (spawning) and Sandeel (burrows) should be considered. Fish species provide an important food source to designated Annex II bird populations and cetacean features within the cable corridor and where possible the route should be micro-routed to avoid these habitats. Fish distribution changes temporally as well as spatially so existing data may not be representative of the current fish community.	The re-routing of the Offshore Scheme will reduce direct impacts to the known and potential benthic receptors located within the area, including Sabellaria reef, subtidal sand and subtidal coarse sediment (see **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology**). This follow the mitigation hierarchy, avoiding impacts to the features and conservation objectives of Goodwin Sands MCZ.
Cephalopods (i.e. squid, cuttlefish and octopus) have not been discussed in the Baseline section. Consider and assess cephalopods in the baseline characterisation.	The species identified by Natural England have been reviewed and a meeting to discuss fish and shellfish scoping opinion comments was attended on the 31 May 2023. Cephalopods are included within the baseline, for further detail, please refer to **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology**.
Poor cod (Trisopterus minutus) is common in UK waters, though less so in the Southern North Sea, it is an important food source for commercial species such as cod. They should be considered within the baseline for fish and shellfish ecology. Consider and assess poor cod as part of the baseline characterisation	The species identified by Natural England have been reviewed and a meeting to discuss fish and shellfish scoping opinion comments was attended on the 31 May 2023. Poor cod are included within the baseline, for further detail, please refer to **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology**.
Mediterranean scaldfish (Arnoglossus laterna) can be found all around the British Isles, along with greater and lesser weaver fish. These should be included in the baseline characterisation. Mediterranean scaldfish, greater and lesser weaver fish should be considered and assessed within the baseline charaterisation.	The species identified by Natural England have been reviewed and a meeting to discuss fish and shellfish scoping opinion comments was attended on the 31 May 2023. Mediterranean scalfish are included within the baseline, for further detail, please refer to **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology**.
Migratory fish – Smelt (Osmerus eperlanus) are a feature of conservation importance for the Medway MCZ and are also present within the wider Thames and Swale Estuary MCZ. Smelt migrate to spawning streams during spring (March – April). MCZ features are not afforded protection outside the boundary of the site however, consideration of the migratory period and any potential effects to these fish demonstrates the potential for supporting nature recovery. Consider timing of installation to avoid migratory fish	Migratory fish have been included in the environmental assessment in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.** Migratory fish are included within the baseline, for further detail, please refer to **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology**.
Migratory fish – European Eel (Anguilla Anguilla) – IUCN red list species considered critically endangered. Glass eels migrate into rivers to continue their life cycle and mature to silver eel which migrate out of rivers back to the Sargasso Sea. Consideration of impacts of the proposed works on fish migratory routes could be included in the scoping to consider biodiversity net gain / nature recovery in the wider environment. Consider timing of installation to avoid migratory fish	Migratory fish have been included in the environmental assessment in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.**
Most of the sources and impact pathways for fish and shellfish ecology have been scoped in, except for marine water quality changes/ We broadly agree with the breadth of construction, maintenance and decommissioning impacts which have been scoped in. However, there is the potential disturbance to habitats and species through the creation of new habitats for colonisation and this should be considered within the impact assessment (I.e.	Noted, no further response required.

Natural England Comment	National Grid's Response
artificial reef effect in areas dominated by soft sediment). We would also like to highlight that marine water quality changes from vessels and cable installation have been scoped out based on management measures which will be implemented. If there is a pathway for impact before mitigation, this should still be scoped in.	
4th Bullet Point: identify appropriate mitigation to reduce any likely ecological impacts. In line with our comments to 4.4.4.14, we are concerned with fish and shellfish species that spawn on the seabed with the study area. Knowledge of the most sensitive spawning period should be identified, and cable installation activities planned to avoid these periods, where possible. Additional actions which could be considered to reduce the severity of effects on fish and shellfish receptors include careful consideration of the cable installation equipment, optimum cable burial depth, and minimising the cable trench footprint.	A full herring and sandeel spawning assessment, including potential effects to these receptors has been undertaken in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology.**
We agree with the designated sites which have been scoped in for fish and shellfish ecology	Noted, no further response required.
Appendix B - Detailed Comments – 4.5 Marine Mammals	
The Applicant has listed several different methods for screening in designated sites for cetaceans. However, it is not clear what approach will actually be taken. There are other designated sites, Nature Conservation Marine Protected Areas (NCMPAs), for non-Annex II species in Scotland, however, given the distance between the project and Scottish waters, any connectivity is likely to be negligible. It is difficult to provide detailed advice when the information provided in the scoping report is quite broad. Natural England advises that all sites within the relevant Management Units (MUs), for species with likely presence in the impact areas, are considered scoped in. Then, for each of these sites, the applicant should assess the potential for connectivity between the project and the designated site. For example, for harbour porpoise, it is considered that all individuals in the North Sea MU are connected to the SNS SAC. For bottlenose dolphin, connectivity to the Moray Firth SAC should be assessed. For seals, this should be based on telemetry data and known foraging ranges.	For the PEIR, a list of all designated sites with relevant protected features was provided in Section 4.5.7 Baseline Conditions of **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals**. This is based on a regional approach rather than distance a distance of 50 km, giving consideration to relevant ecology and habitat connectivity, and marine mammal management units. The same approach has been applied to the ES (see **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals**).
The Applicant has not provided any reference to support their assertion that a screening distance of 50km for cetaceans is appropriate. All statements should be supported with appropriate references in future reports and assessments. The screening distance of 50km is far smaller than the foraging ranges for cetaceans and relevant literature and evidence should be reviewed when assessing the screening distance for cetaceans. We will continue to engage with the applicant through the pre-application phase to provide further advice.	For the PEIR, a list of all designated sites with relevant protected features was provided in Section 4.5.7 Baseline Conditions of **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals**. This is based on a regional approach rather than distance a distance of 50 km, giving consideration to relevant ecology and habitat connectivity, and marine mammal management units. The same approach has been applied to the ES (see **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals**).
The Applicant has listed several different methods for screening in designated sites for seals, however it is not clear what approach will actually be taken. There is also no reference to support the 135km screening distance which was chosen for seals. Natural England are supportive of using the Southeast England Assessment/Management Unit (MU) for screening in UK harbour seal designated sites. However, the Applicant should review the latest evidence, such as Carter et al. (2022), and telemetry data for future reports and assessments. This literature provides updated foraging ranges for the two seal species. To illustrate, it has been documented that maximum foraging range of grey seal to be 448 km. Harbour seals have smaller foraging ranges and so limited movements between MUs. Harbour seals in The Wash have a larger foraging range than those at other colonies (Sharples et al., 2012) and this should	Key sites designated for the protection of marine mammals have been initially screened in using the relevant MUs defined by IAMMWG for each species. The sites within each MU have been considered, based on available knowledge of species ecology and connectivity, for relevance to project activities. For cetaceans, relevant guidance regarding the disturbance from underwater sound has been used to determine a preliminary screening distance, whilst for pinnipeds, screening distances have been selected based on known foraging ranges (448 km for harbour seals, 273 km for grey seals).

Natural England Comment	National Grid's Response
be considered by the Applicant. Due to the larger foraging ranges of grey seal, and the known movements of grey seals between colonies along the east coast of England, we consider it appropriate to also screen in the Northeast England MU. The Applicant should assess the potential for connectivity between designated sites in the Northeast England MU and the project area, as well as connectivity to the Humber Estuary Special Area of Conservation (SAC). We consider the approach of using telemetry data to determine connectivity is favourable compared to using a single foraging range, which is over-simplistic and does not reflect the variation in movements intra- and inter-sites. Telemetry data can also be used to determine connectivity to transboundary sites.	
The data sources to be used to characterise the marine mammal baseline are considered appropriate. In addition, we welcome the use of local reports, for example from the Thames seal group. No action needed.	Noted, no further response required.
Despite appropriate sources being listed, the Applicant has only used two sources to characterise cetaceans here. We expect that the characterisation of cetacean presence in the EIA will be more comprehensive and use all the listed sources. Use all the listed sources to characterise the marine mammal baseline in future reports and assessments.	Data sources have been checked and updated as appropriate in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
It is not clear which cetacean species the Applicant is screening into their EIA, as the applicant has stated that 4 species of cetacean commonly occur within the Greater North Sea Ecoregion and another 5 species occur in the region but are less common. It is then stated that harbour porpoise are the most common species observed in the Small Cetaceans in European Atlantic waters and the North Sea (SCANS-III) survey area The Applicant should clearly state which cetacean species they are screening in in future reports and assessments. We agree that harbour porpoise should be scoped in and advise that the Applicant refer to the relevant literature when assessing the occurrence of and potential impacts on cetacean species. We will continue to engage with the Applicant through the pre-application phase to provide further advice.	Species screened into the assessment have now been clarified within **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
The list of sites presented in Table 4.5.2 is not consistent with the screening approach outlined in the text. The Wash is also a designated Ramsar site and SSSI with a harbour seal feature. The Humber Estuary also has overlapping designations with grey seal as a feature. These sites should be scoped in for potential effects on marine mammals. Therefore, designated sites should be reviewed for future reports and assessments, based on the advice provided in our detailed comments.	Noted, no further response required.
The Applicant has stated that they will adhere to the JNCC mitigation guidelines for piling, geophysical surveys and UXO detonation where appropriate. Whilst we are supportive of this in principle, piling is not within the project description.	We note this, piling is considered a worst case impact in terms of underwater sound. This has now been clarified within **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
The need for additional mitigation documents should be considered in future reports and assessments: • A Site Integrity Plan – this will be needed if the Applicant cannot exclude the potential for an adverse effect on integrity (AEoI) of the Southern North Sea SAC due to in-combination underwater noise disturbance. • A Vessel Management Plan – it is best practice for vessels to implement measures that reduce potential impacts on marine mammals. If these measures are relied upon as mitigation in the EIA or HRA, then they must be secured.	This is noted. The additional mitigation documents for the Proposed Project are constantly under review during the preparation of the ES up to submission.

Natural England Comment	National Grid's Response
Consider the need for the additional mitigation documents listed in future reports and assessments. We will continue to engage with the Applicant through the pre-application phase to provide further advice.	
The Applicant has listed that UXO clearance is a source of noise during construction. It should be clarified whether UXO clearance will be undertaken as part of this licence or a separate Marine Licence. Refer to joint interim position statement on UXO clearance (available here) when determining appropriate clearance methods and mitigation.	A detailed assessment for UXO detonation is not included in the ES as this will be a separate marine licence application post-DCO submission.
The Applicant should clarify whether geophysical surveys will be undertaken as part of the marine licence for the project or through the separate licencing process. Clarify licencing for geophysical surveys, for both construction and maintenance phases.	Pre-installation geophysical surveys have been included for both construction and maintenance.
Geophysical surveys are also a source of underwater sound impacts on marine mammals. Include geophysical surveys in the assessment of underwater noise impacts.	Noted, Pre- installation geophysical surveys have been included within this preliminary assessment for both construction and maintenance. An assessment is included in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
Natural England is in broad agreement with the impact pathways proposed to be scoped in and out for marine mammal receptors. No action needed	Noted, no further response required.
The Applicant has listed that species which are legally protected are of Very High importance; we consider this definition applicable to all cetaceans as they are all European Protected Species. Consider that all cetaceans have Very High importance within future reports and assessments	Noted, no further response required.
Appendix B - Detailed Comments – 4.6 Marine Ornithology	
The cable will pass through the Outer Thames Estuary SPA, of which red throated diver (Gavia stellata) is a designated feature There is potential here for displacement of red throated diver this impact will need to be assessed and considered both from an EIA and HRA perspective. Therefore, we encourage early engagement with Natural England before the application stage, to allow a full assessment of the project's impacts and for the appropriate mitigation measures to be applied. Natural England would note that the applicant has engaged with us already and that we anticipate this engagement will continue throughout the pre-application period and beyond. We would like to refer the Applicant to Natural England's advice on seasonality Designated Sites View (naturalengland.org.uk) and the joint Statutory Nature Conservation Bodies' advice for displacement: Joint SNCB Interim Advice On The Treatment Of Displacement For Red-Throated Diver (2022) (jncc.gov.uk) Joint SNCB Interim Displacement Advice Note (jncc.gov.uk). We recommend careful timing of works to ensure they fall outside of the sensitive winter period for the Red Throated Diver and where possible to avoid and minimise traffic during the most sensitive time in January, February and March. We recommend that existing shipping lanes and vessel transit routes should be used to avoid additional disturbance, and that vessel operators are made aware of the importance of the species, to avoid rafting birds and areas with high densities of birds	For red-throated diver, the Proposed Project is committing to a full seasonal restriction (1 November – 31 March) for offshore cable installation activities in the Outer Thames Estuary SPA and a reduced seasonal restriction (1 January – 31 March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. This will be in place for the purpose of assessing against cumulative effects, rather than the Proposed Project on its own.
It is not clear what site-specific studies the author is referring to in the last bullet point. These appear to be species specific only	A comprehensive review of existing data and literature produced for surrounding infrastructure projects such as Offshore Wind Farms (OWF) was undertaken in the PEIR Chapter to identify other important ornithological features that are not qualifying features of relevant designated

Natural England Comment	National Grid's Response
Suggest further information is provided for clarity.	sites. These species include those of principle importance. **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** of the ES, details how baseline data have been compiled, through both a desk study and carrying out ornithology surveys at both landfall sites.
Natural England agree that the use of a 10 km study area is a proportionate study area for understanding the impact of this project. This is congruous with SNCB guidance for the species for which the sites are designated. None.	Noted, no further response required.
The text here suggests Ramsar sites are European sites. This is not the case, however, we note that it is policy to treat Ramsar sites as European sites. The last sentence is also unclear. We note that no named species are mentioned in the remainder of this chapter yet this paragraph states that "only qualifying bird species which have the potential to be present in the ZOI of the Offshore Scheme are considered further within this chapter". This text should be changed, or text should be amended in the following paragraphs to consider named species. If any designated species are scoped out, a clear rationale for this should be given. Suggest amendment to make this clearer and further engagement to ensure all designated species are assessed and that any species scoped out is done so with agreement. Without further clarity we would recommend all designated species are considered scoped in.	A comprehensive review of existing data and literature produced for surrounding infrastructure projects such as Offshore Wind Farms (OWF) was undertaken in the PEIR Chapter to identify other important ornithological features that are not qualifying features of relevant designated sites. These species include those of principle importance. **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** of the ES, details how baseline data have been compiled, through both a desk study and carrying out ornithology surveys at both landfall sites.
When evaluating the information on Natural England's Designated Sites Viewer, the Supplementary Advice on Conservation Objectives (SACOs) should also be considered. Targets for each attribute should also be reviewed for assessment. Suggest amendment in future reports and assessments.	Noted, no further comment required.
References for the JNCC's SACOS (296) and NE's Designated Sites Viewer (297) are non-site specific and are generic websites. We would welcome direct links to the advice used alongside the dates the advice was accessed. Suggest amendment in future reports and assessments.	Noted, no further comment required.
The author provides some detail as to how some onshore populations may be monitored. Section 4.6.7.2 states that no offshore bird surveys are to be undertaken. It is unclear what data will be obtained, what data will be used, and how impacts will be understood. Further information should be provided, through the pre-application engagement process, to detail; • Survey work to be undertaken, including the methodology used, • Baseline data sets being used to inform assessment, • Methods to be used to quantify the actual level of disturbance, • Guidance to be followed to draw conclusions, for example, where SNCB guidance may be followed would provide a very clear route to understand levels of disturbance.	A comprehensive review of existing data and literature produced for surrounding infrastructure projects such as Offshore Wind Farms (OWF) has been undertaken in the PEIR Chapter to identify other important ornithological features that are not qualifying features of relevant designated sites. These species include those of principle importance. **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** of the ES, details how baseline data have been compiled, through both a desk study and carrying out ornithology surveys at both landfall sites.
Counts taken greater than two hours either side of the tide to not appear to be congruous with WeBS methodology. We would welcome discussion as to the repeats required for data to be considered representative of the site. 3.3.4.3. within Part 3 Onshore Scheme states that a modified WeBS methodology is to be used. We would welcome clarity as to what these methods entail including	The bird survey reports and methodologies for the Proposed Project have been shared with Natural England prior to DCO submission.

Natural England Comment	National Grid's Response
statements to detail how much of the buffer has been surveyed. Suggest clarifications and agreements on survey methodology through the pre-application engagement process.	
It is stated that 'Further intertidal and breeding bird surveys have been proposed for the Suffolk and Kent Onshore Schemes. Any data collected during these surveys will be used to inform the marine ornithology chapter of the EIA, where appropriate' it is not clear exactly what this sentence means.' Suggest clarification is provided through the pre-application engagement process regarding how this survey information is used within the assessments.	Bird data in the intertidal and marine zones has been utilised in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 2 Chapter 2 Kent Chapter 2 Ecology and Biodiversity** or (with regard to red throated diver for example) in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** as appropriate.
Sources and impacts do not scope in the potential for significant effect during the operational phase, such as ongoing effect of habitat loss during operation, or impacts of cable repair and maintenance. This is however screened in during Step 2. The two should agree with each other. Natural England welcomes the screening in of operation and maintenance impacts. Suggest amendment for consistency to clearly scope in operation and maintenance impacts.	Impacts from construction, operation and maintenance and decommissioning have been included in the marine ornithological assessment in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** of the ES.
It is unclear why some sites are labelled, and some are not. For example, Thanet Coast and Sandwich Bay Ramsar is not. Natural England would welcome the inclusion of labels for all sites or a mechanism to explain the visualisation. Suggest all sites are labelled or rationale for labelling is provided in future reports and assessments.	Noted, no further comment required.
Natural England and JNCC have written useful guidance on tiers for scoping projects into cumulative/in-combination assessments. Please see Parker et al. (2022c). Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. Natural England. Version 1.2, 140pp, while this document is intended to be guidance for the development of offshore wind farms, the sections related to cable installation in the marine environment are of relevance to this application.	Thank you for the additional Parker et al. (2022c) guidance resource. This guidance has been reviewed taken into consideration where required. However, for a consistent approach across all schemes, we have followed the guidance from the planning inspectorate provided in Advice Note 17. Therefore, the tier system provided in AN17 has been adopted in the inter-project cumulative effects assessment.
We note that the cable route passes through and near a number of protected areas. In line with the mitigation hierarchy, we would advise that the first option should be for the proposed cable route to avoid protected areas.	The evolution of the Offshore Scheme is presented in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**. This provides a background to the routing for the Proposed Project.
Whilst we note that sediment contaminants may be an issue for consideration within physical environment EIA studies, we consider that water quality parameters are outside of the scope of this topic. We advise that water quality would be better placed in its own section rather than included with physical environment.	Leaks and spills from vessels during all phases have not been included in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** as agreed with the Planning Inspectorate. However, mitigation is presented within Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice and assessed in detail within **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**
With the current consultation on Marine Net Gain in mind, are there any environmental opportunities, such as nature recovery or biodiversity net gain (BNG), as part of the project? We advise that Marine Net Gain and environmental opportunities such as nature recovery or BNG could be considered as part of the project in order to provide a positive environmental outcome.	Net Gain for the Proposed Project is outlined in **Application Document 6.12 Biodiversity Net Gain Feasibility Report.** However, please note that specific marine environmental net gain is not proposed as part of the Proposed Project
Appendix B - Detailed Comments – 4.11 Cumulative Impacts	

Natural England Comment	National Grid's Response
The key environmental impacts due to the Sea Link cable installation, operation, and decommissioning have not been listed here. The key environmental impacts due to the Sea Link cable installation, operation and decommissioning should be included in the assessment of cumulative effects, along with overlapping plans/projects and the receptors impacted.	Noted, A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies**. The inter-project assessments can be found within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
Natural England do not agree with the proposed approach to cumulative impact assessments (CIA) for marine mammals. As stated in IAMMWG (2021), "The MUs therefore provide an indication of the spatial scales at which impacts of plans and projects alone, cumulatively and in-combination need to be assessed for the key cetacean species in UK waters." Further discussion is needed between Natural England and the Applicant on the appropriate approach to CIA for future reports and assessments. In these discussions the Applicant should outline the impact pathways they propose to screen into the CIA.	Inter-Agency Marine Mammal Working Group (IAMMWG) / Special Committee on Seals (SCOS) Marine Management Units have been used as Study Areas the CIA for the offshore Scheme. Feedback from all consultation, including Statutory Consultees, and our responses, are provided within **Application Document 5.1 Consultation Report.** For further details relating to the cumulative impact assessment, please refer to **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
The Applicant should consider whether they will need an European Protected Species (EPS) licence to injure and/or disturb EPS species (cetaceans) from the project activities. Guidance on how to determine the need for an EPS licence can be found here Consider the need for an EPS licence	Noted, no further response required.
Appendix B - Detailed Comments – 5.3 Project Wide Impacts	
It is stated that for Landscape elements and Seascape character 'there is no potential impact for the onshore and offshore schemes to result in a combined effect beyond those already proposed to be assessed in the individual chapters as no theoretical pathway exists.' We disagree with this statement as there is likely to be an impact on Landscape elements of Suffolk Coasts and Heath AONB, and Seascape character from both the onshore and offshore schemes combined effects with other development projects. The Suffolk onshore scheme interacts with other large-scale developments within the AONB, such as Sizewell C, which cumulatively threaten the statutory role of the AONB.	The Landscape and Visual Impact Assessment, set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual,** includes an assessment on both relevant landscape and seascape receptors for all parts of the Suffolk Onshore Scheme (as set out within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**). An assessment of cumulative effects is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Appendix B - Detailed Comments – Volume 2 – Appendices	
There is no mention of lighting within the Code of Construction Practice in regard to protected species and habitats. Mitigation measures to be taken to manage light disturbance from artificial light during construction and operation and should be in accordance with Bats and Lighting in the UK guidance (Bat Conservation Trust and Institute of Lighting Engineers, 2018), to include the use directional beams, facing downwards, non-reflective surfaces and barriers and screens, to avoid lighting impacts.	Light pollution have been considered in the assessments. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 2 Chapter 2 Kent Chapter 2 Ecology and Biodiversity** for further detail.

Natural England Comment	National Grid's Response
Further guidance for mitigation with regards to soils is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites. Defra's guidance on the sustainable use off soils to be followed (Department for Environment, Food and Rural Affairs (Defra) (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites). We will continue to engage with the applicant through the pre-application phase to provide further advice.	Noted - the Defra code is in the process of being updated. The update should have been released last year but is still awaited. If published in time we will review and ensure the mitigation is in line with the revised version.
A table of management measures to reduce impacts on the environment from the project Natural England welcome the consideration of measures which could reduce pathways of impact, such as the control of Invasive Non-Native Species (INNS). We would like to refer the Applicant to www.nonnativespecies.org/what-can-i-do/check-clean-dry/ for guidance for best practice INNS control. We encourage the Applicant to engage with us early within the design stage to ensure the appropriate control and management measures for the project are implemented.	Noted, no further response required.
Appendix B - Detailed Comments – Annex C Net Gain	
Natural England advise that it is imperative that the project as a whole avoids, mitigates and/or compensates for impacts on habitats and species of high biodiversity value including designated sites, protected species and ancient woodland. As a first principle, the project should therefore represent no 'biodiversity net loss' in these regards.	Noted. This has been adhered to as far as possible. Where impacts cannot be avoided they will be mitigated and if they cannot be mitigated compensation will be agreed
However, it should be noted that a significant amount of other valuable and sensitive habitats and species are likely to be affected by the project, including priority habitats and species, County Wildlife Sites and Local Nature Reserves. Priority habitats and species listed under section 41 of the Nature Environment and Rural Communities (NERC) Act are, in the Secretary of State's opinion, of principal national importance for the purpose of conserving biodiversity. The avoidance-mitigation compensation hierarchy should also be clearly followed with respect to these habitats and species where they may be affected by this application.	Noted. Impacts on all these are considered in the ES. For further details, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity and Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity.**
In this regard, Natural England advises that a project of this scale has the potential to provide a positive environmental legacy for the area within which it is proposed, with considerable long-term benefits to people and wildlife. We welcome your commitment to providing Biodiversity Net Gain (BNG) in advance of it being a statutory requirement in the relevant National Policy Statements (NPS EN-1 and NPS EN-5) for Nationally Significant Infrastructure Projects (NSIPs) and we would be keen to work with the applicant in order to help realise any such ambition.	The Proposed Project intends to provide 10% BNG in both Suffolk and Kent. For further details please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**
As you are aware, the BNG approach has been developed to not only help halt declines in wildlife by conserving what habitats and species are left but begin the task of restoring some of what has been lost. In simple terms, BNG calculations should (ideally using the recently released Defra biodiversity net gain metric 3.0) compare the current biodiversity value of the habitats within the project red line boundary to be lost (excluding designated sites and ancient woodland) with the biodiversity value of the habitats forecast to be created following development, with the intention being to demonstrate an overall increase in biodiversity (minimum 10 %). We consider that such an approach could, following completion of the project, provide significant benefits through: • Enabling wildlife to adapt to the challenges of the future including habitat fragmentation, climate change etc.; • Providing a wealth of natural capital benefits such as flood prevention, improved air quality, improved soils, clean water etc.; • Providing inspiration and enjoyment for people through regular access to a high-quality natural environment, improving community health and wellbeing (both mental and physical). This should include	Noted, no further response required.

Natural England Comment	National Grid's Response
enhancement of public access where practical (i.e. where it would not compromise the biodiversity interest, for example) and could also involve local stewardship of any new habitat creation;	
We advise that this such an approach would be in line with: • The Environment Act 2021, NSIPS granted development consent in England will have to deliver at least 10% BNG from an as yet unconfirmed date, expected to be in November 2023. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years. This sits alongside a strengthened legal duty for public bodies to conserve and enhance biodiversity. The construction industry research and information association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA) have launched Biodiversity Net Gain Best Practice guidance to which Natural England provided input to and further best practice guidance is also now available. Many major infrastructure projects in the UK have now committed to delivering a biodiversity net gain and some examples of these are included in this guidance	Noted, no further response required.
The NPS for Energy (NPS EN – 1): this provides the primary basis for decisions on applications for development consent for energy projects and acknowledges that development proposals "provide many opportunities for building-in beneficial biodiversity or geological features as part of good design" (EN-1, para 5.3.15, pg. 72) and that "the applicant should demonstrate that…opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals" (EN-1, para 5.3.18, pg. 72, also see para 5.3.4 on pg. 69).	The Proposed Project intends to provide 10% BNG in both Suffolk and Kent. For further details please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**
The upcoming revisions to the NPSs: The government response to the revised NPS consultation in relation to net gain states that "the 2011 Natural Environment white paper[1] set out an ambition to achieve net gain for biodiversity as opposed to net loss. The recently published 25 Year Environment Plan identified actions to both strengthen the commitment to biodiversity net gain and expand the approach over time to natural capital net gain and ultimately wider environmental net gains as appropriate metrics become available. The NPS will establish the need to consider the potential to achieve biodiversity net gain and will set the context for achieving this at a strategic level without analysis of impacts on individual sites. More detailed assessment, for example based on the Defra biodiversity metric, will be undertaken as part of the DCO application". We hope that the above is therefore useful in giving you some foresight on what the NPS revisions might include in terms of net gain requirements.	The Proposed Project intends to provide 10% BNG in both Suffolk and Kent. For further details please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**
The Government's 25 Year Environment Plan sets out the aspiration to mainstream BNG in the planning system and move towards approaches that integrate natural capital benefits.	Noted, no further response required.
The revised National Planning Policy Framework (NPPF): The NPPF identifies that one of the three overarching objectives to achieving sustainable development through the planning system is an environmental objective "to protect and enhance our natural…environment; including making effective use of land, improving biodiversity…". The revised NPPF was published on 20 July 2021 and updated Planning Practice Guidance (PPG) has also been issued by the Ministry of Housing, Communities and Local Government (MHCLG) to support various aspects of the revisions. Which includes policies to protect and enhance the natural environment, importantly including policies on biodiversity and wider environmental net gain; specifically, planning policies and decisions should contribute to and enhance the natural and local environment by providing net gains for biodiversity and are to identify and pursue opportunities for biodiversity net gain (paras 174,179 and 180) and wider environmental gain (paras 100, 120, 180). Delivering net gain is also referred to in the National Infrastructure Commission's Design Principles and the National design guide.	Noted, no further response required.

1.25 Network Rail

Table 1.24 Network Rail

Network Rail Comment	National Grid's Response
Context	
Network Rail is the statutory undertaker with responsibility for railway infrastructure in England, Scotland and Wales. Therefore, this letter is an operational-led response as statutory undertaker, which focuses on Network Rail's core duties for operation of the rail network, renewal and replacement of the rail network, and the improvement, enhancement and development of the rail network, in all cases in accordance with best practice and in a timely, efficient and economical manner. Network Rail's licence from the Secretary of State can be found here: - https://www.orr.gov.uk/sites/default/files/om/netwrk_licence.pdf	Noted, no further response required.
Therefore, Network Rail aims to protect and improve the safety and the maintaining of the railway, including railway and railway related uses (such as freight, depot and infrastructure uses) at present and for future uses.	Noted, no further response required.
Level Crossing Usage	
Within The Suffolk and Kent areas, there's potential for construction traffic from the proposed development to impact several Level Crossings, both public and private. To mitigate impacts the developer must consider the following; i. A safe working method should be agreed upon through Network Rail's Asset Protection Team (ASPRO) before the use of the private crossings. ii. The Public road crossings must be used in accordance with the signs displayed. Upon Request, Network Rail can provide a list of the relevant crossings.	Noted, no further response required.
Easements and Wayleaves	
Agreements for cables to pass over or under the railway need to be obtained from the Easements and Wayleaves team, with works supervised by the Asset Protection Team.	Noted, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for details of railway crossings. For specific reference to the locations where the Proposed Project crosses railways please refer to **Application Document 6.3.1.4.A Appendix 1.4.A Crossings Schedules.**
Asset Protection Supporting Information;	
Asset Protection (ASPRO) maintain the railway infrastructure and strongly recommend that for any development, near the railway, the developer(s) contacts Network Rail's ASPRO team via AssetProtectionAnglia@networkrail.co.uk at an early stage and prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works.	Noted, no further response required.
ASPRO manage and mitigate numerous risks to and from the railway to ensure that proposed development(s) do not have an adverse impact on Network Rail's operational railway infrastructure.	Noted, no further response required.
For further information on Asset Protection, please see the Network Rail's ASPRO website below; • https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/assetprotection-and-optimisation/	Noted, no further response required.
Conclusion	

Network Rail Comment	National Grid's Response
Network Rail have provided key considerations within the earlier sub-sections; • Part A: Level Crossing – Network Rail Requirements • Part B: Asset Protection (ASPRO).	Noted, no further response required.
Network Rail will continue to work with National Grid Electricity Transmission plc and would welcome any further discussion on this consultation response, as well as future correspondence and meetings.	Noted, no further response required.

1.26 Office for Nuclear Regulation

Table 1.25 Office for Nuclear Regulation

Office for Nuclear Regulation Comment	National Grid's Response
Parts of the Suffolk Onshore Scheme are located in the Detailed Emergency Planning Zone (an ONR consultation zone) of the Sizewell B nuclear licensed site;	Noted, no further response required.
Parts of the Suffolk Onshore Scheme are located in ONR's Outer Consultation Zone (an ONR consultation zone) of the Sizewell A and Sizewell B nuclear licensed sites;	Noted, no further response required.
The applicant should take due cognizance of the Sizewell A and Sizewell B nuclear licensed sites, operated by Magnox Ltd and EDF Energy Nuclear Generation Ltd respectively;	Noted, National Grid is aware of these nuclear licensed sites. Sizewell B Power Station was flagged as a COMAH Lower Tier Operator located within 3km of the Proposed Project in the consideration of major accidents and disasters within the EIA Scoping Report. An assessment of Major Accidents and Disasters was scoped out of the EIA on the basis that significant environmental effects were unlikely with processes and standards in place and given the Proposed Project is unlikely to generate any significant effects on the environment if a major accident or disaster were to occur (see Volume 1 Part 5 Project Wide Effects in the EIA Scoping Report). As noted in Appendix 5.2.A of the EIA Scoping Report, the Proposed Project would not lead to any increased risk of a major accident or disaster from a nuclear site. Since the submission of the EIA Scoping Report, the design for the Proposed Project has developed and the Order Limits have changed such that they are no longer in close proximity to Sizewell A or Sizewell B. See **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for further details. National Grid will engage with other businesses and developers operating in the area and will seek to engage with the local emergency services in order to discuss and understand any matters of concern, including any relating to emergency planning.
The applicant should liaise with Magnox Ltd and EDF Energy Nuclear Generation Ltd in relation to the potential external hazards the proposed development poses to Sizewell A and Sizewell B respectively (and vice versa); and	Noted, National Grid is aware of these nuclear licensed sites. Sizewell B Power Station was flagged as a COMAH Lower Tier Operator located within 3km of the Proposed Project in the consideration of major accidents and disasters within the EIA Scoping Report. An assessment of Major Accidents and Disasters was scoped out of the EIA on the basis that significant environmental effects were unlikely with processes and standards in place and given the Proposed Project is unlikely to generate any significant effects on the environment if a major accident or disaster were to occur (see Volume 1 Part 5 Project Wide Effects in the EIA Scoping Report). As noted in Appendix 5.2.A of the EIA Scoping Report, the Proposed Project would not lead to any increased risk of a major accident or disaster from a nuclear site. Since the submission of the EIA Scoping Report, the design for the Proposed Project has developed and the Order Limits have changed such that they are no longer in close proximity to Sizewell A or Sizewell B. See **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for further details. National Grid will engage with other businesses and developers operating in the area and will seek to engage with the local emergency services in order to discuss and understand any matters of concern, including any relating to emergency planning.

Office for Nuclear Regulation Comment	National Grid's Response
The applicant should liaise with Suffolk County Council in relation to the whether the proposed development can be accommodated in the Off-Site Emergency Plan for Sizewell B.	Noted, National Grid is aware of these nuclear licensed sites. Sizewell B Power Station was flagged as a COMAH Lower Tier Operator located within 3km of the Proposed Project in the consideration of major accidents and disasters within the EIA Scoping Report. An assessment of Major Accidents and Disasters was scoped out of the EIA on the basis that significant environmental effects were unlikely with processes and standards in place and given the Proposed Project is unlikely to generate any significant effects on the environment if a major accident or disaster were to occur (see Volume 1 Part 5 Project Wide Effects in the EIA Scoping Report). As noted in Appendix 5.2.A of the EIA Scoping Report, the Proposed Project would not lead to any increased risk of a major accident or disaster from a nuclear site. Since the submission of the EIA Scoping Report, the design for the Proposed Project has developed and the Order Limits have changed such that they are no longer in close proximity to Sizewell A or Sizewell B. See **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for further details. National Grid will engage with other businesses and developers operating in the area and will seek to engage with the local emergency services in order to discuss and understand any matters of concern, including any relating to emergency planning.

1.27 Royal Mail

Table 1.26 Royal Mail

Royal Mail Comment	National Grid's Response
Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.	Noted, no further response required.
Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.	Noted, no further response required.
The Government imposes financial penalties on Royal Mail if its Universal Service Obligation service delivery targets are not met. These penalties relate to time targets for: · collections, · clearance through plant, and · delivery.	Noted, no further response required.
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network	Noted, no further response required.
Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business	Noted, assessment of likely increases in traffic during construction of Sea Link (including with respect to driver delay) are provided in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**. Details relating to any temporary traffic management or highway improvements are set out within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** and **Application Document 7.5.1.2 Construction Traffic Management and Travel Plan - Kent.** A detailed assessment of the potential for cumulative impacts with SCZ is included within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Royal Mail position	
Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Environmental Impact Assessment Scoping Report ("Scoping Report"), published October 2022	Noted, no further response required.
Royal Mail has 5 operational properties within 5 miles of the proposed works: Suffolk Onshore · BE 1632 Saxmundham DO/RET/PAR, 48 High Street, Saxmundham, IP17 1AA (c. 0.5 miles) · BE 1627 Leiston Delivery Office, 14 Sizewell Road, Leiston, IP16 4AA (c. 0.5 miles)	Noted, no further response required.
Kent Onshore · BE 1430 Sandwich DO, 34 King Street, Sandwich, CT13 9AA (c. 0.5 miles) · BE 1426 Ramsgate DO, 42 Wilfred Road, Ramsgate, CT11 7RA (c. 1.5 miles) · BE 1407 Broadstairs DO, 20 The Broadway, Broadstairs, CT10 2AA (c. 3.5 miles)	Noted, no further response required.
An outline Construction Traffic Management Plan ("CTMP") will be prepared and submitted as part of the DCO application. Due to this early stage, there are currently no details of proposed mitigations.	Noted, no further response required.
The published ES Report states the following elements have been outlined as potential sources of traffic impact during the construction phase, particular regarding Suffolk Onshore and Kent Onshore: · Construction works e.g. where these require temporary traffic management, or result in temporary	Noted, no further response required.

Royal Mail Comment	National Grid's Response
diversions or closures to the highway network or pedestrian/cycle routes including PRoW; · Construction routes e.g. where these interact with the existing transport networks (road/rail/pedestrian/cycle) such as at vehicle crossing points; and · Construction vehicles: o HGVs; o LGVs; o Construction staff vehicles; and o Abnormal loads	
Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed Sea Link.	Noted, no further response required. Please refer to **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** for full details of the assessment on the highway network.
Any periods of road disruption / closure, night or day, on or to the roads immediately connected to the Sea Link or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.	Noted, no further response required.
Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	Noted, no further response required.
Royal Mail does not wish to stop or delay Sea Link and its works from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public from and to the above identified operational facilities in accordance with its statutory obligations. Whilst the nature of the scheme itself (electric lines) is considered to have low potential of impacting Royal Mail assets or operations during its construction and operational phase, parts of the construction phase may impact Royal Mail. Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s later in the DCO consenting process when sufficient information is available. Royal Mail also wishes to reserve its position to submit representations to the future Public Examination, if required	Noted, no further response required.

1.28 South Norfolk Council

Table 1.27 South Norfolk Council

South Norfolk Council Comment	National Grid's Response
I can confirm that South Norfolk Council has no comments to make and we would wish to defer to the Host Local Authorities for their views and comments to be taken into consideration.	Noted, no further response required.

1.29 Suffolk and North East Essex Integrated Care Board

Table 1.28 Suffolk and North East Essex Integrated Care Board

Suffolk and North East Essex Integrated Care Board Comment	National Grid's Response
Introduction	
This letter is a response by the Suffolk and North East Essex Integrated Care Board (the ICB) to the scoping opinion consultation on the proposed development detailed above. The ICB is responding as the strategic health authority in the location where the development is located.	Noted, no further response required.
Please note that the following comments are a combined response on behalf of Suffolk and North East Essex Integrated Care Board (SNEE) in particular on behalf of the following organisations; East Suffolk & North East Essex Foundation Trust (ESNEFT) Norfolk and Suffolk Foundation Trust (NSFT) East of England Ambulance Service NHS Trust (EEAST) please note EEAST are inputting their own response regarding impact on blue light services.	Noted, no further response required.
The ICB is the commissioner of primary care, secondary care, mental health and emergency and non emergency services in the area of the development and will respond on behalf of all these services as part of our statutory duties. I can confirm that our health economy partners, may from time to time request additional engagement including but not limited to the impact on access to health facilities and emergency service vehicle response times	Noted, no further response required.
It is important to note the ICB works in collaboration with our public health colleagues in Suffolk County Council and endorse the response you will receive from Suffolk County Council in all elements of human health environmental impacts.	Noted, no further response required.
Development impacts on Health	
Most large-scale development proposals impact on the ICB's roles and responsibilities in the following areas: o Meeting the healthcare needs of the workforce o Disruption to access/transport for patients (emergency and non-emergency) and staff travelling to and between healthcare sites o Responding to major incidents/disasters These matters should be assessed, and mitigation proposed for the construction and operational phases of the development.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** assesses access to healthcare services with an increased demand. It is concluded that there are no anticipated significant effects.
Cumulative impacts – consideration must be made to other major development proposals in the area and the in-combination impacts. This includes the known developments (but not limited to) of Sizewell C, Bramford to Twinstead national grid upgrade and East Anglia Green national grid upgrade.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies.** The inter-project assessments can be found within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** Sizewell C and Norwich to Tilbury (EAG) have been included in the Suffolk Onshore Scheme CEA. Bramford to Twinstead has not been included in the Suffolk Onshore Scheme CEA as it is situated 32.6 km away from the Suffolk Onshore Scheme Boundary and therefore falls outside the ZOI.

Suffolk and North East Essex Integrated Care Board Comment	National Grid's Response
It is noted that Leiston Surgery is named as a healthcare facility that may be impacted during the onshore construction works. It will be necessary to understand the potential impact and establish appropriate mitigation to ensure any disruption is minimised.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** assesses access to healthcare services. It is concluded that there are no anticipated significant effects.
Meeting the healthcare needs of the workforce It is necessary to consider whether the workforce, construction and when operational the development will add to the burden on local healthcare services and whether these services have the capacity to provide the necessary services. It will therefore be important to ensure the following Information is provided; • size of non- permanent workforce • timing and duration of their stay • location during stay in area • healthcare and wellbeing facilities to be provided by developer on-site	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** assesses access to healthcare services with an increased demand. It is concluded that there are no anticipated significant effects. A complete assessment of socio-economics effects has been undertaken, including an assessment of construction workforce and accommodation capacity. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism** and concludes that there are no anticipated significant effects on construction workforce and accommodation capacity as a result of the Proposed Project. As a result there are no additional mitigation measures proposed.
Conclusion	
In response to the scoping option notification for the development of an Environmental Statement (ES) it is acknowledged that there is reference to the following areas of concern and that further detail should be explored in the development of the ES; • Under the proposed approach to the Environmental Impact Assessment on travel impact, there is a high level understanding of how the review of the potential impact of the number of HGV's will be undertaken and acknowledges that the impact will be felt on the A12 and minor A roads as part of the onshore construction phase. • The report also acknowledges the cumulative effect of multiple schemes . This is an important area which we would like to be part of the exploration of reducing the impact by working in partnership • We are particularly interested in understanding more around the opportunities to work with the developer on turning the potential impacts on Socio Economics, Tourism and Recreation into opportunities to improve the offer of local skills, education, training and jobs for local people. • We are keen to ensure that the EIA provides further detail to the acknowledgement in the scoping options report to the potential demand on healthcare services during the construction period including Primary Care with influx of additional temporary residents.	Noted, the forecast traffic flows within Suffolk including the complete impact assessment are set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport**, which details the residual effects to local road networks. National Grid agree that the assessment of inter-project cumulative effects is an important aspect, and therefore a full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** An assessment of access to healthcare services for Suffolk is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing.** The impact on the economy, PRoW's and private, community, recreation and tourism assets is considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**

1.30 Suffolk County Council

Table 1.29 Suffolk County Council

Suffolk County Council Comment	National Grid's Response
1 Summary of Response	
This document is Suffolk County Council's (SCC) response to The Planning Inspectorate's request in the letter dated 25 October 2022 for comments to inform the adoption of an Environmental Impact Assessment (EIA) Scoping Opinion by the Planning Inspectorate regarding the National Grid Electricity Transmission's (NGET) proposals for a 140km subsea grid reinforcement link between Suffolk and Kent, known as Sea Link, including on shore infrastructure.	Noted, no further response required.
This response contains the technical comments of staff directly employed by SCC specifically on the question of the adoption of an EIA Scoping Opinion and is not intended to make comments on the merits of the Sea Link proposal itself, which will be dealt with separately under the Non-Statutory Consultation by NGET which has run concurrently with the request for an EIA Scoping Opinion.	Noted, no further response required.
2 Contents of this Response	
The Response comprises this section as a summary and the accompanying Appendix A. The summary begins with some general comments on NGET's approach to scoping for its Sea Link project. The remainder of this summary sets out the main elements of the technical views of staff employed directly by SCC.	Noted, no further response required.
Appendix A provides the technical comments in full all of which should be considered as an integral part of SCC's substantive comments.	Noted, no further response required.
3 General Comments	
SCC has concerns about the approach taken in NGET's Scoping Report to the issue of scoping out environmental matters, to the proposed assessment of the significance of effects, and to the proposed assessment of cumulative impacts. These concerns apply generally across the environmental topics and so are set out here. The comments on the individual environmental topics should be read in the light of these general concerns.	Noted, concerns raised are responded to further below.
The Main Text of the Scoping Report (in Volume 1) explains the approach and method adopted in section 1.5. Paragraph 1.5.3.4 discusses the technical scope of assessment for each environmental aspect but leaves the detail of all matters which have been scoped out to be found only in the specific technical chapters. There is no general explanation of the approach to what has been scoped out and no simple presentation of all matters which have been scoped out.	Noted, this comment was made following submission of the EIA Scoping Report, since this time, statutory and targeted consultation has taken place which has clarified the scope of the EIA. Please refer to the technical environmental assessment chapters within the ES which provide complete assessments for the Suffolk, Kent and marine aspects of the Proposed Project. The structure of the ES and supporting documents is outlined in **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction.**
Nor do the technical chapters present the information on what has been scoped out in a clear, consistent, or coherent manner. For example, it is unclear whether decisions to scope out impacts have been determined with or without the provision of mitigation in all cases (for example, in Table 2.3.3 in Volume 2 no account is taken of mitigation in the decision to scope in pollution impacts from construction of the converter station but in Table 2.6.2 reliance is placed on mitigation by design to scope out contaminants to the environment from construction activities).	This comment was made following submission of the EIA Scoping Report, since this time, statutory and targeted consultation has taken place which has clarified the scope of the EIA. Please refer to the technical environmental assessment chapters within the ES which provide complete assessments for the Suffolk, Kent and marine aspects of the Proposed Project. The structure of the ES and supporting documents is outlined in **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction.**
In addition, where mitigation has been assumed to be in place, the justification for scoping out all such impacts is not provided, especially where mitigation would be bespoke to the project.	This comment was made following submission of the EIA Scoping Report. The EIA has been undertaken in accordance with the Scoping Opinion provided by the Planning Inspectorate and also informed by the results of statutory and targeted consultation and thematic meetings undertaken

Suffolk County Council Comment	National Grid's Response
	since. Please refer to the technical environmental assessment chapters within the ES which provide complete assessments for the Suffolk, Kent and Offshore Scheme aspects of the Proposed Project. The structure of the ES and supporting documents is outlined in **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction.** Environmental impacts were only scoped out of topic assessments within the EIA Scoping Report where it was considered that there was not likely to be any significant environmental effects. Mitigation was taken into account in this decision, if it could be relied upon at the point of time of EIA Scoping, i.e. already embedded in the Proposed Project design or standard best practice measures.
The matters scoped out also appear to include reliance on a judgment that there is "less potential" for a significant effect (for example in Tables 2.2.6 and 2.2.7 in Volume 2) but the meaning of this term is unclear as is the basis for the judgment. SCC would expect there to be a clear, consistent, and coherent explanation of all decisions to scope out impacts.	The assessment of landscape and visual effects on the AONB and other landscape and visual receptors from the Suffolk Onshore Scheme is presented in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** Where receptors have been scoped out these are clearly identified with a corresponding rationale.
Section 1.5 also explains the approach to the assessment of significance. This includes the magnitude of the impact and Table 1.5.1 sets out the magnitude criteria. The largest magnitude impact is described as "Large" and the smallest as "Negligible." However, individual technical chapters use different magnitude criteria. For example, Chapter 2.2 (Landscape and Visual) has magnitude criteria of "Very Large" and "None" as well as "Large" and "Negligible." Chapter 2.5 (Water Environment) has magnitude criteria of "Large Adverse," "Negligible," "Small beneficial," and "No change." SCC would expect there to be a clear, consistent, and coherent explanation of the magnitude criteria used and a justification for any differences between technical chapters.	The standard approach and methodology for assessing potential significant environmental effects is outlined within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**. However, in the instance where a technical chapter deviates from the methodology outlined within Chapter 3, the technical chapter include an upfront statement as to where they have deviated from the methodology and why.
Section 1.5.5 explains the approach to cumulative effects and distinguishes between intra-project effects (interaction of different aspects of the project on each other) and inter-project effects (interaction of the project with other projects). However, it does not appear that inter-project effects are to be considered in Part 5 on Project Wide Effects, so that there would be any assessment of inter-projects effects on climate change and major accidents/disasters. SCC would expect there to be a clear justification for a decision to exclude such effects from the assessment of cumulative effects.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** The consideration of Intra-project cumulative effects has also been assessed a where shared receptors between various technical environmental assessments have been identified. For further details please refer to **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects.** Climate change is the result of cumulative impacts as it is the result of innumerable minor activities. A single activity may itself result in a minor or insignificant impact, but when combined with many other activities, the cumulative impact could be significant. 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. For further information please refer to **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change.**

Suffolk County Council Comment	National Grid's Response
	As stated with the EIA Scoping Report and subsequently agreed with the Planning Inspectorate via the EIA Scoping Opinion, Major accidents and disasters has been scoped of out of the EIA. Therefore this has also been scoped out of the cumulative effects assessments as there is no potential for significant cumulative effects associated with major accidents or disaster to occur.
In addition, there are discrepancies in the information presented as to which other projects will be progressed to Stage 2 of the Cumulative Effects assessment. For example, Table 1.5.A.1 in Appendix 1.5.A suggests that projects 2 (NeuConnect), 3 (GridLink), 4 (North Falls), and 5 (East Anglia One North) will be taken forward to Stage 2 but Table 2.13.3 in Volume 1, Part 2, does not include any of these projects in the projects proposed to be taken forward to Stage 2. There is no explanation for this discrepancy or for the omission of these projects from the intended Cumulative Effects assessment. SCC would expect all projects identified in Table 1.5.A.1 as projects to be assessed in Stage 2 to be so assessed or a clear explanation provided for any omissions.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence and has been carried out in line with the Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. Published September 2024. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Assessment Methodologies.** A full inter-project cumulative effects assessment for the Suffolk Onshore Scheme has been carried out for the Proposed Project and includes consideration of Sizewell C, EA1N & the NG substation, EA2, LionLink and Norwich to Tilbury (EAG). North fall and Five estuaries have not been included in the Suffolk cumulative effects assessment as their onshore elements are outside the ZOI for the Suffolk onshore scheme. A full inter-project cumulative effects assessment for the Offshore Scheme has been carried out for the Proposed Project and includes consideration of Sizewell C, EA1N, EA2, Nautilus, North Falls, LionLink (previously EuroLink) and Five Estuaries.
SCC also has concerns that the threshold used for the proposed assessment of cumulative effects is not sufficient or adequately justified. It is suggested at paragraph 2.13.3.5 of Volume 1, Part 2, of the Scoping Report that a Zone of Influence (ZOI) of 20km from the Suffolk Onshore Scheme Scoping Boundary has been used to identify a long list of other projects. It appears from Table 2.13.2 that this is based on the largest study area of 10km (for Ecology and Biodiversity) and an assumption that "due to the proximity of the strategic road network" the construction traffic routes for assessment would not extend beyond 10km. However, it appears from various references in the Scoping Report (as detailed further below in the technical comments in section 16 of Appendix A), that it has been wrongly assumed that the A12 between the A14 Seven Hills interchange and the A47 Bascule Bridge at Lowestoft is a trunk road and so part of the strategic road network. This is not the case. The strategic road network is remote from the proposed construction sites for the project and therefore the effects of construction traffic on the local road network (which is the responsibility of SCC) will extend much further than the 10km assumed in the Scoping Report.	During Scoping an overall cumulative assessment ZOI of 20 km was proposed. This was based upon the largest topic study area, ecology and biodiversity being identified as 10 km, therefore a ZOI of 20 km from the Suffolk Onshore Scheme was established to identify the initial long list of other developments. This ZOI has been backchecked as part of this ES to take account of any changes in the proposed study areas since scoping and PEIR. The rationale for study areas are explained in relevant the technical chapters in Part 2, Part 3 and Part 4. These study areas were presented during Scoping and discussed with stakeholders prior to Statutory Consultation. Where appropriate the study areas were checked and refined at PEIR following the thematic meetings. The consideration of cumulative effects as a result of committed developments is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** based on **Application Document 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments**, which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The traffic and transport cumulative assessment includes the A12 to the south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes.
In addition, it is suggested at paragraph 2.11.3.3 of Volume 1, Part 2, of the Scoping Report that employment effects are only to be considered within the local authority area of East Suffolk. However, SCC considers that, due to the large number of energy and other infrastructure projects that are being and/or are planned to be constructed in Suffolk in the remainder of the current decade	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 6: Study Area sets out that employment generation during the construction phase will be assessed within a 60 minute travel area, based on research by the Chartered Institute of Personnel and Development (CIPD). **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13**

Suffolk County Council Comment	National Grid's Response
(and beyond in some cases, such as Sizewell C), there is a need to consider employment effects over a more extensive area. SCC expects to see an evidence-based approach to the selection of a study area for employment effects.	**Suffolk Onshore Scheme Inter Project Cumulative Effects** details the cumulative socio-economics impact of the Proposed Project in combination with other local schemes.
In conjunction, these concerns on the proposed study areas for both construction traffic and employment lead SCC to conclude that the study area for the assessment of cumulative effects is inadequately justified and that it is likely that a greater number of other projects within Suffolk will need to be included (potentially including the Sunnica Energy Farm between Newmarket and Mildenhall).	The consideration of cumulative effects as a result of committed developments is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** based on **Application Document 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments,** which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The traffic and transport cumulative assessment has been carried out based on the agreed study area and receptors assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport,** which includes the A12 to the north and south of the study area.
4 Archaeology	
In reviewing the Scoping Report, SCC Archaeology have identified the following issues: - • Further refinement of siting/routing methodology should include a search of the Historic Environment Record (HER)/desk-based assessment and should consider the impact of the proposed development on designated and non designated heritage sites and sites of archaeological potential.	Noted. A search of the HER and Designated Assets has been undertaken and impacts on assets are assessed within **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** where there is the potential for impacts.
Assessments need to consider results from other schemes which have been proposed in the area which may overlap the Sea Link project, for example, potentially Sizewell C, Galloper and Greater Gabbard and East Anglia One North and Two.	Noted, a cumulative effects assessment has been carried out and is presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Schme Inter-Project Cumulative Effects.**
Further assessment is required to fully characterise the heritage resource and fully understand the impacts of development upon above and below ground heritage assets.	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in **Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report,** and are provided in full within **Application Documents 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E and 6.3.2.3.F.** All survey works were undertaken in accordance with Written Scheme of Investigations (WSIs) approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the cultural heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
All onshore elements (e.g. landfall sites, converter station sites, cable corridors, haul roads etc) should be scoped for archaeological assessment as all have potential to damage or destroy surviving archaeological remains.	Noted. These elements are all covered as part of the assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and A**pplication Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.**
Table 2.41 – Decommissioning work needs to be recognised within the scoping as having potential to damage or destroy surviving archaeological remains.	Noted. These elements are all covered as part of the assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage.**
The potential for remains which have been preserved in situ and needs to be protected from disturbance by all phases of works appears to have overlooked.	Where possible, heritage assets will be preserved in situ, with protection agreed with heritage stakeholders. Where preservation in situ is not possible, mitigation will be agreed with the heritage stakeholders.
Thorough desk top assessment and field evaluation is required to consider archaeological potential of sites and likely impacts of development.	Noted. This data gathering and assessment was started within the PEIR and has been further developed as presented within Environmental Statement.

Suffolk County Council Comment	National Grid's Response
	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E and 6.3.2.3.F.** All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
A settings impact assessment for above ground heritage should be undertaken and impacts on historic hedgerows, boundaries and other historic elements should also be considered through use of historic mapping and Historic landscape Characterisation.	Noted. This is included in within Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report)**. The information has also been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
A full suite of archaeological assessment (desk-based, geophysical, fieldwalking/metal detection) for all sies impacted by any element of the onshore works should be undertaken prior to/at EIA stage.	Noted. This data gathering and assessment was started within the PEIR and has been further developed as presented within Environmental Statement. A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E** and **6.3.2.3.F**. All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**).
All phases of archaeological investigation must be led by a brief produced by the Suffolk Archaeological Service (SCCAS).	Noted. All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor.
Archaeological and heritage assessments should be programmed into the project at the earliest opportunity to allow evaluations to be undertaken early to prevent possible delays to the development schedule.	Noted. Extensive evaluation trenching has been undertaken at an early stage and further works will be agreed and undertaken once the DCO has been submitted.
5 Ecology	
• The Applicant states: "…only statutory designated sites up to 2km from the Suffolk Onshore Scheme Scoping Boundary have been shown but this will be updated and expanded for the Preliminary Environmental Information Report (PEIR)." - To this point, SCC would add that, depending on routes for HGVs, workers, materials and so on, other sites enroute may also be affected. This should be taken into account when researching and writing the PEIR. Impacts may include visual disturbance, dust, noise, air quality and so on. - Although it is mentioned elsewhere, non-statutory wildlife sites (in Suffolk these are County Wildlife Sites) are very important elements of nature conservation and full details can be obtained from SBIS (https://www.suffolkbis.org.uk/). - In addition, SBIS can provide the up-to-date lists of Suffolk Priority Species and Habitats. It is important that these are given appropriate consideration and weighting.	Extensive evaluation trenching has been undertaken at an early stage and further works will be agreed and undertaken once the DCO has been submitted.
• Alongside the consultation of inter alia, SBIS and other bodies detailed in paragraph 2.3.4.1 to carry out the desk-top study, SCC considers it important to include ground truthing	Noted. This has been completed.
SCC considers the expected survey requirements detailed in paragraph 2.3.4.3 appropriate.	Noted, no further response required.

Suffolk County Council Comment	National Grid's Response
the Applicant acknowledges parcels of Ancient Woodland but should be made aware that SCC is currently carrying out an Ancient Woodland Inventory which may update the records currently available. The Applicant can obtain updates on the Inventory through SBIS (as and when it is available) or contact the SCC Ecology Team who can provide a point of contact	Noted, National Grid have contacted Suffolk Biological Record Centre to obtain the latest records to inform the DCO application.
SCC welcomes the applicant's pledge of delivering a minimum of 10% Biodiversity Net Gain.	Noted, no further response required.
The applicant acknowledges Invasive Non-Native Species (INNS) but confines comments to plants. Fauna can also be INNS and in East Suffolk this may include Muntjac Deer, Chinese Water Deer, American Mink, and non-native species of Crayfish. These species should also be taken into account.	Noted, **Application Document 6.2.2.2 Part 2 Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity** have considered all invasive species where present, please refer to these chapters for further details.
SCC welcomes the Applicants acknowledgement that: "Due to developmental pressure year on year within the wider landscape, protected and notable species and habitats are likely to remain priorities for conservation within future baseline scenarios." This is explicit acknowledgement that this proposal, in association with the others in a relatively modest geographical area could well prove to have the most serious consequences on Suffolk's wildlife and habitats.	Noted, no further response required.
SCC welcomes the Applicant's proposal to use trenchless techniques where possible although the applicant must consider the extensive ditch and marsh network which covers some of the proposed area.	Noted, the ditch and marsh network has been considered. Please refer to **Application Document 6.2.2.2 Part 2 Chapter 2 Ecology & Biodiversity** for further details. However, it should be noted that HDD requires substantial engineering and can involve a greater area and duration of impact than open trenching. Impacts in this regard have been considered.
SCC considers the applicant's scoping in of potential impacts acceptable, but this must also be informed by survey work.	Noted, no further response required.
6 Economic Development/Socioeconomic	
SCC expects the applicant to consider the cumulative impacts of the proposed development alongside other schemes proposed in the area (e.g. Sizewell C) which will place significant pressure on workforce availability, supply chain demand and tourism. SCC is concerned that the assessment of other schemes seems to be limited to those in East Suffolk (and one scheme in Mid Suffolk) in Table 2.13.3 in Volume 1, Part 2 but SCC has seen no justification for an assumption that the workforce catchment area will be so limited. SCC considers there are other construction projects, particularly in the energy sector, which are planned to take place in Suffolk (potentially including the Sunnica Energy Farm) which could have interactions with the proposed development in relation to workforce availability.	Noted, Cumulative effects of the Proposed Project are considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects.**
It is noted that there is limited information on socioeconomics, particularly the scale of impact and opportunity associated with the workforce. SCC considers that the application should provide more detailed information as part of future submissions.	Detail regarding construction employment generation and the workforce's impact on local accommodation capacity, social infrastructure and GVA is included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism** Section 9: Assessment of Impacts and Likely Significant Effects.
SCC disagrees with the method used in paragraph 2.8.16 which sets out the use of a 'simple gravity model' for workforce origins. There is significant risk in this approach given the large number of infrastructure projects in the area and the availability of the workforce, the origin of the workforce and the related traffic impact. Estimated workforce living in the locality detailed in paragraph 2.11.7.11 will need to be evidenced.	We are confident that our approach and methodology is sufficiently robust and remains consistent across DCO infrastructure projects. A complete cumulative assessment has been undertaken. This is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects.**
Accommodation and community impacts have not been covered in the scoping document and will need to be considered by the applicant to ensure appropriate understanding of potential impacts.	The impact on private, community, recreation and tourism assets, including accommodation capacity, is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**.

Suffolk County Council Comment	National Grid's Response
At this point workforce numbers and phasing are unconfirmed and therefore, any areas that workforce will interact or impact upon cannot be scoped out of the ES as there is not enough information to make an informed decision.	Operational Employment has not been included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The level of employment generation in operation is explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The Assessment of Impacts and Likely Significant Effects included within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** includes the employment and GVA generated by the Suffolk Onshore Scheme during the construction phase.
The applicant will need to consider the impact and opportunities the development may place on the local labour market within the ES. It should set out clearly the expected number and nature of employment opportunities during each phase of the development. It should relate this to the availability of labour in the area and address how any mismatch in supply and demand will be managed.	A complete assessment of socio-economics effects has been undertaken. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section: 9 Assessment of Impacts and Likely Significant Effects includes an assessment of the employment generated by the Suffolk Onshore Scheme during the construction phase. It is concluded that there are no anticipated significant socio-economic effects. Operational Employment has not been included within the Assessment of Impacts and Likely Significant Effects as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The level of employment generation in operation is explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
A large proportion of tourist trips are associated with the natural and historic beauty of the area as a whole. Therefore, it is more relevant to consider the extent to which the impact of construction in the landscape detracts from the environmental quality for recreational activity more broadly and the perception and propensity of people to visit the area.	The impact on private, community, recreation and tourism assets is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**.
SCC notes while the applicant has identified potential impacts (paragraphs 2.11.6.3-2.11.6.7 and table 2.11.3), there is a need to consider these in more granular detail than presented within the Scoping Report. Too many sources of impact have been grouped together and therefore will not correctly assess the impact.	The impacts on the economy, PRoW, and private, community, recreation and tourism assets, including accommodation capacity, are independently considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**
SCC disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, Section 6: Study Area presents the socio-economic, recreation and tourism impacts by geographical scale at which each component is assessed, and the rationale behind these geographical scales. Receptors that fall outside of the study areas will be considered if it is deemed that significant effects are likely.
SCC recognises that when considering the project as a single entity there are minor positive opportunities for economic development, employment, skills, and education. However, SCC expects the applicant to consider all the National Grid projects located within Suffolk and develop an approach that encompasses this project as part of their meta project in the region.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** presents the socio-economic, recreation and tourism impacts and assesses the economic impacts of the Proposed Project. Please note that **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** considers the outcomes of the core assessment for the Proposed Project alone and then assesses the combined impact alongside other proposed developments within the CEA study area to determine any potential significant inter-project cumulative effects.
7 Joint Emergency Planning Unit Comments	
SCC has a statutory duty under Radiation - Emergency Preparedness and Public Information Regulations 2019 (REPPIR) to consider the development with respect to the existing Sizewell Off Site Emergency Plan due to the proposed sites being within 1km of Sizewell B power station	Noted, no further response required.
An emergency plan for the construction would be required which covers protecting construction staff during any Sizewell radiation emergency and ensures the development does not adversely affect	Noted. Sizewell B Power Station was flagged as a COMAH Lower Tier Operator located within 3km of the Proposed Project in the consideration of major accidents and disasters within the EIA Scoping Report. An assessment of Major Accidents and Disasters was scoped out of the EIA on the basis

Suffolk County Council Comment	National Grid's Response
the existing Radiation Emergency Plan which coordinates the response of the emergency services and other agencies in response to an incident at Sizewell B.	that significant environmental effects were unlikely with processes and standards in place and given the Proposed Project is unlikely to generate any significant effects on the environment if a major accident or disaster were to occur (see Volume 1 Part 5 Project Wide Effects in the EIA Scoping Report). As noted in Appendix 5.2.A of the EIA Scoping Report, the Proposed Project would not lead to any increased risk of a major accident or disaster from a nuclear site. Since the submission of the EIA Scoping Report, the design for the Proposed Project has developed and the Order Limits have changed such that they are no longer in close proximity to Sizewell A or Sizewell B. See **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Projec**t for further details. As per **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**, an Incident Response Plan will be developed for the construction phase which will outline procedures that will be implemented in case of unplanned events. National Grid will engage with other businesses and developers operating in the area and will seek to engage with the local emergency services in order to discuss and understand any matters of concern, including any relating to emergency planning. National Grid has engaged extensively with the County Council and is seeking further collaborative engagement with blue light service providers.
8 Lead Local Flood Authority Comments	
SCC will act as Lead Local Flood Authority (LLFA) for the Sea Link proposals.	Noted, no further response required
Receptors are included within the assessment, however, there is no explanation how the receptors were selected and why others were discounted, such as people and property.	As detailed in A**pplication Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**, people and existing property and infrastructure are included where there is potential for the project to affect these receptors.
Noted 'Hydrogeology' sits in a separate chapter to 'Water Environment.' Any assessment of groundwater flood risk should be considered alongside other sources of flood risk.	Noted. Groundwater as a source of flood risk is assessed within the Flood Risk Assessment that accompanies the ES (see **Application Document 6.8 Flood Risk Assessment)**.
Any relevant information from local guidance such as 'Suffolk Risk Management Strategy Appendix A' should also be considered, especially when developing mitigation.	Relevant published guidance has been reviewed to inform the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**), **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment.**
Assessment of impacts of construction activities for cable corridor included but no reference of impacts from converter stations sites or Friston.	Noted, these aspects of the Project are now considered within the Flood Risk Assessment (see A**pplication Document 6.8 Flood Risk Assessment), Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment.**
Interception/diversion of surface water overland flow paths not included but should be scoped in.	Noted, these aspects of the Project are now considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment)**, **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment.**
Need to consider impact of increased flood risk from temporary or permanent impermeable areas.	Noted, these aspects of the Project are now considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**).

Suffolk County Council Comment	National Grid's Response
Cumulative impacts of silt and risk of resulting blockage and increase of flood risk also needs consideration.	Noted - This is considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**) and commitments to avoid increases in flood risk will be secured within the Application.
Need to consider impacts on surface water overland flow paths (not just floodplain) and potential to increase offsite flood risk.	Noted, these aspects of the Project are now considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**).
Flood risk should be scoped in for Friston due to the historic and existing flood risk.	The flood sensitivity of Friston is noted, due to the history of surface water flooding incidents. The Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**) assesses surface water flood risk and identifies management and mitigation requirements to ensure the project does not increase off site flood risk in any location from any source.
9 Local Highways Authority Comments	
SCC will act as Local Highway Authority (LHA) for the area impacted by those locations being considered for the Sea Link NSIP. There are numerous challenges relating to the access to the sites and as a result the potential for significant impacts on local communities by construction traffic.	Noted, no further response required.
Evidence needs to be provided to scope out potential degree of traffic generated at ports for construction and operation of marine cable routes.	The construction vehicle forecasts used in the traffic and transport assessments reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** include vehicles arriving from ports, except for the AIL movements for the transformers which would be nominal e.g. only seven such movements are expected to be needed in Suffolk, under controlled conditions. Assumptions have been made as to where these construction vehicles would come from and enter/exit the study area used in the assessments, as the exact ports are not known at this stage. Within Suffolk, two scenarios have been assessed to consider this variability. The HGV trip distribution for the A12 has been informed by the HGV distribution adopted for Sizewell C, where 85% HGVs were assumed to travel to/from the A12 to the south and 15% HGVs were assumed to travel to/from the A12 to the north. This distribution provides a robust assessment of the A12 to the south. To provide a robust assessment of the A12 to the north, it has been assumed that 50% construction vehicles would use the A12 to the north. Suffolk County Council confirmed they were happy with this approach in a thematic meeting prior to the submission of the DCO. Within Kent, the forecast trip distribution in terms of trips entering/exiting the study area are based on their expected points of origin when arriving to the Proposed Project (and conversely points of destination when departing) and has been agreed with Kent County Council highways. This includes trips arriving from the A299 to the west and east, as well as the A256 to the south, representing the most logical strategic routes that would be used by construction vehicles when travelling to/ from the Kent Onshore Scheme. Traffic and transport effects associated with the operational and maintenance phase are scoped out of the assessment, on the basis that vehicle movements associated with the operation of the site and maintenance requirements are anticipated to be infrequent and low. This approach has been agreed with the local highway authorities.
The applicant will need to be aware of the scale and number of projects in the area of Sea Link and consideration needs to be given the range of potential impacts including impacts as a result of HGV movements felt by communities situated along the A12, which needs to be considered as part of the assessment.	Noted, cumulative effects are considered within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** considers and assesses the cumulative schemes directly within the assessment presented within this chapter. The A12 is included in the study assessment area as it will be used as part of the routing of vehicles.

Suffolk County Council Comment	National Grid's Response
SCC welcomes discussion regarding the proposed study area and would be keen to reach an agreement on this issue as early as possible.	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
However, SCC could only confirm agreement on the scope once further details on vehicle numbers and routing were provided.	Noted. The proposed scope of assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
SCC notes the list of key junctions provided in Paragraph 2.8.3.5 but require clarification on why these have been specifically included and others have not. It is noted that the final list of junctions is dependent on the landfalls, cable corridors and converter stations.	The list of junctions set out within the assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** has been discussed at thematic meetings and reflects the routes upon which journeys will be undertaken by construction traffic.
No details have been provided on the location of traffic surveys, these should be agreed with SCC prior to any surveys taking place	The traffic survey results are set out within the assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** The scope of traffic surveys has been discussed at thematic meetings and reflects the routes upon which journeys will be undertaken by construction traffic.
t is recommended that future year assessments are agreed with the local authorities at an early stage, due to the complexity relating to the number of schemes in the area.	Noted, future year assessments are set out on the basis of peak year for traffic flow for each access, as set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. This was agreed during the transport scoping meeting held with SCC on 9 June 2023
The applicant will need to include additional traffic survey locations to reflect those additional locations recommended within the SCC Highways section of Appendix A.	The traffic survey results are set out within the assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. The scope of traffic surveys has been discussed at thematic meetings and reflects the routes upon which journeys will be undertaken by construction traffic.
The applicant will need to include daily traffic surveys, to inform greatest change, as well as the peak hour and SCC welcomes seeking agreement on this scope.	The traffic survey results are set out within the assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** The scope of traffic surveys has been discussed at thematic meetings and reflects the routes upon which journeys will be undertaken by construction traffic. The traffic survey data includes ATC count data over a two week period in order to inform potential for variance between days.
SCC notes that the Applicant plans to use the Guidelines for the Environmental Assessment of Road Traffic (GEART) Methodology. Applying either GEART, sometimes supplemented by DMRB document LA112, methodology in the assessment of transport in recent DCOs has, in the authority's opinion, required greater flexibility in the approach particularly in terms of sensitivity of receptors and application of thresholds to reflect local circumstances.	Noted, sensitivity of receptors and application of thresholds has been considered and set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport,** based on the recently adopted (June 2023) IEMA Guidelines for the Environmental Assessment of Traffic and Movement.
Clarity is sought relating to paragraph 2.8.7.8 which states proposals to assess links where traffic flows are increased by 30%. This should include proportional change in HGV movements as well as general traffic.	Noted, the proportional change in HGV movements has been considered in addition to the proportional change in traffic flows (including on the basis of the 30% threshold), as summarised within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**.
It is noted that under construction and decommissioning: results in PRoW diversions and closures that these impacts are scoped out for road links and junction. There may be a misunderstanding by what this means but for clarity SCC would expect that if PRoW diversions used roads as a diversion route that there will be impacts for PRoW, national and regional walking and cycle routes and Road users.	Noted, PRoW diversions and closures have been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
The scope of the Transport Assessment should include details on the access arrangements including drawings showing vehicle swept paths and visibility splays that would be appropriate for a planning submission	Noted, this information is contained within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Depending on the assessed impacts, junction modelling may be required however, it is recognised that this would be determined by future work.	Any requirement for junction modelling has been reviewed within **Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note.**

Suffolk County Council Comment	National Grid's Response
If any abnormal loads use SCC maintained roads the authority would require structural assessments in addition to swept path analysis.	Noted. Details on the likely routes to be used by abnormal loads and the constraints along these routes are contained within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk.** It is expected that the contractor will review all access constraints in more detail at a later stage and carry out any additional assessments (including structural assessments) where necessary. Alternative routes or temporary works will also be used if necessary.
Further information is sought on how the relative change in delay will be assessed.	Driver delay is assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** in accordance with IEMA Guidelines.
It is recognised that the thresholds suggested are 'tentative' and so should be treated as such.	Noted, no further response required.
SCC welcomes consideration on a case-by-case basis but would caution overreliance on professional judgement without supporting evidence. In the rural areas of Suffolk, a key factor is considered to be the general absence, or limited width, of footways along many roads.	Noted, the Fear and Intimidation Assessment is contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. Receptor sensitivity levels consider pedestrian facilities adjacent to each link or junction, as well as proximity to any sensitive users.
It is noted that there may be limited changes, but given the numerous projects in the area, the Applicant should be mindful of the potential for cumulative impacts. Delay may also occur due to traffic management measures implemented by this or other NSIP projects.	Noted, the cumulative assessment is contained within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Consideration should be given to whether the most recent five years is the most appropriate dataset given changes in travel patterns during and post the Pandemic	Collision data is set out within **Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note,** and was part of the scope of thematic meetings with SCC.
SCC would expect to see of these matters coherently assessed as part of the EIA.	Noted, these matters are considered within the assessment contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
10 Landscape and Visual	
SCC Landscape and Visual has raised concerns around the following areas:	Noted, no comment required.
The approach to scoping set out in 2.2.1 does not explicitly recognise the relationships the relationships between landscape and visual matters and other parts of the EIA, specifically ecology, historic environment, socio-economic and tourism and traffic and transport. SCC considers that to ensure a comprehensive assessment of landscape and visual effects the relationships between this chapter and other matters in the EIA should be clearly recognised. It is notable that such relationships are explicitly recognised in the scoping for the East Anglian GREEN project, also promoted by National Grid Electricity Transmissions (NGET).	The Landscape and Visual Impact Assessment, set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, has been produced in collaboration with other disciplines. This has been achieved since the Proposed Project Inception and a collaborative approach from all disciplines has informed the routeing and siting of the Scheme as well as the mitigation design.
The relevant data sources proposed appear acceptable, but SCC would also recommend reference to the Designation History Series which relates to the Suffolk Coast and Heaths AONB.	The Designation History Series has been referred to within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
The applicant should also be aware of the cultural importance of the Suffolk coast including the Aldeburgh/Snape area.	The relevant information, including reference to cultural importance, within the Suffolk, Norfolk, and North Essex Seascape Character Assessment has been referred to within the landscape baseline. Further information on cultural matters should be referred to within **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Figures 2.2.9 (Site 1) and 2.2.10 (site 3) - SCC notes the same set of viewpoints have been used for Site 1 and Site 3. This results in some viewpoints being outside Zones of Theoretical Viewability (ZTVs) for one or both sites.	This comment is no longer relevant as there are no longer Converter Station option sites.
For the purposes of clarity each site should have its own figure showing only the viewpoints relevant to this option.	This comment is no longer relevant as there are no longer Converter Station option sites.

Suffolk County Council Comment	National Grid's Response
The SCC reserves the right to request additional viewpoints, or revised viewpoints to support the final EIA.	Representative viewpoints have been discussed regularly at landscape and visual thematic meetings and additional meetings with SCC landscape and other stakeholders. This has included the addition of new viewpoints since the production of the Preliminary Environmental Information Report. The representative viewpoint selection should be referred to within **Application Document 6.4.2.1.7 Representative Viewpoint Locations.**
SCC also considers it necessary to include both specific and illustrative viewpoints (a combination of wireframe or photomontage visualisation may be appropriate).	The representative viewpoint selection should be referred to within **Application Document 6.4.2.1.7 Representative Viewpoint Locations and visualisations** should be referred to within **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations.**
A comprehensive approach to important hedgerows under the Hedgerow Regulations 1997 will also be required. This should identify all hedgerows along the routes that are important under the various historic and designation related criteria, in addition to the ecological matters under the regulations as set out in Section 3 and Schedule 1 of the Regulations.	The DCO application includes the following plans - **Application Document 2.12.1 Trees and Hedgerows to be Removed or Managed Plans - Suffolk** and **Application Document 2.12.2 Trees and Hedgerows to be Removed or Managed Plans - Kent.** The Ecology ES Chapter and **Application Document 6.3.2.2.A Appendix 2.2.A Phase 1 Habitat Survey Report** contains an assessment of Important Hedgerows.
All hedgerows to be removed to facilitate construction along the route should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration, as well as mitigation for the adverse ecological impacts caused by their temporary loss as mature features in the landscape.	A hedgerow survey assessment against the Hedgerow Regulations has been undertaken and the outputs can be found in **Application Document 6.3.2.2.A Appendix 2.2.A Phase 1 Habitat Survey Report.** The DCO application includes the following plans - **Application Document 2.12.1 Trees and Hedgerows to be Removed or Managed Plans - Suffolk** and **Application Document 2.12.2 Trees and Hedgerows to be Removed or Managed Plans - Kent.** The Ecology ES Chapter and **Application Document 6.3.2.2.A Appendix 2.2.A Phase 1 Habitat Survey Report** contains an assessment of Important Hedgerows.
These should include loss of vegetation	Noted, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** which assesses the impact of vegetation/ habitat loss. All hedgerows along the route to be removed are included within **Application Document 2.12.1 Trees and Hedgerows to be Removed or Managed Plans - Suffolk.**
There appears to be an inconsistency in the approach to this matter. Operational Lighting is scoped in for all emerging preferences and alternative options (vol.1 part 2 p124) in relation to ecology, whereas it is scoped out for landscape and visual amenity (p43). SCC considers this is neither appropriate nor consistent and converter station lighting should be scoped in for landscape and visual amenity.	Lighting design is referred to within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The Landscape and Visual Impact Assessment, includes lighting in the assessment of the Suffolk Onshore Scheme on both landscape and visual receptors during the operational phase, for further detail please refer to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
It is welcome that permanent alteration to landscape character of the AONB is scoped in (p50) for operation, although the applicant's initial position is that harm will be less than significant. However, SCC considers it is essential, based on current information, that the cumulative impact (both landscape and visual) of three converter stations located at site 1 should be assessed. It is noted that potential effects on the AONB have been scoped out entirely for the operation of site 3 (p53) as it has been identified that there is no potential for effects on the setting of the designation	The effects of the Suffolk Onshore Scheme on the Suffolk and Coasts AONB, including the setting, is included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects.**

Suffolk County Council Comment	National Grid's Response
11 Public Rights of Way (PRoW)	
Methodology - EIA does not holistically consider how potentially significant impacts that may arise from construction and operation on PRoW, permissive access, open access land and promoted routes.	PRoW diversions and closures have been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport** as well as **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
Cumulative impacts of the proposal with other existing energy projects consented or proposed in the area.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Impact of temporary closures of PRoW.	PRoW diversions and closures have been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** as well as **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
Impact of pre-commencement works (including archaeological, ecological, site investigations, site clearance) have not been included in post-commencement plans, specifically level and control of traffic using PRoW for site access.	Please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** which details the works which constitute the terrestrial Enabling Works, Access, and Site Preparation. These aspects have therefore been assessed and considered within the technical environmental assessments. With specific reference to PRoWs, please refer to **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** which has been prepared which provides details of measures and mitigation to avoid any significant PRoW impacts.
12 Other Potential Impacts	
It is acknowledged that this scheme could potentially cause impacts for the emergency services with reference to potential highways diversions, AIL movements and related traffic delays.	**Application Document 6.2.2.1.1 Part 2 Suffolk Chapter 11 Health and Wellbeing** concluded that there are no anticipated significant effects.
SCC requests that the applicant considers the cumulative impacts of construction activities on local communities of a number of projects potentially occurring with overlapping timescales in the area of the Sea Link proposals.	Noted, a full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The full assessment is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
These cumulative impacts would include traffic delays caused by diversions or an increase of HGV movements, increase in demand of rental accommodation,	Noted, the impacts to the road network resulting from the Proposed Development alongside cumulative developments has been considered inherently within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport.** The impacts on demand for rental accommodation resulting from the Proposed Development and cumulative developments are considered within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism** and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
13 SCC Archaeology	
The longer the cable routes, the greater the potential archaeological impacts and the scale and scope of investigation and mitigation. Where cables pass through watercourses there is potential for well-preserved stratified sites in and on the valley sides as well as paleoenvironmental remains.	Noted, no further comment required.

Suffolk County Council Comment	National Grid's Response
It is essential that further refinement of the siting/routing methodology should include a search of the HER/Desk-Based Assessment and should consider the impact of the proposed development on designated and non-designated heritage assets and sites of archaeological potential, drawing on landscape and topography. Attention should also be given to assessing the relative importance of any World War 2 remains in relation to the defensive coast.	Noted. A search of the Suffolk HER as well as a number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G.** All survey works were undertaken in accordance with WSIs approved by the Suffolk County Council Archaeological Advisor. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage).**
Given the interaction with the EA1N/2 scheme and also potentially Sizewell, Galloper and Greater Gabbard depending upon the design options which are selected, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme. The EA1N/2 geophysical survey data and some of the Sizewell geophysics and trial trenching results are publicly available as part of the relevant examinations and the County HER hold report for the Galloper and Greater Gabbard projects – SCCAS are also happy to advise on the findings where reports are not yet available. These surveys illustrate how much information is added to HER data through systematic survey, realising archaeological potential, as a significant number of archaeological sites have been defined which were not previously recorded on the County HER, or associated with finds scatter or cropmark evidence.	Noted. The Sea Link Team have liaised with the EA1N/2 team with data sharing between projects, and this holistic approach to working has continued with Lion Link and Nautilus which also now overlap with Sea Link. This data has been incorporated into the baseline report (**Application Document 6.3.2.3.A ES Appendix 2.3.A Archaeological Baseline Report**), and used to inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
There should not be an assumption that data within the Historic Environment Record (HER) is of local significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets. Sites of archaeological potential which have not yet been subject to systematic assessment (and are therefore currently of unknown significance) should also be considered.	Noted The value of non-designated assets has been assigned based on the definitions provided in the assessment methodology. This value is based on various sources of information including data from evaluation excavation where available.
The current onshore study areas have in most parts not been subject to systematic archaeological investigation and, therefore, the character, extent, and significance of surviving above and below ground heritage assets across this area has yet to be defined. There is high potential for additional, and to date unknown, significant heritage assets to survive across much of this area. Some of these may be of national significance and worthy of preservation in situ. As such without further assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.	Noted. A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G.).** The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**). No non-designated assets of national significance have been recorded within the Order Limits.
All onshore elements of the scheme (for example, landfall sites, converter station sites, grid connection substation site, underground cable corridors, jointing bays, link boxes, Horizontal Directional Drilling (HDD) pits and any other impacts associated with the scheme for example, haul roads, compounds, planting and ecological mitigation, offsite transport improvements etc.) have the potential to damage or destroy any surviving archaeological remains so all elements of the scheme should be scoped in for archaeological assessment. Decommissioning work also has the potential to have an impact, but this is not currently recognised within the scoping documentation (table 2.41). The document states that works would have no impact as all archaeological remains will have been mitigated and removed, however, this overlooks the potential for remains which are being preserved in situ and therefore need to be protected from disturbance throughout all phases (including during any maintenance works). Also, the compounds associated with this work also have the potential to	Noted. Potential impacts are all assessed as part of the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).

Suffolk County Council Comment	National Grid's Response
impact upon below ground remains if located in areas which have not already been subject to archaeological mitigation.	
To inform the siting and routing of the proposed scheme a thorough desk top assessment and field evaluation is needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.	A number of surveys have been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F** and **6.3.2.3.G**). The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
A desk-based assessment would be appropriate in the first instance. This should include a historic map regression, a study of aerial photography (including historical imagery), an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.	Information has been collected from various sources, while a number of surveys have also been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G.**). The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.	Noted Historic Landscape Characterisation data supplied by Suffolk County Council HER was included in the baseline report, while elements such as hedgerows and boundaries were also examined. Discussions were also held with other relevant subject specialists including ecology and LVIA. This data is presented in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and used to inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Landscape should be considered for assessment as an aspect of the historic environment. There will be interrelationships in assessment between archaeological and the built environment. The lack of a holistic approach to assessing the impact on landscape has given rise to omissions in other recent DCO applications.	Noted. Impacts on landscape, as well as the relationship between 'landscape' and the setting of assets has been considered as part of the assessment where appropriate. The landscape of the Suffolk Onshore Scheme is discussed in the baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) with any potentially significant impacts identified assessed in the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Earthwork survey and building assessment should be undertaken of upstanding remains, particularly Second World War remains, to properly assess their significance in the context of the defensive coast.	Significance of assets has been based on various surveys including walkover surveys and site inspections. Significance is discussed in the baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**), with impacts assessed (where appropriate) in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
All areas which will be impacted upon by the different elements of the scheme should be subject to archaeological field assessment at this stage in considering the location, layout and design of the landfall, converter station site, grid connection substation site, cable route, jointing bays, link boxes and HDD pits to allow for preservation in situ where appropriate of any sites of importance that might be defined (and which are currently unknown).	Information has been collected from various sources, while a number of surveys have also been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G**.). The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
Geophysical survey (a combination of magnetometry and resistivity as appropriate), also accompanied by fieldwalking and a metal detecting survey, should form a first phase of field evaluation.	Information has been collected from various sources, while a number of surveys have also been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological**

Suffolk County Council Comment	National Grid's Response
	Baseline Report) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G**.). Methods deployed have been discussed and agreed with relevant stakeholders including Suffolk County Council Archaeological Advisor, with works approved through appropriate WSIs. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
The results of these assessments should be used to then inform a programme of trial trenched evaluation, combined with paleoenvironmental assessment in river valley areas.	Information has been collected from various sources, while a number of surveys have also been conducted to inform the Cultural Heritage assessment. These are synthesised in the Cultural Heritage baseline report (**Application Document 6.3.2.3.A Appendix 2.3.A Archaeological Baseline Report**) and are provided in full within **Application Document 6.3.2.3.B, 6.3.2.3.C. 6.3.2.3.D, 6.3.2.3.E, 6.3.2.3.F and 6.3.2.3.G**.). Methods deployed have been discussed and agreed with relevant stakeholders including Suffolk County Council Archaeological Advisor, with works approved through appropriate WSIs. An initial review of data collected as part of the Ground Investigation works has been undertaken. Further works, if considered necessary, will form part of pr-construction works if consented. The surveys have been used to provide details relating to the significance of heritage assets, and inform the Cultural Heritage assessment (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage**).
14 SCC Ecology	
Below are the comments of SCC Ecology.	Noted, no further response required.
At 2.3.3.4, the Applicant states: "…only statutory designated sites up to 2km from the Suffolk Onshore Scheme Scoping Boundary have been shown but this will be updated and expanded for the Preliminary Environmental Information Report (PEIR)."	Noted, no further response required.
To this point, SCC would add that, depending on routes for HGVs, workers, materials and so on, other sites enroute may also be affected. This should be taken into account when researching and writing the PEIR. Impacts may include visual disturbance, dust, noise, air quality and so on.	Noted - all potential impact pathways to designated sites are considered within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity**.
Although it is mentioned elsewhere, non-statutory wildlife sites (in Suffolk these are County Wildlife Sites (CWS) are very important elements of nature conservation and full details can be obtained from Suffolk Biodiversity Service (SBIS) (https://www.suffolkbis.org.uk/)	Noted, no further response required.
·In addition, SBIS can provide the up-to-date lists of Suffolk Priority Species and Habitats. It is important that these are given appropriate consideration and weighting.	Noted - a desk study has been undertaken for the ES
At 2.3.4.1, the Applicant does confirm that they will consult, inter alia, SBIS and the other bodies in order to carry out the desk-top part of data gathering, and SCC emphasises the importance of ground-truthing…	Noted, no further response required.
At 2.3.4.2, the Applicant confirms that they will consult the previous survey reports submitted for, e.g., East Anglia One North, East Anglia Two and Sizewell C (SZC). There is a great deal of information and data within those previous applications and, if all that data is to be considered, this will be a task of considerable magnitude.	Noted. We will draw on relevant information but our own survey data will supplant that in those older reports. Moreover, the footprints of the schemes are now more clearly separate.
At 2.3.4.3, the Applicant sets out the expected survey requirements and these seem reasonable.	Noted, no further response required.
At 2.3.4.4, the Applicant acknowledges the necessity of carrying out Habitats Regulations Assessment(s). This will be essential.	Noted, no further response required.

Suffolk County Council Comment	National Grid's Response
At 2.3.4.11, the Applicant pledges to deliver a minimum of 10% Biodiversity Net Gain, which is welcomed.	Noted, no further response required.
At 2.3.4.12, the Applicant confirms that Phase One Habitat Surveys commenced in May 2022. The Applicant confirms that they will have regard to the Habitats of Principal Importance (HoPI) but, as mentioned above, similar regard must be given to Suffolk's Priority Habitats.	Noted, no further response required.
At 2.3.4.13, the Applicant acknowledges parcels of Ancient Woodland but should be made aware that SCC is currently carrying out an Ancient Woodland Inventory which may update the records currently available. The Applicant can obtain updates on the Inventory through SBIS (as and when it is available) or contact the SCC Ecology Team who can provide a point of contact.	Noted, no further response required.
At 2.3.4.18, the Applicant acknowledges Invasive Non-Native Species (INNS) but confines comments to plants. Fauna can also be INNS, and, in East Suffolk, this may include Muntjac Deer, Chinese Water Deer, American Mink and, amongst others, non-native species of Crayfish. These deleterious species should also be taken into account. SCC adds that, although there are no confirmed reports of Dormouse in the area, an eye should be kept open as this species is expanding its habitat. The Applicant acknowledges the necessity of monitoring Badger activity, and we feel sure that their Ecology Team will not need reminding that Badgers are a very successful species across this County, highly mobile (and with a tendency to pop up in all sorts of places). It is anticipated that a continuous watching brief will be needed and recognising Badger signs made part of regular Tool-Box Talks.	Noted, no further response required.
At 2.3.4.41, we welcome the Applicants acknowledgement that: "Due to developmental pressure year on year within the wider landscape, protected and notable species and habitats are likely to remain priorities for conservation within future baseline scenarios." This is explicit acknowledgement that this proposal, in association with the others in a relatively modest geographical area could well prove to have the most serious consequences on Suffolk's wildlife and habitats. This is why we require the Applicant to consider any and all avoidance and mitigation when finalising their proposals.	Noted, no further response required.
At 2.3.5, we welcome the Applicant's proposal to use trenchless techniques where possible and they give, as an example, crossing rivers. Are they confident that this can work with an extensive marsh and ditch network? Confirmation would be gratefully received.	We believe this is a reference to the RSPB Reserve. This will be HDD under and information has been provided to the Suffolk Councils to confirm that HDD is feasible. The assessment in the ES will also discuss implications for surface hydrology but due to depth no impact is expected.
At 2.3.5.4, the Applicant suggests certain potential mitigation strategies that may be included in the Outline Code of Construction Practice (CoCP) (such as bat boxes) but, in my view, the mitigation must be informed by the results and analysis of the Phase One Habitat Survey together with the various species and habitat specific surveys. Although they are just given as examples, the mitigation strategies (in the light of the acknowledged substantial disturbance in this area), may have to be considerably more than at a "normal" stand-alone development. The Applicant has mentioned "dead hedging" and SCC would be grateful for sight of evidence showing how this has been achieved and how successful it has been (as, for example, a navigation corridor for Bats).	Noted, the mitigation in the DCO has been specifically informed by the ES and HRA.
The "scoping in" of potential impacts appears sound but this must also be informed by the results of the various surveys	Noted, no further response required.
The proposed assessment methodologies also look sound, taken as they are from CIEEM. Please ensure that Suffolk Priority Habitats and Species and County Wildlife Sites form part of this.	Noted, no further response required.
SCC would be grateful if all surveys results can be sent to SBIS to update their records. We suggest that SBIS are contacted (https://www.suffolkbis.org.uk/) to find out the best formats to deliver that data.	Noted - SBIS have been contacted and data obtained.

Suffolk County Council Comment	National Grid's Response
At 2.3.7.9, the Applicant states "Cumulative effects will be assessed and are those occurring from several sources (also known as inter-relationships) and/or the combined effects of other developments in the area." The cumulative effects of this proposal alongside all of the other proposals in this area are, perhaps, the largest concern of all. There is, I believe, a real danger that this part of the Suffolk Coast (an AONB and benefitting from a number of nature conservation designated, protected sites) will become a huge building site, with different projects all striving to deliver their goals, causing massive destruction and disturbance that could well sterilise this area for wildlife for many years to come.	Noted, no further response required.
How will the in-combination effects of all of the proposed developments in the area be assessed, mitigated, and compensated for? I have yet to see any attempt to address this.	This has been addressed in the ES and the in combination section of the HRA. Ultimately, however, Sea Link is only responsible for mitigating its own contribution to any effects. Effects of other projects will be assessed to the extent possible based on available information at this stage. Some projects of relevance are running several years behind Sea Link which limits the cumulative assessment possible as part of the Sea Link DCO. For further detail please refer to **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.6 Habitats Regulations Assessment.**
The Applicant talks of constraints arising from other developments informing the choice of sites for the delivery of Sea Link but (unless I have missed it) there is no explanation of what these constraints are or how they might be mitigated rather than disturb or destroy a neighbouring parcel of land.	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered, including potential landfall and converter station locations, are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
This may be exceedingly naïve, but why cannot this proposal be co-ordinated with the others envisaged? Are the haul roads, link roads, depots, bypasses and so-on available for other developments not be co-ordinated and repurposed? I think that there is genuine (and well-founded) concern that this part of the coast will become criss-crossed with the developments themselves, their accesses, service routes and the power cables themselves.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
In the absence of the essential biodiversity data (which was only commenced in May 2022), it is not possible to make anything other than general statements about those sites being given preference by the Applicant.	Noted, no further response required.
Certainly, Site 3 (East of Saxmundham) appears to be a large arable field and it is easy not to anticipate too much in the way of wildlife interest, but it is essential to wait for the results of the surveys. Should this site be selected, good quality Biodiversity Net Gain would be entirely possible to deliver by the boundary treatments for a start… (further ideas could include green walls and green rooves for the converter station buildings, treating the areas around the cables and poles within compounds with, e.g., mosses and lichens and so on).	Noted, no further response required.

Suffolk County Council Comment	National Grid's Response
Site 1, West of Aldeburgh was much more difficult to assess from the ground without gaining access. There are Coverts, dead ground, and more dynamic topography here so it would be far too premature to assess this area without the benefit of ecological surveys	Noted, no further response required.
The working corridor S1 is proposed to cut through an area of exceptional importance to wildlife (an RSPB Reserve and SSSI) and, without a much fuller understanding of the techniques and mitigation(s) being used, I can only raise considerable concerns about disturbance, loss of and sterilisation of habitat and so on. As with the Converter Station Sites, in the absence of ecological data and the fullest mitigation and compensation strategies, the impact on wildlife can only be guessed	Noted - further information has been shared with Suffolk Council and other stakeholders regarding the feasibility of HDD and the extent to which this will avoid surface impacts. That is detailed in the ES and HRA
The working corridor S3 is so vague in detail that, as with S1 above, the harm can only be guessed	Noted, the design of the Proposed Project has evolved and been refined since submission of the EIA Scoping Report. For the latest design details, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Landfall for either will be through Coastal Vegetated Shingle, a Suffolk Priority Habitat (hence the designation of so much of this part of the coast as County Wildlife Site). How will impacts be minimised and mitigated?	This habitat will be avoided through the use of HDD
For both the Converter Station Site(s) and the Working Corridors, asking us to hazard a guess in the absence of properly gathered data together with meaningful site walkovers (we have tried to gather information by driving and walking as close as we could in very limited time) is rather unfair.	Noted. It is a statutory process as part of the DCO to undertake scoping and that exercise had to occur prior to many baseline surveys had been undertaken to adhere to the overall DCO programme. Suffolk Council have been kept informed of ongoing surveys and their key outcomes.
I am concerned that these routes have been chosen by aerial photography and some maps rather than fully informed by walkovers by properly trained personnel. Despite the number of developments in the area, we do not know every square foot of land and, I think, there is justifiable concern that choices are being made by Google Earth rather than thorough site investigations. If I have this wrong, I unreservedly apologise and will happily look at the biodiversity data that the Applicant has gathered and re-appraise the situation.	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered, including potential landfall and converter station locations, are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**. As noted in these reports the appraisals have been informed by data and evidence collected from both desk-based studies and site visits.
In the meantime, I can only repeat those points made previously	Noted, the points raised have been responded elsewhere within this appendix. No further comment required
There are a notable number of NSIP scale projects in the vicinity. How will the in-combination effects of this project impact upon their proposed mitigation, compensation, and enhancement measures? How will this project impact upon the Conservation Objectives of nearby European Designated Sites? How will this project impact on other designated sites such as SSSIs and CWSs?	A cumulative effects assessment has been carried out and is presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects**, this assessment has considered NSIP projects within the cumulative study area and the interaction with these projects. **Application Document 6.6 Habitat Regulations Assessment Report** will also explicitly consider in combination effects on European sites.
The proposal anticipates cutting through the RSPB's North Warren Reserve. This has the potential to impact upon thousands of Wildfowl (Ducks, Geese and Swans) that over-Winter here as well as breeding Bittern, Marsh Harrier, Woodlark and Nightingales. Is this really the path of least disturbance?	It is considered that disturbance of this site can be minimised through trenchless technique (for example HDD) and the use of noise and visual disturbance fencing. Data to this effect has been shared with Suffolk Council. For further information please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity.**

Suffolk County Council Comment	National Grid's Response
Is a "new" route for this tranche of cables more or less damaging and disturbing to wildlife than re-using existing proposals?	It is not clear what is meant by "re-using existing proposals" in this context. A robust alternatives assessment has been undertaken for the Proposed Project which considers viable options for the proposed cable route. Further information on the alternative cable route options considered is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
How much will this proposal impact upon wildlife displaced to the Applicant's preferred areas by activities at the several other projects in the area?	It is not possible to assess displacement by future projects in detail because by definition it is not possible to know what that displacement will be, or of which species or to which locations. This is something that generally would need to be considered in the cumulative impact section of those other future projects.
Will the disturbance caused by this proposal displace wildlife to areas impacted upon by the other NSIPs in the area?	There is likely to be some displacement but it is impossible to assess to what extent displaced wildlife will move to areas where other projects will come forward in the future, as opposed to other areas of land. The Proposed Project will seek to minimise any displacement by working through cable sections as quickly as possible and once cable sections are restored displacement is expected to be temporary. Some of the key other projects are running several years behind Sea Link and therefore it shouldn't be assumed construction will occur simultaneously.
How much liaison will there be between those wildlife and habitat professionals working on this proposal with others in the vicinity?	National Grid have held meetings with other surveyors on the other projects and have sought to share data and avoid duplication of effort where possible, noting that the projects are on different timelines.
What sort of monitoring and mitigation will be in place? How will this interact with other schemes in the area?	Monitoring and mitigation relevant to the impacts identified from the Proposed Project are detailed within the technical environmental ES chapters. Please also refer to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC).**
How long will this proposal take to deliver on the ground? Will there be mitigation by timings to avoid the most sensitive seasons for the species most likely to use the area?	A programme was published in the PEIR and is shared in the DCO, specifically within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Proposed Project Description**. For some features seasonal avoidance will be possible and this has been documented in the ES, please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity.**
What will the site look like during construction (in terms of attractiveness to wildlife)?	The impact on wildlife during construction will be assessed in the ES. Please refer to **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity.**
How will ecological connectivity be maintained whilst waiting for mitigation measures to take effect?	This is set out within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology & Biodiversity**. In some cases connectivity (particularly along hedgerows) can be maintained through use of artificial hedgerows that can be moved into place at night (suitable for bats) and retaining existing hedgerow sections. For further details, please refer to **Application Document 6.2.2.2 Part 2 Chapter 2 Ecology & Biodiversity.**
What will this site look like (for wildlife) in five years, ten years, and fifteen years after the works?	This is set out in the ES documentation, please refer to **Application Document 6.2.2.2 Part 2 Sufolk Chapter 2 Ecology & Biodiversity.**
How will enhancement/Biodiversity Net Gain be delivered?	This is set out in the DCO documentation. Please refer to **Application Document 6.12 Biodiversity Net Gain Feasibility Report.**

Suffolk County Council Comment	National Grid's Response
15 SCC Economic Development	
The following response is to the scoping consultation and notification for the Sea Link Project proposed by National Grid Electricity Transmission plc in relation to its socioeconomics and tourism impact. It identifies the further work required to ensure that there is an appropriate understanding of the impacts of the scheme prior to the development being submitted as an application.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** carries out an assessment of effects of the Proposed Development on socio-economics, recreation and tourism. For further information on the specific effects and any mitigation proposed please refer to this chapter.
The upsurge of energy development in the East of England, making it the epicentre of low-carbon energy developments in the UK, has, and will, create many potential opportunities for growth within the county. These opportunities have been identified in the Government's, Levelling Up the United Kingdom White Paper, specifically with regards to nuclear power, offshore wind power and integrated electricity networks in our region.	Noted, the impact on local employment is assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**.
For Suffolk, the energy opportunities are due in large part to the geographical benefits the county offers. For example, the shallow seas and the existence of ports, makes it an ideal location for the development of offshore wind. The flat open landscapes and relatively higher rate of sunny weather in the county, also makes it attractive for solar farm installations. Whilst existing nuclear generation, and available grid connections, support new nuclear build.	Noted, no further response required.
This attractiveness and suitability of Suffolk for energy development, makes it a critical region for the UK and the Government as it delivers on its Net Zero commitment to cut emissions, decarbonise energy generation, bolster energy security and seize green economic opportunities. Given these conditions, the challenge for Suffolk is to effectively shape these extensive energy developments, extracting the best and most sustainable value from them, for the communities and businesses of the county. Simultaneously, the sensitivity and importance of the environment of Suffolk in terms of; place, tourism, and ecosystems, needs to be protected and enhanced, and not undermined by the delivery of Net Zero projects.	This comment has been noted. The impacts on private, community, tourism and recreation assets are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism.**
The challenge for any developer is delivering benefit and enhancing sense of place in a very congested market. National Grid are proposing a construction period between 2026 and 2030, a time where Suffolk alone is expecting to see the construction of offshore wind projects: • East Anglia Three • East Anglia One North • East Anglia Two • Five Estuaries • North Falls Further construction work from National Grid: • National Grid Ventures Eurolink • National Grid Electricity Transmission Bramford to Twinstead • National Grid Electricity Transmission East Anglia Green	• East Anglia Three • East Anglia One North • East Anglia Two • Five Estuaries • North Falls The above projects have been assessed within **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** • LionLink (Eurolink) • East Anglia One North • East Anglia Two • Norwich to Tilbury (EAG) The above have been assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** National Grid Electricity Transmission Bramford to Twinstead has not been assessed within the Cumulative Effects Assessment as it is situated 32.6 km away from the Suffolk Onshore Scheme Boundary and therefore falls outside the ZOI.
Construction of the new nuclear plant Sizewell C, alongside significant rail and road infrastructure projects and house building. The cumulative impact of these Suffolk projects alone, coupled with similar projects in the neighbouring authorities of Norfolk and Essex will place significant pressures	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined

Suffolk County Council Comment	National Grid's Response
on workforce availability, supply chain demand and cumulative impact on tourism which SCC expect the applicant to reference when conducting their assessment. • The Sizewell C Project: https://infrastructure.planninginspectorate.gov.uk/projects/eastern/thesizewell-c-project/ • East Anglia One North Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/eastanglia-one-north-offshore-windfarm/ • East Anglia Two Offshore Windfarm https://infrastructure.planninginspectorate.gov.uk/projects/eastern/eastanglia-two-offshore-windfarm/	environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
A large amount of information and data is available from these projects, and this should be considered as part of the development of the Sea link proposals. SCC would recommend that there is close collaboration between NGET, SPR, Sizewell C Co., East Suffolk Council and Suffolk County Council.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Oshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** Consultation with other developers has been undertaken as required in order to obtain accurate timelines of their developments so assessments can be made.
The proposed development will have varied impacts dependent upon the chosen landfall site, corridor route and converter station site therefore, SCC is seeking to establish a set of principles that will be used to guide impact assessment regardless of route and siting selection ensuring all impacts are fully analysed and mitigated appropriately.	Noted, please refer to **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** which outlines the assessment methodology applied within the various technical environmental assessments. Where specific topic guidance has been followed that deviates from the standard methodology outlined within Chapter 3, this has been explicitly stated within the technical ES chapters.
Whilst the scoping report provides information on the high-level emerging proposals for the scheme, limited information is provided on socioeconomics, particularly the scale of impact and opportunity associated with the workforce. On this basis SCC are providing comments on the information provided and the details that SCC would encourage the Applicant to provide as part of future submissions, and comments on the proposed assessment methods. Once specific details are available, SCC must reserve the right to alter, amend and add to any comments made herein. The additional details that are requested would help in our ability to comment and to address our concerns. The comments below should be considered together with those from the following topic areas due to the interaction of impacts: • Traffic and Transport • Landscape and Visual • Noise and Vibration • Air Quality • Cultural Heritage	This comment has been noted and specific comments will be responded to in the rows below. The impact on the economy, including construction workforce, is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
In particular, when considering traffic and transport impacts, paragraph 2.8.16 sets out that a 'simple gravity model' will be developed for the workforce origins. SCC currently disagrees with this approach. SCC is of the opinion that there is significant risk in this approach given the number of large infrastructure projects in the area and therefore the availability of a local workforce depending on which projects come forward and when. It is considered that substantial consideration needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact. It is also noted that paragraph 2.11.7.11 sets out that an estimated workforce and that a 'proportion of workers are likely to live locally to the site,' which will need to be evidenced. Any assumptions around workforce origins within the socio-economic assessment should be reflected in the assessment of transport impacts.	The forecast trip distribution of construction staff vehicles has been based on a simple gravity model which has been developed based on 2021 Census data for construction workers living within a 60-minute catchment area of the site. Whilst it is acknowledged that the dataset was collected during the COVID-19 pandemic, this represents the latest information currently available (as opposed to using information from the 2011 Census) and is considered to be appropriate for identifying the districts where construction workers may live. Note, the gravity model has only been used to derive a forecast trip distribution, so that potential impacts associated with construction staff travelling to/ from the Proposed Project can be assessed. This approach was agreed with SCC Highways during the transport scoping meeting held in June 2023, as documented in **Application Document 6.2.2.7.B Appendix 2.7.B Traffic and Transport Scoping and Thematic Meeting Minutes.** Detail regarding construction workforce availability is included and assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism,**

Suffolk County Council Comment	National Grid's Response
	Section 9: Assessment of Impacts and Likely Significant Effects and in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects.**
The following topic areas have not been covered in the current scoping document and will need to be considered by the applicant to ensure an appropriate understanding of impacts: • Accommodation • Community Chapter 2.11 of Volume 1 Main Text – Part 2 Suffolk Onshore Scheme of the EIA Scoping Report considers the potential significant socio-economic, recreation and tourism effects of the project during construction, operation, maintenance, and decommissioning.	The impact on the economy, and private, community recreation and tourism assets, including accommodation capacity, is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**
At this point in the process workforce numbers and phasing are unconfirmed and therefore, any areas that workforce will interact or impact upon cannot be scoped out of the Environmental Statement as there is not enough information to make an informed decision. This will include: • Effects on Tourist Accommodation During Construction • Effects on the Local Economy During Construction • Effects on Local Businesses, Jobs and Employment During Construction • Effects to Planning and Development During Construction • Effects to Community Services During Construction and Operation • Effects on Tourism and Recreation During Construction As part of future submissions, a workforce profile should be provided outlining: • Peak workforce numbers • Average daily workforce numbers • Broad competencies of the workforce (i.e., civils, mechanical, electrical etc.) • Anticipated split of home based and non-home-based workforce	Since publication of the EIA Scoping Report further detail has been provided, for the latest information relating to construction and operational workforce numbers and phasing please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The impact on the economy, including construction workforce, and private, community, recreation and tourism, including accommodation capacity, is considered within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
These profiles will need to be set against the construction timeline.	An indicative construction programme has been set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
The Environmental Statement will also need to consider the impact and opportunities the development may place on the local labour market. It should set out clearly the expected number and nature of employment opportunities during each phase of the development. It should relate this to the availability of labour in the area and identify how any mismatch between supply and demand will be addressed	A complete assessment of socio-economics effects has been undertaken. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism,** Section: 9 Assessment of Impacts and Likely Significant Effects includes an assessment of the employment generated by the Suffolk Onshore Scheme during the construction phase. It is concluded that there are no anticipated significant socio-economic effects. Operational Employment has not been included within the Assessment of Impacts and Likely Significant Effects as agreed at scoping stage. The Planning Inspectorate is content for this matter to be scoped out. The level of employment generation in operation is explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
Furthermore, the applicant has not defined a study area from which it will consider effects on employment, as part of future submissions a study area will need to be defined using relevant travel to work data for the appropriate locations to arrive at a sensible zone of influence. This is alongside a supply chain assessment, that would identify local supply for construction and decommissioning, being conducted over a far greater geography ensuring areas such as Ipswich and Lowestoft, where a significant supply chain supporting other infrastructure builds, is located. Maximising the use of local and regional supply chains should be a priority for the applicant, this is consistent with SCC corporate objectives as set out in Suffolk County Councils Energy Infrastructure Policy and the applicants own corporate objectives.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 6: Study Area sets out that employment generation during the construction phase will be assessed within a 60 minute travel area, based on research by the Chartered Institute of Personnel and Development (CIPD).

Suffolk County Council Comment	National Grid's Response
Consideration needs to be given to the potential impact of any reliance on a mobile workforce for the availability of tourist accommodation. The spending patterns of a transitory labour force are fundamentally different to those of a static workforce and benefits do not accrue in a normal manner. Spending patterns are also vastly different to visitors that may be displaced, thus this might jeopardise trade for other related tourist businesses, such as restaurants and visitor attractions.	The impacts on the economy, including construction workforce, and private, community, recreation and tourism assets, including accommodation capacity, are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**
In all cases, the impact of this project must be considered alongside others in the region – particularly other Nationally Significant Infrastructure Projects. For example, East Anglia Hubs onshore construction and Sizewell C.	A full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The Inter-project cumulative effects assessments have assessed the combined environmental impacts resulting from Proposed Developments due to come forward within the cumulative zone of influence. The full assessment methodology used to inform the inter-project cumulative assessment including the approach to identifying the long list and shortlist is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter Kent Onshore Scheme 13 Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.**
It is acknowledged that the likely demands on the workforce and the supply chain are likely to be less than those of other infrastructure projects in the region. However, it is vital that the workforce assessment considers the different skill and competency demands on the different phases of the project and assess these cumulatively with other potential major construction projects.	Construction phase workforce impacts are considered in **Application Document 6.2.2.10 Part 2 Chapter 10 Socio-economics, Recreation, and Tourism** and **in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
The project is also likely to be in construction at the same time as the Sizewell C and ScottishPower Renewable Hub are reaching the peak of their construction employment. There is a very high likelihood that achieving any home-based labour will be extremely difficult as these projects will be well established. SCC expects the applicant to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions. SCC also expect the applicant to reflect these findings within all topic areas where workforce origin will have an impact, such as: • Traffic and Transport • Communities • Accommodation	The impact on the economy, including construction workforce, and private, community, recreation and tourism assets, including accommodation capacity, is considered within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 9: Assessment of Impacts and Likely Significant Effects. Cumulative effects of the Proposed Project are considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
A large proportion of tourist trips are associated with the natural and historic beauty of the area as a whole. Therefore, it is more relevant to consider the extent to which the impact of construction in the landscape detracts from the environmental quality for recreational activity more broadly and the perception and propensity of people to visit the area.	The impact on private, community, recreation and tourism assets is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.** Receptors that fall outside of the study areas are considered if it is deemed that significant effects are likely. The impact on landscape and visual amenity is covered in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
The Environmental Statement needs to consider the perception and propensity of negative impact upon tourism from the negative cumulative impact set out in chapters: • Landscape and Visual • Historic Environment • Traffic and Transport • Air Quality • Noise and Vibration • Socioeconomics, Recreation and Tourism	The Health and Wellbeing assessment considers the impacts on wellbeing and amenity. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** concluded that there are no anticipated significant effects.
First time visitors to Suffolk may be unaware (or be able to distinguish) between different areas of the county. If they are aware of large-scale capital developments in Suffolk, there is the possibility that they will simply assume that Suffolk is "one big building site" and this could result in them going elsewhere. Sizewell is the most high-profile example of a large construction project, but a variety of other construction schemes taking place simultaneously will undoubtedly have a negative effect on Suffolk.	This comment has been noted. The impact on private, community, recreation and tourism assets (including visitors) is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.** Cumulative effects of the Proposed Project are considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
A large amount of Suffolk's appeal to urban visitors is its 'peace and tranquillity. Visit Suffolk's website describes the county as follows: "A county filled with natural beauty situated on the east coast of England, bordered by 50 miles of glorious coastline, and topped with breathtakingly beautiful open skies, it is the perfect holiday and short break destination. Whether you are looking for a quiet 'get away from it all holiday' or one that is full of adrenaline and adventure, Suffolk will not	This comment has been noted. The impact on private, community, recreation and tourism assets is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**

Suffolk County Council Comment	National Grid's Response
disappoint. Here you will discover quaint villages and medieval towns that for centuries have drawn in artists and writers."	
Any large-scale infrastructure works are clearly going to have an impact, or will be presumed to have an impact, on many of these elements. In addition to deterring people from visiting, they may result in a negative experience for people who do come to Suffolk and leave them with a lasting impression that deters them from returning or recommending the county to others.	This comment has been noted. The impact on private, community, recreation and tourism assets (including visitors) is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.** Cumulative effects of the Proposed Project are considered in **Application Document 6.2.2.13 Part 2 Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Similar to many of the points raised above, Suffolk's large open skies are a key selling point, along with Constable Country, beaches, countryside etc. People visiting the county for these may be deterred by the thought of construction hoardings, road closures, cables etc. We live in a world where images count and where everything is instantly shared online via social media. The long-term damage that a single negative image of a building site (for example) can do would be significant.	The impact on private, community, recreation and tourism assets are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**. Receptors that fall outside of the study areas will be considered if it is deemed that significant effects are likely. Effects on landscape and visual receptors are set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
Suffolk is renowned for its scenery and wide-open skies etc. If this is to be impacted by permanent or semi-permanent construction, then mitigation measures will need to be put in place to ensure that adverse effects are kept to a minimum, that any environmental damage to the natural environment is prepared for (e.g. removals of trees, hedgerows etc).	The effects of the Suffolk Onshore Scheme on the landscape character of the study area is set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** This also details embedded mitigation measures to minimise effects on landscape character, including sensitive routeing and siting of infrastructure and temporary works. The removal of vegetation should be referred to within **Application Document 6.10 Arboricultural Impact Assessment.**
A combination of construction traffic and the natural increase in visitor numbers is inevitably going to lead to a greater use of Suffolk's highways and result in delays and diversions. Short-term events such as the Latitude festival at Henham are signposted in advance and local residents have learnt to work around the dates or make alternative arrangements where possible. Similarly longer-term projects such as the Gull Wing Bridge at Lowestoft require significant road closures and diversions. Again, people adapt over time. The problem from a visitor economy point of view is that people will either arrive unaware of this or will be deterred by word of mouth and the perception that Suffolk is "just one big building site." It could require sufficient mitigation/ traffic management measures, plus an effective social media/ media campaign to reassure potential visitors that their trip will not be adversely affected by traffic jams and diversions	This comment has been noted. A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 9: Assessment of Impacts and Likely Significant Effects. An assessment of the potential impacts of construction traffic on the highway network is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** This concludes that there are no anticipated significant effects as a result of the Proposed Project, with the embedded mitigation and control and management measures in place (as set out in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk).**
Abnormal Indivisible Loads have the potential to be slow and disruptive and often require effective media/social media campaigns to warn of delays along the routes used. In cases where vehicles will be using single carriageways or B-roads, there is the possibility of serious disruption and potential damage to natural environment. It could also lead to street furniture/lighting having to be temporarily removed to avoid damage. There is also the possibility of noise, air pollution and long-term damage to road surfaces, all of which will need to be mitigated.	Noted. Details on the likely routes to be used by abnormal loads and the constraints along these routes (including any street furniture which may need to be temporarily removed) are contained within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk.** The abnormal vehicles will be required to follow the abnormal vehicle routing strategy (see **Application Document 6.4.2.7.3 Abnormal Load Routing Plan**). Road condition surveys will be carried out pre-construction, during construction and post-construction, to identify any defects that arise to highways assets/ verges during the construction phase of the Proposed Project and for re-instatement. The assessment within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** considers temporary air quality impacts due to construction vehicle, dust and NRMM emissions during the construction and decommissioning phases of the Proposed Project, please refer to this chapter for further details. The assessment within **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration** covers temporary impacts from noise and vibration during the construction stage, including construction traffic noise and vibration, and the decommissioning phase, please refer to this chapter for further details.

Suffolk County Council Comment	National Grid's Response
	Please also note that a variety of mitigation measures will be employed during the construction phase to minimise and reduce impacts to receptors, refer to **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)** which lists out these measures. This document will be developed into a detailed Onshore Construction Environmental Management Plan (CEMP) in advance of construction commencing.
Large scale infrastructure projects such as this will require accommodation for the workforce. It is unlikely that all labour will be sourced locally. Given that some of this work could be occurring at the same time as the construction of Sizewell C and other large infrastructure projects, this will place an enormous strain on the both the local labour market and the accommodation sector. The latter will be even more pronounced if works are taking place during the peak summer months and could result in visitors being unable to find accommodation.	The impact on the economy, including construction workforce, and private, community, recreation and tourism assets, including accommodation capacity, is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.** Cumulative effects of the Proposed Project are considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects.** The cumulative impact upon accommodation requirements have been covered further at ES.
If works were to take place outside of the main season however, it could extend the opportunities for accommodation providers and increase revenue. Whilst Suffolk benefits from a healthy year-round weekend breaks market, it could be enormously advantageous if accommodation could be occupied during the week by visiting labour etc.	Comment noted.
This would need to be balanced against the negative perception that "all the accommodation is full" because of the capital works (necessitating a "Suffolk is open for business"-type campaign) as well as energy costs. Some self-catering properties are simply not opening over the winter because of prohibitively high heating/ electricity costs. Whilst all year-round demand would be beneficial, providers need to ensure that it is financially viable too. Some providers have concluded that passing the costs onto customers would make the accommodation costs prohibitively high.	The impact on the economy, including construction workforce, and private, community, recreation and tourism assets, including accommodation capacity, is considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
Some businesses will be affected by road closures or diversions. It will require adequate signage and publicity to ensure that businesses are still able to trade effectively and to advertise the fact that businesses are still open.	A complete assessment of socio-economics effects has been undertaken, including an assessment of severance on private, business and community assets. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism** Section 9: Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on businesses as a result of the Proposed Project. The proposed management and mitigation relating to construction traffic is set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan (Outline CTMTP) - Suffolk.**
This requires careful planning and co-operation with contractors to ensure that delivery routes remain open. If delivery times need to change to work around capital works, then this needs to be adequately prepared and communicated. This has the potential to affect the hospitality sector, particularly where food deliveries are concerned and particularly where fresh food is concerned	A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 9: Assessment of Impacts and Likely Significant Effects and concludes that there are no anticipated significant effects on businesses as a result of the Proposed Project. As a result there are no additional mitigation measures proposed. However, as set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 8: Proposed Project Design and Embedded Mitigation, control and management measure GG26 details how members of the community and local businesses will be kept informed regularly of the works through active community liaison.
Worker spend – The catering and hospitality sector could benefit enormously, as could other sectors such as fuel, takeaway/fast food etc. Although this has to be balanced against the change in spending behaviour when compared to visitor spend, if non-home-based labour displaces visitors then SCC expect the applicant to consider this change in spending and mitigate accordingly.	The impacts on the economy, and private, community, recreation and tourism assets are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.** This includes a consideration of additionality. Additionality has been calculated by considering the overall job gains to the area, then factoring in the level of leakage, number of displaced jobs and multiplier effects, such as supply chains and construction worker spending related jobs. These assumptions have been informed by the HCA Additionality Guide

Suffolk County Council Comment	National Grid's Response
SCC considers that this approach to Socioeconomics, Recreation and Tourism is entirely consistent with their experience of infrastructure projects in similar sensitive landscapes where the visitor economy is economically significant.	We are confident that our desk based analysis is sufficiently robust. Our approach and methodology, as set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, remains consistent across infrastructure projects. We have a repertoire of successfully taking infrastructure projects through the application process to commissioning.
When identifying potential impacts as set out in paragraphs 2.11.6.3 – 2.11.6.7 and then in table 2.11.3 SCC expects the applicant to consider these impacts in more granular detail than presented in the scoping opinion. The applicant has grouped together too many sources of impact and therefore will not correctly assess the impact. As a minimum SCC will expect the applicant to consider, separately, the impacts upon the following sources: • Employment – local opportunity • Economic Development – Local investment • Economic Development – Non home based spend • Economic Development – Investor perception • Economic Development – Workforce and churn • Economic Development – Journey time delays (including those that would affect a tourism asset carrying out its day-to-day activities) • Tourism – Visual Impact • Tourism – Visitor perception (East Suffolk as a destination and Aldeburgh, Leiston, Saxmundham & Sizewell area as a destination) • Tourism – Journey time delays (of a visitor to the region the actual and perceived impact) • Tourism – Accommodation displacement.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism** considers potentially significant socio-economic, recreation and tourism effects on the following receptors: • employment (including training and apprenticeship opportunities); • users of recreational routes and Public Rights of Way (PRoW); • local communities that could be affected by community severance; and • residential properties, local businesses, visitor attractions, community facilities, open space and development land. The socio-economics, recreation and tourism assessment considers the construction, operation, maintenance and decommissioning of the Suffolk Onshore Scheme.
SCC disagrees with the applicant on the study areas used in the scoping opinion, the spatial scope for extent of effects for all phases of the project is far greater than the applicant is currently using. SCC expects at any future submission that the applicant uses the following: • Effects on employment and supply chain – bespoke travel to work zones based on the different construction sites using travel to work data to arrive at an informed zone for effects on labour. Worker's willingness to commute is dependent on a number of factors, time, distance, and travel allowances for example, SCC expects the applicant to consider these and set a realistic daily commute zone to assess the potential for home-based workers. This is also applicable to assessing the opportunity for a local supply chain to respond to the opportunities available. • Effects on local businesses, visitor attraction for tourism & tourism businesses – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below) • Effects on development land – informed by visual and acoustic impact zones of all construction sites and the traffic and transport access plan (also inclusion of severance impacts below) • Effects (indirect and direct) on severance – informed by the traffic and transport access plan • Effects of cumulative impact on all of the above especially where construction phases of combined competencies overlap. i.e., where civils phases of construction coincide and have the potential to exhaust the local labour market and temporary accommodation	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism,** Section 6: Study Area presents the socio-economic, recreation and tourism impacts by geographical scale at which each component is assessed, and the rationale behind these geographical scales. Receptors that fall outside of the study areas will be considered if it is deemed that significant effects are likely.
All baseline assumptions (employment and labour market, business premises, visitor attractions, open spaces, and development land) will then have to be revisited to include this new spatial scope.	This comment has been noted.
SCC recognises that when considering this project as a single entity there are minor positive opportunities for economic development and employment, skills, and education. However, SCC expects the applicant to consider all the National Grid plc projects located within Suffolk and develop an approach that encompasses this project as part of their meta project in the region. This will have a transformational approach when considering the positive impacts of the project.	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, presents the socio-economic, recreation and tourism impacts and assesses the economic impacts of the Proposed Project. Please note that **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** considers the outcomes of the core assessment for the Proposed Project alone and then assesses the combined impact alongside other proposed developments within the CEA study area to determine any potential significant inter-project cumulative effects. This includes beneficial impacts relating to regional employment.
SCC expects the applicant to: • Deliver and fund, in collaboration with SCC's and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project. • Work collaboratively with SCCs to	As reported in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, the socio-economic, recreation and tourism assessment assesses the likely significant effects from the construction and operation of the Suffolk Onshore Scheme

Suffolk County Council Comment	National Grid's Response
ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment. • Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people. • Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally • Deliver activities with the aim to increase the size and diversity of the labour market pool • Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes • Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible. • Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region • Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and LMI to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects.	including the creation of construction jobs and jobs within the supply chain. These impacts are considered in Section 10.9 of the ES chapter. National Grid has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level, as this is not considered to be an efficient or effective approach bearing in mind the low number of construction workers anticipated and that National Grid has not identified any likely significant effects in relation to this matter.
16 SCC Emergency Planning Unit	
The location of the construction site(s), some 1km from the Sizewell B power station site, and within the Detailed and Outline Emergency Planning Zones (Pg 21) for Sizewell means that SCC has the statutory duty under REPPIR to consider the development with respect of the existing Sizewell Off Site Emergency Plan.	Noted, no further response required.
This would require an emergency plan for the construction to be produced that covers the arrangements for protecting construction site staff during any Sizewell radiation emergency and ensures that the development does not adversely affect the existing Radiation Emergency Plan which coordinates the response of the Emergency Services and other agencies being able to response to an incident at Sizewell B.	Noted. Sizewell B Power Station was flagged as a COMAH Lower Tier Operator located within 3km of the Proposed Project in the consideration of major accidents and disasters within the EIA Scoping Report. An assessment of Major Accidents and Disasters was scoped out of the EIA on the basis that significant environmental effects were unlikely with processes and standards in place and given the Proposed Project is unlikely to generate any significant effects on the environment if a major accident or disaster were to occur (see Volume 1 Part 5 Project Wide Effects in the EIA Scoping Report). As noted in Appendix 5.2.A of the EIA Scoping Report, the Proposed Project would not lead to any increased risk of a major accident or disaster from a nuclear site. Since the submission of the EIA Scoping Report, the design for the Proposed Project has developed and the Order Limits have changed such that they are no longer in close proximity to Sizewell A or Sizewell B. See **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for further details. As per **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments**, an Incident Response Plan will be developed for the construction phase which will outline procedures that will be implemented in case of unplanned events. National Grid will engage with other businesses and developers operating in the area and will seek to engage with the local emergency services in order to discuss and understand any matters of

Suffolk County Council Comment	National Grid's Response
	concern, including any relating to emergency planning. National Grid has engaged extensively with the County Council and is seeking further collaborative engagement with blue light service providers.
The situation is likely further complicated with the likely imminent commencement of the Sizewell C construction project.	Noted, no further response required.
17 SCC Lead Local Flood Authority (LLFA)	
Impacts could be upon multiple receptors; these receptors should not just be limited to the environment but should also include people and property. Whilst receptors are included in the assessment, there is no explanation as to how these receptors were selected and why others, such as people and property, were excluded.	As detailed in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment,** people and existing property and infrastructure are included where there is potential for the project to affect these receptors.
It is assumed that 'Water Environment' will cover both Flood Risk and Drainage.	This assumption is correct.
'Hydrogeology' sits in a separate chapter to 'Water Environment,' any assessment of groundwater flood risk should be undertaken alongside other sources of flood risk	Noted. Groundwater as a source of flood risk is assessed within **Application Document 6.8 Flood Risk Assessment** that accompanies the ES.
2.5.4.1 – These sources of information are not appropriate for assessment in the Friston catchment due to the significant consented works that will change the current baseline	Information on other consented works in the local drainage catchment of Friston has been collected and reviewed to inform **Application Document 6.8 Flood Risk Assessment** that has been prepared.
2.5.2.9 – Any relevant information from local guidance such as Suffolk Flood Risk Management Strategy Appendix A should also be considered, especially when developing mitigation	Noted, relevant published guidance will be reviewed to inform the FRA (see **Application Document 6.8 Flood Risk Assessment**) and water environment assessments.
2.5.6 – Assess construction impacts for cable corridor but no specific reference to impacts from converter station sites and Friston	Noted, these aspects of the Proposed Project are now considered with the FRA that is contained within **Application Document 6.8 Flood Risk Assessment** of the DCO application. For further details on the Proposed Project design please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**
2.5.6.11 – Creation of temporary impermeable areas for construction activities, which will require additional mitigation above and beyond that required for operational infrastructure.	Noted, this aspect of the Project is considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment).**
Need to consider impact of increased flood risk from temporary and permanent impermeable areas	Noted, these aspects of the Project are now considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment).**
Need to consider cumulative impact of pollution (silt) and the risk of this to cause blockage, combined with increase in flood risk (as point above)	This aspect has been considered within the FRA (see **Application Document 6.8 Flood Risk Assessment**) and commitments to avoid increases in flood risk have been secured within the application.
Construction and decommissioning	No response required
Need to consider impacts on surface water overland flow paths (not just floodplain) and subsequent potential to increase offsite flood risk	Noted, these aspects of the Project are considered within the Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**).

Suffolk County Council Comment	National Grid's Response
Flood risk should be scoped in for Friston due to the historic and existing flood risk. Cannot comment on other sites as no assessment of surface water flood risk has been undertaken but if there is the potential to interact with existing surface water flow paths then this should be scoped in	The flood sensitivity of Friston is noted, due to the history of surface water flooding incidents. The Flood Risk Assessment (see **Application Document 6.8 Flood Risk Assessment**) assesses surface water flood risk and identifies management and mitigation requirements to ensure the project does not increase off site flood risk in any location from any source.
Receptors are only environment. Potential for silt to enter watercourses and reduce capacity/cause blockages, and subsequent impact on people and property should also be assessed	As detailed in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**, people and existing property and infrastructure are included where there is potential for the Proposed Project to affect these receptors.
Interception/diversion of surface water overland flow paths no included as an impact pathway, but should be, and should be scoped in	This aspect has been considered with the FRA (see **Application Document 6.8 Flood Risk Assessment**) and mitigation to reduce and mitigate effects have been secured within the application.
Data sources not appropriate in Friston catchment due to consented works	Information on other consented works in the local drainage catchment of Friston have been collected and reviewed to inform the FRA that has been prepared (see **Application Document 6.8 Flood Risk Assessment**).
Justify choice of receptors and lack of people/property	As detailed in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**, people and existing property and infrastructure are included where there is potential for the project to affect these receptors.
Temporary increase in runoff included in this table but I did not see this specifically in previous tables	Noted, no further response required.
It needs to be identified and agreed by SCC what return periods will be considered for mitigation of both construction and operational impacts as this will influence the likelihood, severity and ultimately risk rating of residual risks.	The Proposed Project has regularly engaged with Suffolk CC in their role as LLFA to shape the drainage strategy and to agree key design principles and standards.
Stating what mitigation could be used for identified impacts is acceptable at a high level, but there will need to be a demonstration that this mitigation is deliverable within the Order Limits as part of/prior to Examination.	Noted. This is demonstrated within **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** and supporting documents.
18 SCC Highways	
Suffolk County Council will be the local Highway authority for the area impacted for those locations being considered for the northern onshore landing and its associated infrastructure for the Sea Link project. There are numerous challenges relating to access to the sites and as a result the potential for significant impacts on local communities of construction traffic.	Noted, no further response required.
At Paragraph 2.1.7.10 of the EIA Scoping Report it is stated the option area F and E have good access to the strategic highway network. SCC does not consider this is an accurate statement as the nearest strategic road is the A14 near Ipswich. This is also true of statements made with regard to convertor site 1 (2.1.8.7) site 2 (2.1.8.8)	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** are clear on the distinction that the nearest access point to the strategic road network (SRN) is the Seven Hills Interchange, notwithstanding that the A12 remains a significant route in the local area and is in proximity to the order limits.
The A12 between the A14 Seven Hills interchange and A47 Bascule Bridge at Lowestoft is part of SCC's major road network and is not part of the strategic roads network nor a trunk road as assumed in 2.8.4.2.	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** are clear on the distinction that the nearest access point to the SRN is the Seven Hills Interchange, notwithstanding that the A12 remains a significant route in the local area and is in proximity to the order limits.
The degree of traffic generated at ports for construction and operation of the marine cable route is unclear. If evidence is not provided to scoping out of these impacts and recognising that the selection of a port is unlikely to be possible at this stage, it may be necessary to include a Port Traffic Management Plan similar to that secured for EA1(N) and EA2.	Impacts to Shipping and Navigation is presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation** with a full Navigational Risk Assessment presented in **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment.**

Suffolk County Council Comment	National Grid's Response
Paragraph 1.5.26 refers to the assessment as a realistic worst-case scenario, and SCC believe this should be reflected in the management, controls and monitoring processes that are put in place for the project.	Noted and confirmed that this approach is taken through the assessment within the **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Paragraph 1.5.4.6 includes reference to impact duration. SCC are concerned that whilst some impacts are short term, they need to be seen in the context of other short term contiguous impacts in the local area. For example, repeated road closures and traffic management affecting journey times and repeated increases in HGV movements on rural roads.	The matter of potential road closures is addressed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk.**
Reference is made to intra project effects at section 1.5.5. Consideration needs to be given to the relationship between impacts on Public Rights of Way (PRoW) and impacts on vulnerable road users on the highway network i.e. total impacts on severance, amenity, and delay. This means the proximity of receptors on PRoW need to be consider with regards to impacts on the highway network.	This matter is addressed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.** The **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** provides a framework for the mitigation of PRoW impacts.
For inter project effects, the Applicant will be aware of the scale and number of projects in the area, and consideration needs to be given to the range of potential impacts as project programmes crossover, including the presence and absence of relevant mitigations. For highways, the area of significant impact can be wide and impacts as a result of HGV movements will be felt on communities along the A12, which needs to be considered as part of the assessment. SCC would recommend discussions on how these projects are treated, especially given the level of complexity in the number of potential scenarios.	A cumulative assessment has been undertaken. This is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Chapter 2.8 sets out the details on the assessment of traffic and transport. Section 2.8.2.3 includes reference to the National Policy Statement EN-1, a number of paragraphs are quoted. The Applicant should also fully consider the following paragraphs of: • Paragraph 5.13.9: "The IPC should have regard to the cost effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures." • Paragraph 5.13.10: "water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective." • Paragraph 5.13.11: "The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that: o control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements. o make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on street HGV parking in normal operating conditions; and o ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force."	Noted and acknowledged.
The Draft National Policy Statement for Electricity Networks Infrastructure (EN5) also includes the following statement at paragraph 2.8.1: "When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the Applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.5) with recognition that the linear nature of electricity networks infrastructure allows excellent opportunities to: i) reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii) connect people to the environment, for instance via footpaths and cycleways constructed in tandem with biodiversity enhancements."	Noted and acknowledged.
The Applicant should consider the opportunities that the development offers regarding green corridors and sustainable transport.	Measures to promote sustainable travel for construction workers are set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk**. Details of proposed management and mitigation relating to walking and cycling routes including Public Rights of Way (PRoW) are also set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan (Outline PRoWMP) - Suffolk.**

Suffolk County Council Comment	National Grid's Response
SCC welcomes the commitment at Paragraph 2.8.3.3 that the proposed study area will be subject to discussions with us and would be keen to reach agreement on this issue as early as possible. However, SCC could only confirm agreement on the scope of the assessment once further details on vehicle numbers and routeing were provided by the Applicant. When looking at those roads included at Paragraph 2.8.3, SCC consider that the following should be included:	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
A1094 between the A12 at Friday Street, Benhall and Church Common • B1069 Church Road through Snape, Tunstall and the A1152 through Eyke to the A12 at Woods Lane Roundabout • B1121 and B1119 through Saxmundham including the junctions with the A12 • B1119 between Saxmundham and Leiston • B1122 between the A12 and Leiston • B1125 between A12 and B1122	Noted, no further response required.
The assessment should also identify the impacts on the A12 between the A14 Seven Hills east of Ipswich and the A47 Bascule Bridge in Lowestoft; this is of particular concern given cumulative impacts with other projects along the corridor as evidenced at other recent DCOs.	Noted, no further response required.
A list of key junctions has been provided at Paragraph 2.8.3.5. SCC is unsure why these junctions have specifically been identified, and SCC consider that the following should be included: • A12 / A1094 Friday Street junction, Benhall • A12 / B1122 junction, Yoxford • A12 / B1121 junction (Benhall) • A12/ B1121 junction (Kelsale) • A12 / B1119 junction, Rendham • B1121/ B1121 junction, Benhall • B1122 / B1125 junction, Theberton • B1119 / B1122 junction at Leiston • B1121 / B1119 junction at Saxmundham • Both junctions of the A1094 with the B1069 (Snape / Friston) • B1119 / Bucklewood Lane junction, Leiston	Noted, no further response required.
However, the final list may change dependent on location of the landfalls, cable corridors and convertor stations and as the quantity of traffic becomes clearer. The same is true for the scope of the PRoW that will need to be considered.	Noted, no further response required.
The geographical scope of the Traffic and Transport Study Area should remain flexible so that as more detailed information is made available, for example the sources of aggregates, the assessments limits can then be expanded or contracted as appropriate.	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
No details are provided on the extent or location of traffic surveys. This should be agreed with SCC prior to undertaking any surveys to avoid extraneous work.	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
The number of schemes in the area makes undertaking future year assessments particularly complex, and so it is recommended this is agreed with the local authorities at an early stage and may require numerous scenarios to be tested	Cumulative assessment was discussed with SCC at transport thematic meetings, and is set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
As set out at points TT01 and TT02 of paragraph 2.8.5.6, SCC strongly supports the inclusion of controls, monitoring, enforcement, and reporting for construction vehicle movements. This is considered of critical importance for determining the acceptability of the environmental assessment, and so the measures and methods should be agreed at as early a stage as possible. The management measures proposed cover HGV movements and routing, but also need to consider HGV peak hour movements, workforce movements and mode share, and AILs.	Measures to manage and control construction traffic movements are set out within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**

Suffolk County Council Comment	National Grid's Response
Further information is sought on the details around construction working hours and therefore hours of traffic movement, as well as shift patterns, to be reflected in relevant controls.	This is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Where impacts are mitigated through measures included within management documents limiting values, the measurement and enforcement methodology should be clearly explained as should the relationship between such plans and requirements included within the dDCO. The enforcing authority should also be clear. SCC would usually expect to be the authority discharging transport related requirements or management plans.	Measures to manage and control construction traffic movements are set out within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Paragraph 2.8.6.5 states that the construction phase will be the focus of the assessment of transport effects. Whilst SCC agrees with the principle that the greatest effects are likely to be seen during this period, details of the operational and decommissioning phases, as indicated at paragraph 2.8.6.6, should be provided, including likely vehicle numbers and potential AIL movements. There is particular concern around access and maintenance (paragraph 2.8.6.14) during these periods, and the requirement for construction vehicles as a result. Therefore, until further details are provided, SCC requests that maintenance activities remain in the scope of assessment. Specific concerns are access routes for HGVs and AILs during the operational phase given the remote location of many of the sites. Given the uncertainties around conditions for future assessment, a commitment to a decommissioning plan to be agreed with the relevant authorities will be needed within the DCO.	This is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Typically, a number of operations such as ground investigation, archaeology and site clearance are considered as pre commencement works in advance of commencement that typically triggers the measures within management plans. SCC would expect either sufficient evidence to show that impacts of precommencement activities are minimal or that a separate management plan is provided, as was secured for EA1(N) and EA2.	Noted, no further response required.
Accepting that it is difficult to quantify impacts of decommissioning so far in the future consideration could be given to including a requirement to assess these impacts at the relevant time	As stated within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport,** the decommissioning phase is considered to be too far into the future to be able to accurately predict traffic flows at that time.
SCC welcome the breakdown of vehicle types as indicated at paragraph 2.8.6.11 and would expect this breakdown to be understood for the phasing of the project, including at each access. The breakdown should include AIL movements.	The breakdown of vehicle types, including AILs, is set out within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
The definition of vehicle types, particularly HGVs, should be clearly explained in any assessment.	This is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**.
The Applicant will need to include additional traffic survey locations to reflect those additional locations to the scope of assessment, as per the above. The Applicant will need to include daily traffic surveys, which will inform the hour of greatest change, as well as peak hour, and SCC welcomes seeking agreement on this scope as per Paragraph 2.8.7.2 and would recommend that traffic surveys are not undertaken until these details are agreed.	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
The geographical scope of traffic surveys should also be agreed with SCC as it currently omits the A12 corridor. Dependent on progress of consented NSIP sites data may be available from monitoring associated with these schemes.	Noted. The proposed study area for the traffic surveys and assessment within the ES has been agreed with SCC as part of the transport thematic meetings.
It is likely that speed data may be needed for the proposed access locations to determine visibility requirements and so surveys should be included, as necessary. Care will need to be applied to selecting peak hours for assessment noting that these consented schemes include transport plans that offset construction traffic peaks from baseline peaks.	The visibility for access designs has been informed by speed data.

Suffolk County Council Comment	National Grid's Response
As per Paragraph 2.8.7.5, SCC would welcome discussions around the scope of the transport assessment.	Noted. The scope for the Transport Assessment Note has been agreed with SCC as part of the transport thematic meetings.
SCC notes that the Applicant plans to use the Guidelines for the Environmental Assessment of Road Traffic (GEART) Methodology. Applying either GEART, sometimes supplemented by DMRB document LA112, methodology in the assessment of transport in recent DCOs has, in the authority's opinion, required greater flexibility in the approach particularly in terms of sensitivity of receptors and application of thresholds to reflect local circumstances. The thresholds within the document are not designed to be applied rigidly, and consideration needs to be undertaken of the local population. Through the DCO for Sizewell C, and EA1N, the sensitivity of links for the surrounding area was largely agreed, and this offers a comprehensive starting point.	The assessment as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** is based on the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement 2023
Clarity is sought on paragraph 2.8.7.8, which states that it is proposed to assess links where traffic flows are expected to increase by 30%. This should clarify that this includes the proportional change in HGV movements as well as general traffic noting that the cumulative impact of consented and developing NSIPs complicates such assessment. It should also clarify the timescales for which the changes are being assessed, which should include the following as per the Guidelines: • Hour of greatest change • Peak hour. • Daily.	Confirmed that where significant effects are identified at above 30% increase in traffic flow, this threshold applies to HGVs as well as overall traffic flows.
As per the above, the consideration of affected parties at paragraph 2.8.7.13 and 14 could be supplemented, but not superseded, by LA 112, which provides some potential additional considerations.	The assessment as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** is based on the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement 2023.
As data collection and forecast assumptions have a degree of uncertainty some flexibility should be applied to the use of the GEART thresholds, and they should not be taken as absolute values.	The assessment as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** is based on the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement 2023.
Paragraph 2.8.16 sets out that a 'simple gravity model' will be developed for the workforce origins. SCC currently disagrees with this approach. SCC is of the opinion that there is significant risk in this approach given the number of large infrastructure projects in the area and therefore the availability of a local workforce depending on which project comes forward and when. It is considered that substantial consideration needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact. It is also noted that paragraph 2.11.7.11 sets out an estimated workforce and that a 'proportion of workers are likely to live locally to the site,' which will need to be robustly evidenced. Any assumptions around workforce origins within the socio-economic assessment should be agreed and reflected in the assessment of transport impacts.	The forecast trip distribution of construction staff vehicles has been based on a simple gravity model which has been developed based on 2021 Census data for construction workers living within a 60-minute catchment area of the site. Whilst it is acknowledged that the dataset was collected during the COVID-19 pandemic, this represents the latest information currently available (as opposed to using information from the 2011 Census) and is considered to be appropriate for identifying the districts where construction workers may live. Note, the gravity model has only been used to derive a forecast trip distribution, so that potential impacts associated with construction staff travelling to/ from the Proposed Project can be assessed. This approach was agreed with SCC Highways during the transport scoping meeting held in June 2023, as documented in **Application Document 6.2.2.7.B Appendix 2.7.B Traffic and Transport Scoping and Thematic Meeting Minutes.** Detail regarding construction workforce availability is included and assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism**, Section 9: Assessment of Impacts and Likely Significant Effects and in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects.**
Within 2.8.7.13 the IEMA list of affected parties is listed. A significant feature of East Suffolk is the importance of tourism and recreational use of highways and PRoW in the area, not necessarily focused on a specific site.	The potential effects of construction traffic on tourists, visitor attractions and other businesses are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**.
SCC would expect to be provided with any data that is informing the forecast traffic profile as per Paragraph 2.8.7.18, and that these forecasts would be reflected in the management measures set out within the CTMP.	The traffic survey results are set out within the assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** The results are reflected within the measures in **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
It is noted that under construction and decommissioning: results in PRoW diversions and closures that these impacts are scoped out for road links and junction. There may be a misunderstanding by	As set out in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk,** diversion routes are set out and these do not include existing highways.

Suffolk County Council Comment	National Grid's Response
what this means but for clarity SCC would expect that if PRoW diversions used roads as a diversion route that there will be impacts for PRoW, national and regional walking and cycle routes and Road users	
The scope of the Transport Assessment should include details on the access arrangements including drawings showing vehicle swept paths and visibility splays that would be appropriate for a planning submission.	Access arrangements and swept paths are included within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
Depending on the assessed impacts, junction modelling may be required, as was undertaken for EA1N and EA2; however, it is recognised that this would be determined by future work.	Any requirement for junction modelling has been reviewed within **Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note.**
If any abnormal loads use SCC maintained roads the authority would require structural assessments in addition to swept path analysis. As noted above SCC considers that sufficient infrastructure should be provided to allow access to substation and converter sites in the area both during construction and the operational phases considering that the proposed locations are not well served by transport connections.	Noted. Details on the likely routes to be used by abnormal loads and the constraints along these routes are contained within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk.** It is expected that the contractor will review all access constraints in more detail at a later stage and carry out any additional assessments (including structural assessments) where necessary. Alternative routes or temporary works will also be used if necessary.
Table 2.8.7 provides an indication of the proposed method for determining sensitivity of receptors. SCC does not disagree with the approach in principle, albeit further consideration would be needed when looking at specific locations, especially when defining sensitive users and the need for crossing roads to access facilities. Consideration is also needed over the quality of the existing vulnerable road user infrastructure e.g. width of footways and presence of crossing facilities. Wherever possible sensitivity should be based on evidence rather than just professional judgement.	Noted and agreed.
Paragraph 2.8.7.22 sets out that it is proposed to scope out impacts on the railway network given the use of trenchless methods. Whilst it is noted that the line provides services access to Sizewell. It will be of critical importance to the Sizewell C materials strategy, and any potential disruption to this strategy is considered unacceptable by SCC.	Noted. No disruption to the Sizewell materials strategy is proposed.
SCC makes the following comments for each of the proposed assessments of magnitude: • Severance: DMRB Volume 11, Section 3 Part 8 has been superseded by LA 112. LA 112 is not considered by SCC an appropriate document for basing an assessment for changes in severance as a result of construction traffic. • Pedestrian Delay: Further information is sought on how the relative change in delay will be assessed. • Pedestrian and Cycle Amenity: It is recognised that the thresholds suggested are 'tentative' and so should be treated as such. • Fear and Intimidation: SCC welcomes consideration on a case-by case basis but would caution overreliance on professional judgement without supporting evidence. In the rural areas of Suffolk, a key factor is considered to be the general absence, or limited width, of footways along many roads. • Driver Delay: It is noted that there may be limited changes, but given the numerous projects in the area, the Applicant should be mindful of the potential for cumulative impacts. Delay may also occur due to traffic management measures implemented by this or other NSIP projects. • Highway Safety: Consideration should be given to whether the most recent five years is the most appropriate dataset given changes in travel patterns during and post the Pandemic.	Noted, the assessment methodology, that applies IEMA Guidelines, is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** Highway safety is also addressed within **Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note.**
The thresholds provided at Table 2.8.8, whilst indicative and providing a helpful starting point should not be treated as absolutes given the varying characteristics of locations and that proportional differences can be very different if the baselines are different.	Noted, the assessment carried out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** allows for added flexibility and/or further consideration of certain types of impacts when compared to the thresholds identified by the recently adopted (June 2023) IEMA Guidelines for the Environmental Assessment of Traffic and Movement.
Paragraph 2.8.7.38 includes reference that 'residual effects will be reported taking into account professional judgment on the duration over which effects are likely to be experienced.' Whilst it is recognised that professional judgment is required for the assessment, SCC would recommend that	As set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, it is identified within DMRB LA 104 (Ref. 8.4.4), that duration (long or short term), permanence (permanent or temporary) and reversibility should be considered when assessing the overall

Suffolk County Council Comment	National Grid's Response
where impacts are dismissed due to being short term, this is based on evidence. SCC is also particularly concerned about the potential for repeated 'short-term' effects on local communities associated with the number of projects in the area, and the Applicant should consider this as part of their cumulative assessment.	significance of residual effects. The potential for cumulative impacts are noted and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
SSC's position is that the impacts on PRoW are a topic in their own right and should not be considered in others such as landscape and social economics and tourism. To do so makes assessment fragmentary and will not reflect the true impact on users of the PRoW network	National Grid acknowledges the concern raised by SCC and has been in touch directly regarding this matter. It is proposed to continue to assess Public Rights of Way (PRoW), following established practice in Environmental Impact Assessment (EIA). It is not conventional for an Environmental Statement (ES) to have its own PRoW topic chapter. It is recognised that Sizewell C has a separate Amenity and Recreation chapter focusing on PRoWs, but it is noted that most other local EIA schemes in Suffolk (EA1, EA TWO, EA1 N and BTNO) also adopt the same approach as the Sea Link EIA. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a PRoW chapter it would risk double counting of effects already being reported somewhere else in the ES. It is our view that the structure of the ES as proposed allows for a full assessment of all potential impacts on PRoWs where there is the potential for significant environmental effects. Across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments the aspects mentioned by SCC will be covered. The concern that when considered individually, that an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, could be significant will be addressed within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects** which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters. Importantly, it is not felt that a separate PRoW topic would result in any difference in the outcome of the assessment of overall impacts on PRoWs, and the required mitigation. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** has been prepared which provides details of PRoW closures and diversions. The proposed management and mitigation relating to Public Rights of Way (PRoW) is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk**. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** 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. Continued liaison with SCC on this topic is ongoing.
19 SCC Landscape and Visual	
The approach to scoping set out in 2.2.1, does not explicitly recognise the relationships between landscape and visual matters and other parts of the EIA, specifically ecology, historic environment, socioeconomics and tourism and traffic and transport. SCC considers that to ensure a comprehensive assessment of landscape and visual effects the relationships between this chapter and other matters in the EIA should be clearly recognised. It is notable that such relationships are explicitly recognised in the scoping for the East Anglian GREEN project, also promoted by National Grid Electricity Transmissions (NGET).	The Landscape and Visual Impact Assessment, set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual,** has been produced in collaboration with other disciplines. This has been achieved since the Proposed Project Inception and a collaborative approach from all disciplines has informed the routeing and siting of the Scheme as well as the mitigation design.
The relevant data sources proposed appear to be appropriate and largely comprehensive. However, in addition SCC would also recommend reference to the Designation History Series, as it relates to	The Designation History Series has been referred to within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**

Suffolk County Council Comment	National Grid's Response
the Suffolk Coast and Heaths AONB1 . This has informed consideration of other large scale energy infrastructure projects on the Suffolk coast.	
In addition, the applicant should be aware of the cultural importance and sensitivity of the Suffolk coast, including the Aldeburgh/Snape area. A detailed overview of these issues is provided in the introductory material of the Suffolk, Norfolk, and North Essex Seascape Character Assessment2 and reference should be made to this.	The relevant information, including reference to cultural importance, within the Suffolk, Norfolk, and North Essex Seascape Character Assessment has been referred to within the landscape baseline. Further information on cultural matters should be referred to within **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage.**
Initial proposals for representative viewpoints are set out on pages 26 and 37 of the scoping report and shown in Figures 2.2.9 (Site 1) and 2.2.10 (Site 3).	This comment is no longer relevant as there are no longer Converter Station option sites.
SCC notes that the same set of viewpoints has been used for both Site 1 and Site 3 and the various options. The results in some viewpoints being located outside the ZTVs for one or both sites and/or in slightly odd locations (e.g. VP8), although for each site and its options, several viewpoints are then omitted from the tables. While the intention may have been to streamline the viewpoints, Figures 2.2.9 and 2.2.10 become more difficult to read and interpret.	This comment is no longer relevant as there are no longer Converter Station option sites.
For the purposes of clarity, each proposal option should have its own figure, showing only the viewpoints relevant to this option. By doing this it is likely to become more evident that, while there may be some overlap, the different options will require individual sets of representative viewpoints.	This comment is no longer relevant as there are no longer Converter Station option sites.
SCC reserves the right to request additional viewpoints, or revised viewpoints, to support the final EIA that will be submitted with the DCO application.	Representative viewpoints have been discussed regularly at landscape and visual thematic meetings and additional meetings with SCC landscape and other stakeholders. This has included the addition of new viewpoints since the production of the Preliminary Environmental Information Report. The representative viewpoint selection should be referred to within **Application Document 6.4.2.1.7 Part 2 Suffolk Chapter 1 Representative Viewpoint Locations.**
The scoping document only appears to consider representative viewpoints. Given the scale and sensitivity of the project on its own, and in combination with other projects, and given the very high level of public interest, SCC considers it is also necessary to include both specific viewpoints and illustrative viewpoints, as discussed in paragraph 6.19 of GLIVIA 3. Finally, Specific viewpoints may be required to understand impacts on specific heritage assets, which is a matter outside the scope of the LVIA.	The representative viewpoint selection should be referred to within **Application Document 6.4.2.1.7 Part 2 Suffolk Chapter 1 Representative Viewpoint Locations and Visualisations** should be referred to within **Application Document 6.4.2.1.10 Part 2 Suffolk Chapter 1 Representative Viewpoint Visualisations.**
SCC would expect that the applicant would provide, as soon as is reasonably practicable, a detailed methodology and rationale for the preparation of visualisations, be that photomontages, wire frame, or annotated viewpoint photography. The latter may be helpful and important in promoting wider public understanding of the project, and its anticipated effects. Agreement on methodology, with the relevant local authorities, supported with sample pages for each visualisation type, would be expected prior to the preparation of the visualisations.	The methodology for the preparation of the visualisations has been discussed during landscape and visual thematic meetings with stakeholders and shared. This should be referred to at **Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology.**
A further important aspect of the visualisations will be the realistic representation of any proposed mitigation planting, and its effectiveness. Therefore, both the representation of future mitigation planting, and the anticipated growth rates of that planting, should be agreed with the relevant local authorities and other relevant consultees, prior to preparation of any visualisations.	Planting heights have been discussed with stakeholders in various thematic meetings, including the February and April 2024 meetings. Arboricultural specialists have prepared a report to evidence the growth rates and information has been provided by East Suffolk Council, both of which have been used to inform the planting heights as shown within the year 15 visualisations, included at: **Application Document 6.4.2.1.10 Part 2 Suffolk Chapter 1 Representative Viewpoint Visualisations.**
2.2.5.4 (LV02) is noted, an Arboriculture Strategy will be required, for review by the relevant officers at East Suffolk Council.	Trees and the development proposals are considered within **Application Document 6.10 Arboricultural Impact Assessment.**

Suffolk County Council Comment	National Grid's Response
However, based on the experience of similar projects elsewhere in Suffolk, a comprehensive approach to important hedgerows under the Hedgerow Regulations 1997 will also be required. This should identify all hedgerows along the routes that are important under the various historic and designation related criteria, in addition to the ecological matters under the regulations as set out in Section 3 and Schedule 1 of the regulations.	The DCO application includes the following plans - Hedgerows to be Removed or Management Plans - Suffolk (**Application Document 2.12.1**) and Hedgerows to be Removed or Management Plans - Kent (**Application Document 2.12.2**). An assessment of Important Hedgerows, including the results of a hedgerow survey assessment against the Hedgerow Regulations has been undertaken and the outputs can be found in **Application Document 6.3.2.2.A Appendix 2.2.A Extended Phase 1 Habitat Survey Report**).
Furthermore, all hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration, as well as mitigation for the adverse ecological impacts caused by their temporary loss as mature features in the landscape.	The DCO application includes the following plans - Hedgerows to be Removed or Management Plans - Suffolk (**Application Document 2.12.1**) and Hedgerows to be Removed or Management Plans - Kent **(Application Document 2.12.2**). An assessment of Important Hedgerows, including the results of a hedgerow survey assessment against the Hedgerow Regulations has been undertaken and the outputs can be found in **Application Document 6.3.2.2.A Appendix 2.2.A Phase 1 Habitat Survey Report.**
Additional impacts are also anticipated due to the creation of construction access and laydown areas, so these areas will also need to be considered.	Trees and the development proposals are considered within **Application Document 6.10 Arboricultural Impact Assessment.**
These should include loss of vegetation.	Anticipated tree loss is shown within **Application Document 6.10 Arboricultural Impact Assessment.**
There appears to be an inconsistency in the approach to this matter. Operational Lighting is scoped in for all emerging preferences and alternative options (vol. 1 part 2 p124) in relation to ecology, whereas it is scoped out for landscape and visual amenity (p43). SCC considers this is neither appropriate nor consistent and converter station lighting should be scoped in for landscape and visual amenity	Lighting design is referred to within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The Landscape and Visual Impact Assessment including lighting in the assessment of the Suffolk Onshore Scheme on both landscape and visual receptors, included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
Whilst acknowledging the current attempts by National Grid Ventures to seek a connection point for the Nautilus project at the Isle of Grain3 , SCC considers that it is still a reasonably likely worst-case scenario that three DC interconnectors will link to the transmission network at Friston. Therefore, it will be essential for all parties involved to collaborate in the effective redesign of the Friston masterplan4 , that supported the application proposals for East Anglia 1 North and East Anglia 2.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
It is anticipated this collaboration will have an impact on the discharge of detailed design requirements for those two wind farm projects, in that location, including engagement with communities on detailed design matters, as specified in those consents. SCC recognises that East Suffolk Council generally takes the lead on these matters as the discharging authority.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
It is welcome that permanent alteration to landscape character of the AONB is scoped in (p50) for operation, although the applicant's initial position is that harm will be less than significant. However,	The effects of the Suffolk Onshore Scheme on the Suffolk and Coasts AONB, including the setting, is included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**

Suffolk County Council Comment	National Grid's Response
SCC considers it essential, based on current information, that the cumulative impact (both landscape and visual) of three converter stations located at Site 1 should be assessed.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
It is noted that potential effects on the AONB have been scoped out entirely for the operation of Site 3 (p53) as it has been identified that there is no potential for effects on the setting of the designation.	The effects of the Suffolk Onshore Scheme on the Suffolk and Coasts AONB, including the setting, is included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
The LVIA methodology provided in 2.2.7 is broadly acceptable. However, the following points should be considered: i. 2.2.7.1 data sources should include published seascape assessments. ii. It is noted that Table 2.2.12 refers to the condition of a landscape as a criterion to assess its value, which is welcome. SCC agrees that the assessment should specifically consider the value of all landscape affected by the proposals in relation to landscape characteristic features, in addition to any national or local designation. iii. 2.2.7.16 / 2.2.7.18 Magnitude of effect refers to Part 1, Chapter 5, EIA Approach and Methodology for the definition of short, medium, and long-term effects; however, this does not appear to have been provided. The main differentiation found was between temporary and permanent effects (Part 1, 1.5.3.7). SCC considers that a clear definition of short, medium, and long term is essential for the assessment of effects and proposed mitigation and should be provided for the purposes of LVIA. The relationship of these definitions to the terms temporary and permanent should also be defined. iv. It is welcome that level of effects of moderate or above will be generally considered significant. However, SCC considers that even a partial loss of characteristic landscape features may result in moderate adverse effects (or above), if the landscape in question is in good or very good condition and presents many or all, of the relevant characteristic landscape features and would ask that Table 2.2.16 be revised accordingly.	Seascape assessment is included within the landscape baseline, which should be referred to within **Application Document 6.3.2.1.B Appendix 2.1.B Landscape Baseline.** Comment noted regarding landscape condition. The duration of time for short, medium and long-term effects are set out within **Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology.** There is a distinct difference between the non-significant minor adverse effect which states that 'characteristic features' would be partially lost, whereas the significant moderate adverse effect and major adverse effects note that 'valued characteristic' features would either be largely or wholly lost as a result of the Scheme. There is a difference between characteristic features that are lost, such as a hedgerow which may be typical in that landscape, compared with a hedgerow that forms part of a historic landscape feature, which we may consider is a 'valued characteristic' feature in such landscape. As such, we feel that this distinction for a non-significant effect and significant effect is sufficient. It is important to note that the assessment methodology descriptors are there as a guide and the assessment of effects within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** are supported by descriptive text to explain the effect attributed.
20 SCC Public Rights of Way	
The NPPF refers to the Public Rights of Way network specifically:	Noted, no further response required.
100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	A complete assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 9: Assessment of Impacts and Likely Significant Effects. The socio-economic,

Suffolk County Council Comment	National Grid's Response
	recreation and tourism assessment assesses the likely significant effects from the construction and operation of the Suffolk Onshore Scheme on Public Rights of Way (PRoW) and recreational routes. It is concluded that there are no anticipated significant effects on PRoW or recreational routes as a result of the Proposed Project. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project.
Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out SCC's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "Seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils, and partnership working."	This comment has been noted. This guidance document has been considered in the preparation of the ES. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism.**
SCC will expect enhancements to the network in addition to mitigation, compensation, and management strategies that will ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.	The opportunities for recreation have been developed in collaboration with key disciplines including traffic and transport, Landscape and Visual and socio-economics (further details within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, and **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**). This has included a permanent PRoW diversion on the converter station site which has been designed to have a variety of experiences with some sections more open and others adjacent to woodland planting to aid screening of views towards the Suffolk Onshore Scheme. This has also included the provision of open access areas, as requested through stakeholder feedback. The existing footpath connecting southwards is shown on **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk.** Regular discussions have taken place prior to submission of the DCO application with the County Council PRoW team. Impacts on PRoW have been assessed, with appropriate mitigation set out where required within the design and as reported within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** An Outline Public Rights of Way Management Plan for Suffolk (see **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk**) has been prepared which provides details of PRoW closures and diversions.
The EIA does not holistically consider how the potentially significant effects that may arise from construction and operation on the public rights of way & access network and its amenity value, will be assessed. The access network includes public rights of way, permissive access, open access land and promoted routes.	A separate PRoW ES chapter has not been prepared, given that PRoW are considered across multiple chapters and details relating to management/ mitigation are set out in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.** As part of the socio-economics thematic meetings, the assessment approach to PRoWs has been discussed and agreed with stakeholders, and will consider the quality of user experience. We are confident that our desk based approach is sufficiently robust and incorporates best practice methodology used on comparable DCO schemes. For further details please refer to **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**. Amenity effects arising from changes in noise, air quality, transport and visual have been considered in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing.**
The assessment considers aspects of this access network within the assessments for landscape & visual, traffic and transport, socioeconomics, recreation and tourism, noise, air quality and health & wellbeing.	Noted, no further response required.

Suffolk County Council Comment	National Grid's Response
This potentially gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. A walker, cyclist or horse rider using a public right of way or on open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.	National Grid acknowledges the concern raised by SCC and has been in touch directly regarding this matter ahead of DCO submission. It is proposed to continue to assess Public Rights of Way (PRoW), following established practice in Environmental Impact Assessment (EIA). It is not conventional for an Environmental Statement (ES) to have its own PRoW topic chapter. It is recognised that Sizewell C has a separate Amenity and Recreation chapter focusing on PRoWs, but it is noted that most other local EIA schemes in Suffolk (EA1, EA TWO, EA1 N and BTNO) also adopt the same approach as the Sea Link EIA. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a PRoW chapter it would risk double counting of effects already being reported somewhere else in the ES. It is our view that the structure of the ES as proposed allows for a full assessment of all potential impacts on PRoWs where there is the potential for significant environmental effects. Across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments the aspects mentioned by SCC will be covered. The concern that when considered individually, that an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, could be significant will be addressed within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects**, which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters. Importantly, it is not felt that a separate PRoW topic would result in any difference in the outcome of the assessment of overall impacts on PRoWs, and the required mitigation. An Outline Public Rights of Way Management Plan for Suffolk (see **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk**) has been prepared which provides details of PRoW closures and diversions. Continued liaison with SCC on this topic is ongoing.
Therefore, the County Council's position is that the impact on both the physical resource and the amenity value of the public rights of way and access network should be addressed as a separate theme within an Environmental Assessment. This should include the effect on the physical resource from temporary or permanent closures and diversions, and on the quality of user experience. Consideration should be given to the assessment methodology used for access and amenity in the Sizewell C Project which included the assessment of: - • Physical changes to resources (for example, changes to PRoW through diversions or creation of new road crossings) • Changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality or traffic movements • Changes to the experience people have when using recreational resources due to increases in the numbers of people using them	National Grid acknowledges the concern raised by SCC and has been in touch directly regarding this matter. It is proposed to continue to assess Public Rights of Way (PRoW), following established practice in Environmental Impact Assessment (EIA). It is not conventional for an Environmental Statement (ES) to have its own PRoW topic chapter. It is recognised that Sizewell C has a separate Amenity and Recreation chapter focusing on PRoWs, but it is noted that most other local EIA schemes in Suffolk (EA1, EA TWO, EA1 N and BTNO) also adopt the same approach as the Sea Link EIA. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a PRoW chapter it would risk double counting of effects already being reported somewhere else in the ES. It is our view that the structure of the ES as proposed allows for a full assessment of all potential impacts on PRoWs where there is the potential for significant environmental effects. Across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments the aspects mentioned by SCC will be covered. The concern that when considered individually, that an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, could be significant will be addressed within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects**, which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters.

Suffolk County Council Comment	National Grid's Response
	Importantly, it is not felt that a separate PRoW topic would result in any difference in the outcome of the assessment of overall impacts on PRoWs, and the required mitigation. An Outline Public Rights of Way Management Plan for Suffolk (see **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk**) has been prepared which provides details of PRoW closures and diversions. Continued liaison with SCC on this topic is ongoing.
For example, a possible permanent diversion of Sloe Lane public bridleway (E260/12A) within converter station site 1 may achieve the same number of metres of bridleway, but the quality of the experience for the users would be significantly changed (diminished) by the proximity to a construction site and a permanent urbanisation of a previously rural environment. How will this impact be assessed?	As part of the ongoing thematic meetings held since the statutory consultation, the assessment approach to Public Rights of Way (PRoWs) has been discussed and agreed with stakeholders. PRoW have been assessed following established practice in Environmental Impact Assessment (EIA). PRoWs are assessed across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments. Where combined impacts form the various assessments arise on a particular PRoW, the impacts are also considered collectively within the intra-project cumulative effects assessment, which considers the combined effects on PRoW and their users, that have been identified across the various topic chapters. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** has been developed in consultation with SCC and ESC. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. The proposed diversion routes are subject to agreement with SCC. The opportunities for recreation have been developed in collaboration with other key disciplines including traffic and transport and socio-economics. This has included a permanent PRoW diversion on the converter station site which has been designed to have a variety of experiences with some sections more open and others adjacent to woodland planting to aid screening of views towards the Suffolk Onshore Scheme. This has also included the provision of open access areas, as requested through stakeholder feedback.
The cumulative impact of this proposal with the other existing energy projects consented and proposed in this area is concerning. It is highly likely that there will be inter-project effects that will impact on the access network and its users. The lack of a single assessment approach for public rights of way, access and amenity could weaken the recognition of, and assessment of the cumulative effects, in particular the repeated closure or diversion of public rights of way, and the increased duration of these impacts as a result of the stream of NSIPs in a relatively small geographical area	The concern that when considered individually, that an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, could be significant will be addressed within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects**, which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters.
The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works. It will be unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects.	The proposed management and mitigation relating to Public Rights of Way (PRoW) is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** (Outline PRoWMP). The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** does not identify any significant impacts on PRoW in terms of diversions and closures, or in terms of non-motorised user amenity or fear & intimidation as a result of any interactions with construction traffic, with the proposed embedded mitigation and control and management measures in place. The temporary closures of PRoW have been considered within the landscape and visual impact assessment relating to visual amenity and landscape, with details to be referred to within **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment.** An assessment of impacts on PROW has been undertaken for the socio-economics assessment. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics,**

Suffolk County Council Comment	National Grid's Response
	Recreation and Tourism, Section 9: Assessment of Impacts and Likely Significant Effects and Application Document. An assessment of access to open space, leisure and play, and transport modes, access, connections and physical activity, is set out in the Assessment of Impacts and Likely Significant Effects section of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing.**
There will need to be mitigation, compensation, and management strategies to ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.	The proposed management and mitigation relating to Public Rights of Way (PRoW) is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** (Outline PRoWMP). The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** does not identify any significant impacts on PRoW in terms of diversions and closures, or in terms of non-motorised user amenity or fear & intimidation as a result of any interactions with construction traffic, with the proposed embedded mitigation and control and management measures in place.
These can typically include archaeological, ecological, site investigations and site clearance and in other NSIPS have not been included in the post commencement plans or within the DCO controls for temporary closures of PRoW. This raises concern as to the potential impact of these works on the access network specifically the level and control of traffic using PRoW for site access, and how PRoW will be managed during survey and site clearance works. It is suggested that the applicant consider a pre-construction management plan as was provided for EA1N and EA2.	In order for the elements of the Suffolk and Kent Onshore Schemes to be constructed, enabling works are required. These works include, the establishment of construction compounds, temporary bellmouths and access tracks and drainage works. The enabling works are consistent across all elements of the Onshore Schemes and have been described within the section on 'Terrestrial Enabling Works, Access, and Site Preparation' within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. These enabling works have been taken into account in the assessments of impacts on PRoW as reported within the ES and considered as part of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan - Kent.** Ecology surveys undertaken for the EIA have not resulted in any impacts or temporary closures of PRoW. An HRA was prepared for the ground investigation survey works, alongside an application for SSSI Assent, while a number of the monitoring boreholes required planning permission, meaning that they were subject to assessment by East Suffolk Council.
Discussions/decisions and agreements relating to public rights of way and open access land should be with the Highway Authority and Access Authority respectively, namely, Suffolk County Council.	Thematic meetings with the local planning authorities have taken place between the PEIR and ES stages of the DCO application process. The thematic meetings have primarily focused on discussing points raised by local planning authorities in the statutory consultation. The meetings have run by the technical disciplines and provided an opportunity to bring questions, concerns and local context to attention to help inform the ES. For example, in July 2024, a meeting was held with SCC and ESC to review the proposed design changes to the Suffolk Onshore Scheme as part of the targeted consultation period between 8 July and 11 August 2024, including potential implications to the traffic and transport assessment. The meeting was also used to cover the proposed scope of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** and the feedback previously received on PRoW as part of the statutory consultation. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** sets out measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project.
SCC as Local Highway Authority should be the discharging authority for any highway works.	Noted, no further response required.

21 Socioeconomics, Recreation & Tourism

Suffolk County Council Comment	National Grid's Response
The assessment refers to recreational routes and PRoW throughout and it is not clear what this includes. It should include PRoW, open access land, permissive access, promoted routes, cycle routes, and their users. This full range should be used in subsequent sources and impact tables for the various sites (2.11.3- 2.11.8).	**Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 4 - Approach and Methodology, presents the data sources used to gather the baseline data. These include SCC Definitive Map and Statement of public rights of way and Sustrans National Cycle Network route map. Recreational routes and PRoW which pass within the Suffolk Onshore Scheme Order Limits are identified in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism**, Section 7 - Baseline Conditions. Receptors comprise footpaths, bridleways, restricted byways and byways open to all traffic. A number of further PRoW and recreational routes have been located within 500 m of the Suffolk Onshore Scheme Boundary. This applies to routes used for both access and recreational purposes.
The baseline information should also include open access land and all nationally, regionally, and locally promoted routes such as the Sailors Path Walk and Suffolk Sandlings Cycle routes. Baseline data for PRoW must be obtained from the Definitive Map, the legal record of PRoW, held by SCC and available as digital files.	**Application Document 6.2.2.10 Part 2 Chapter 10 Socio-economics, Recreation, and Tourism,** Section 4 - Approach and Methodology, presents the data sources used to gather the baseline data. These include SCC Definitive Map and Statement of public rights of way and Sustrans National Cycle Network route map. Recreational routes and PRoW which pass within the Suffolk Onshore Scheme Order Limits are identified in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation, and Tourism,** Section 9 - Baseline Conditions. The study area for development land and open space is within, and up to 500m radius from the Kent Onshore Boundary. 500 m is considered the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits, based on the Design Manuel for Roads and Bridges (DMRB) LA 112 . Professional judgement has been used to consider receptors that lie outside of the study area but are of relevance to the assessment.
Suitable diversions where there could be temporary or permanent disruption to PRoW & recreational routes should be agreed with the Highway Authority in consultation with the LPA, and not the other way round.	Noted, this approach has been applied, and potential diversions have been subject to discussions at thematic meetings.
SCC welcomes the assessment taking account of the qualitative sensitivity of each receptor and hopes that this will ensure that the impact on the amenity value of the access network is adequately assessed in the ES.	This comment has been noted at ES.
22 Landscape & Visual	
The assessment refers to recreational routes and PRoW throughout and this should include PRoW, open access land, permissive access, promoted routes, cycle routes, and their users. This should include the England Coast Path National Trail which has been approved by the SoS for this area, the Suffolk Coast Path and Sandlings Walk.	The Landscape and Visual Impact Assessment assesses the effects of the Suffolk Onshore Scheme on visual receptors in the landscape and visual study area. This includes a range of routes, including the approved England Coast Path and various cycle routes, as discussed with stakeholders during landscape and visual thematic meetings. The representative viewpoints should be referred to at **Application Document 6.4.2.1.7 Representative Viewpoint Locations** and the assessment of effects on visual receptors at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.**
If a PRoW is proposed to be permanently diverted to accommodate a converter station, then this new route should be included in the representative viewpoint locations.	The effects arising from the Suffolk Onshore Scheme on visual receptors along permanently diverted PRoW are set out within **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment.**
Viewpoint 2 is not a representative viewpoint for the users of the PRoW network in Friston. It is suggested that there should be a viewpoint on the public footpath immediately to the west of the proposed extended National Grid substation, as this extension will bring the construction works and new build closer to this footpath (E-260/17/0) Viewpoint 9 – this is public bridleway and so the viewpoint should be from the perspective of both pedestrians, and someone seated on horseback.	The selection of representative viewpoints and the naming of routes throughout the study area have been discussed with stakeholders during landscape and visual thematic meetings as the design has progressed and are set out at **Application Document 6.4.2.1.7 Part 2 Suffolk Chapter 1 Representative Viewpoint Locations**. For Viewpoint 2, this viewpoint has been removed following the addition of more relevant viewpoints. A viewpoint has been added along E-260/17/0 to represent

Suffolk County Council Comment	National Grid's Response
Viewpoint 19 – suggest a viewpoint on adjacent footpaths to be more representative for users as FP22 (E-354/22/0) is a low use path compared to BR 2 (E-354/002/0) or FP5 (E-354/005/0). Viewpoint 3 – is on the west side of the town centre. There should be a viewpoint immediately east of Saxmundham on the B1119 at the start of the public footpath, FP23 (E-460/23/0) as this path will directly cross the proposed converter site 3. Viewpoint 5 – is the England Coast Path and Suffolk Coast Path, not the Sailors Path Viewpoint 7 – is the England Coast Path, Suffolk Coast Path, and the Sailors Path. Viewpoint 17 -is the England Coast Path, Suffolk Coast Path, and the Sailors Path	views of the proposed works at Friston. Viewpoint 9 comment: comment noted and those on horseback have been included in the assessment at **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**. Viewpoint 19 comment: comment noted, viewpoint moved to BR 5 as suggested. Viewpoint 3: Viewpoint added on FP23.
Visualisations – There should be visualisations of the proposed extension to the Friston substation as these works will result in that site being closer to the public footpath immediately to the west and northwest E-260/17/0. Further extensions for Eurolink and Nautilus will cumulatively not be minor.	Visualisations should be referred to within **Application Document 6.4.2.1.10 Part 2 Suffolk Chapter 1 Representative Viewpoint Visualisations** and include reference to Friston Scenario 1 and Friston Scenario 2 where appropriate to illustrate the potential changes under each scenario.
Impact Pathways with receptors are described as recreational routes and access land. See point 2.2.4.20; the baseline should make it clear what is included in this description.	The visual baseline is included within **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment.**
28 Traffic & Transport	
Suffolk County Council Green Access Strategy (Rights of Way Improvement Plan) should be included as relevant local planning guidance.	SCC's Supplementary Guidance Document on Public Rights of Way and Green Access has been considered as part of the management and mitigation proposed within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** (Outline PRoWMP).
The England Coast Path National Trail is within the study area. This part of the National Trail was approved by the Secretary of State on the 29th January 2020 and is currently awaiting implementation works which would bring the legal rights into effect. SCC anticipates that these works will take place in 2023-24 and hence should be scoped into this application.	Noted, the National Trail, now named King Charles III England Coastal Path has been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
It is stated that AECOM WebGIS has been used as the source for defining and labelling the routes of public right of way. However, the legal record for PRoW, the Definitive Map & Statement is held by Suffolk County Council and so the applicant is advised to acquire the digital data directly from the county council. Labelling on maps and in the document should follow the normal SCC convention of Area – Parish number/path number, i.e., E-260/007, and not the PROW ID code as that is meaningless to the public and not used by SCC	The definitive Public Right of Way map has been applied to the assessment set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, with management and mitigation set our within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.**
The active travel network lists 'bridleways and shared walking and cycling routes'. This should also include public footpaths. Same comment for all sites (2.8.4.20, 2.8.4.30, 2.8.4.40, 2.8.4.50)	Noted, public footpaths are included as part of the review and assessment of PRoW as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, with management and mitigation set our within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.**
Should also include the England Coast Path National Trail. Same comment for all sites (2.8.4.11, 2.8.4.21, 2.8.4.31,2.8.4.41 and 2.8.4.51)	Noted, as per comment above the National Trail, now named King Charles III England Coastal Path has been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**.
Control & Management measures should consider the production of a pre-construction management plan to capture activities that could impact prior to commencement	Noted, **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** identifies measures to minimise disruption during the construction phase of the Proposed Project.

Suffolk County Council Comment	National Grid's Response
TT03 SCC seeks a firm commitment to minimising disruption to the access network and its users. Please refer to Appendix 1 for the County Council guidance.	Noted, **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk** identifies measures to minimise disruption during the construction phase of the Proposed Project.
The impact pathway that recognises decline in pedestrian and cyclist amenity must also include horse riders as users of the road network and the public bridleways within the converter station and landfall sites and cable corridors. Construction & decommissioning – Results in PRoW diversions and/or closures National/regional walking and cycling routes should be scoped in, many of these routes are using the PRoW.	Noted, the use of the road network and bridleways by horse riders are included as part of the review and assessment of PRoW as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, with management and mitigation set our within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.**
As explained in the summary, it is SCC's view that the impacts on the access network should be considered as a topic in its own right in order to reflect the true impact on the physical network and most crucially on the users (receptors) of that network.	National Grid acknowledges the concern raised by SCC and has been in touch directly regarding this matter. It is proposed to continue to assess Public Rights of Way (PRoW), following established practice in Environmental Impact Assessment (EIA). It is not conventional for an Environmental Statement (ES) to have its own PRoW topic chapter. It is recognised that Sizewell C has a separate Amenity and Recreation chapter focusing on PRoWs, but it is noted that most other local EIA schemes in Suffolk (EA1, EA TWO, EA1 N and BTNO) also adopt the same approach as the Sea Link EIA. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a PRoW chapter it would risk double counting of effects already being reported somewhere else in the ES. It is our view that the structure of the ES as proposed allows for a full assessment of all potential impacts on PRoWs where there is the potential for significant environmental effects. Across the Landscape and Visual, Traffic and Transport, Socio-Economics, Recreation and Tourism and Health and Wellbeing topic assessments the aspects mentioned by SCC will be covered. The concern that when considered individually, that an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, could be significant will be addressed within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects**, which will consider the combined effects on PRoW and their users, that have been identified across the various topic chapters. Importantly, it is not felt that a separate PRoW topic would result in any difference in the outcome of the assessment of overall impacts on PRoWs, and the required mitigation. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk** has been prepared which provides details of PRoW closures and diversions. The proposed management and mitigation relating to Public Rights of Way (PRoW) is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk** (Outline PRoWMP). The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** 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. Continued liaison with SCC on this topic is ongoing.
Includes PRoW diversions and/or closures as a criteria to be considered in the assessment. It is not clear if this solely refers to the impact of traffic on PRoW, or to the fact that PRoW are public highways in their own right, and in which case, the assessment should be considering the impact on all the nonmotorised users, walkers, cyclists, and horse riders.	Noted, the assessment of PRoW Diversions and Closures in relation to the Proposed Project has been based on the PRoW receptors identified in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport.** This chapter includes an assessment of Severance, Pedestrian Delay, Non-motorised user amenity and Fear and Intimidation which has been based on PRoW receptors as well as road links and junctions.

Suffolk County Council Comment	National Grid's Response
The description of the existing baseline for PRoW should start with the depiction and labelling of PRoW as shown on the Definitive Map -see 2.8.4.1 The requirement to carry out surveys should be agreed with the relevant highway authority, rather than the local planning authority	Noted, the PRoW labelling has been updated based on the Definitive Map and the existing baseline of these PRoW is reported within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Outline PRoWMP)** and **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** The proposed management and mitigation relating to Public Rights of Way (PRoW) as set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Outline PRoWMP)** will be put in place irrespective of existing usage levels, to retain safe PRoW access for all users. The requirement for any PRoW surveys can be reviewed during Examination if necessary, although this is not expected to affect the management/ mitigation proposed given that this will be in place for all PRoW within the Order Limits.
This should also include horse riders as both users of the road network and public bridleways of which there are several within the sites and preference areas.	Noted, bridleways are included as part of the review and assessment of PRoW as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
It is not clear how the assessment will define the sensitivity of users of the PRoW network. The receptor examples appear to relate PRoW to highway links and junctions, or as' walk/cycle links; lightly to heavily trafficked highways.' How will the assessment approach assessing a popular local walking route on a PRoW across open countryside? Will each PRoW be assessed individually and as part of the connected network?	The receptor sensitivity levels attributed to PRoW are within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and have been informed by a high-level desktop review of route quality and potential usage levels with consideration to surfacing, signage, available width, potential obstructions etc., as well as the availability of alternative routes which could be used, to consider PRoW as a connected network.
The states thresholds are a useful starting point but should be based on evidence and data, as well as the use of professional judgement. For example, the temporary closure of a single PRoW with a longer diversion is categorised as a small magnitude, but in reality, if this is the only PRoW that serves the community, or is the only bridleway allowing horse riding, then the magnitude of that impact, and the sensitivity of the receptor would not be small.	As above, the receptor sensitivity levels attributed to PRoW within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** consider the availability of alternative routes which could be used, to consider PRoW as a connected network. Measures to manage PRoW users during the construction phase are identified within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
The methodology also needs to consider permanent diversions of PRoW. Both converter sites 1 and 3 are crossed by public rights of way which may need to be permanently diverted.	Noted, an assessment of PRoW diversions and closures for all non-motorised users is set out within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**, Section 8.9. Measures to manage PRoW users during the construction phase are identified within Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk. An Outline PRoW Management Plan has also been provided, found in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.**
Table 2.8.11 – 2.8.15 PRoW diversions and /or closures, and National/regional walking & cycle routes should be scoped in for the operation and maintenance phases if a permanent diversion has taken place, such as at a converter site; the quality of the user experience will have been irrevocably changed by the presence of the converter station and that should be captured in the assessment.	The additional mitigation required for any permanent PRoW diversions will be applicable to all phases and the likely impact is considered to remain the same as the findings for the construction and decommissioning phase as presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.** It should also be noted that PINS has agreed to scope out transport-related impacts during the operation and maintenance phase and as such, no assessment has been carried out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
SCC expects the following principles to be adhered to for this development at all sites; landfall, converter sites, extension to the National Grid substation and the terrestrial corridor: - • Early engagement with SCC PRoW & Access Team to discuss the impact on and management of the PRoW & access network. SCC is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail. • The Applicant must obtain the Definitive Map and Statement from the PRoW & Access Team at SCC. This is the only source of the up-to-date record of the PRoW (supplied digitally). • Public rights of way should be marked on plans using the SCC digital data	An assessment of PRoW and national/regional walking and cycling routes with respect to severance, pedestrian delay, non-motorised user amenity and fear & intimidation, as well as PRoW diversions and closures is set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic & Transport.** Measures to manage PRoW users during the construction phase are identified within **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk**. An Outline PRoW Management Plan has also been provided, found in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk.**

Suffolk County Council Comment	National Grid's Response
and labelled as per the Definitive Map and SCC convention (Area -parish number - path number) • Where PRoW are directly impacted, a pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with SCC as Highway Authority. This should include pre-construction work where PRoW might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles. • Where impacted by the works, any PROW will be restored to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with SCC. • Where PRoW cross the cable corridor, haul road, access tracks and other sites, the surface must be always kept in a safe and fit condition for all users to the satisfaction of SCC. • Pre-construction works must not obstruct or disturb any public rights of way (e.g., newt fencing, archaeology surveys etc) unless otherwise agreed with the County Council. Management measures or temporary closures not covered in the DCO must be by application to SCC. • Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to always use with management measures put in place with the agreement of SCC. • Any temporary closure of a PRoW must be agreed with SCC and the duration kept to the minimum necessary • An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure to a standard agreed with the SCC. • The location of alternative routes to be agreed with SCC. • Any alternative route must be safe and fit for the public to always use – suitable surface, gradient and distance with no additional road walking between the natural destination points. • Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route – process and cost to be agreed between applicant and SCC. • There will be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.	
Other Potential Impacts	
It is acknowledged that this scheme could potentially cause impacts for the emergency services with reference to potential highways diversions, AIL movements and related traffic delays.	Noted, assessment of likely increases in traffic during construction of Sea Link (including with respect to driver delay) is provided in **Application Document Part 2 Suffolk Chapter 7 Traffic and Transport**. Details relating to any temporary traffic management, highway improvements and AILs (including management) are set out within Volume 7 Other Documents, **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk.**
SCC requests that the applicant considers the cumulative impacts of construction activities on local communities of a number of projects potentially occurring with overlapping timescales in the area of the Sea Link proposals.	Noted, a full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The full assessment is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
These cumulative impacts would include noise, traffic delays caused by diversions or an increase of HGV movements and related issues for pedestrians crossing roads, and an increase in the demand of rental accommodation.	Noted, a full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in

Suffolk County Council Comment	National Grid's Response
	significant cumulative effects. The full assessment is available within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

1.31 Surrey County Council

Table 1.30 Surrey County Council

Surry County Council Comment	National Grid's Response
Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority on the application for an order granting Development Consent for the Sea Link (Ref: EN020026-000024-221025). The Minerals and Waste Planning Authority have no comments to make.	Noted, no further response required.

1.32 Thanet District Council

Table 1.31 Thanet District Council

Thanet District Council Comment	National Grid's Response
Thank you for the consultation and notification of the Applicant's request to the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the proposed development.	Noted, no further response required.
Our response will focus on the Kent Onshore Scheme and specifically the Landscape and Visual Impacts, Agriculture and Soils, Air Quality, Noise and Vibration and Socio-economics, Recreation & Tourism Sections. We will defer to Kent County Council, Natural England and the Environment Agency for matters relating to Ecology and Biodiversity, Cultural Heritage, Water Environment, Geology and Hydrogeology, Traffic and Transport, Health and Wellbeing.	Noted, no further response required.
Landscape and Visual Impacts Assessment	
The Landscape Character Assessment SPD has been referred to, it has full weight of Planning Policy and must form part of the assessment of Landscape and Visual Impact Assessment and Scope of the EIA.	No further comment required.
In terms of the representative viewpoint locations identified for inclusion in the Landscape and Visual Impact Assessment, we consider the locations identified to be appropriate and we request inclusion of the following additional viewpoint locations:	No further comment required.
Junction of Ebbsfleet Lane North/Grinsell Hill Part of the Viking Coastal route, sensitivity for residential, pedestrian and vehicle receptors	The Applicant has sought to agree viewpoints with Thanet District Council at a Thematic landscape meeting on the 10 May 2023. Suggested viewpoints from Thanet District Council have all been incorporated into the revised representative viewpoint schedule (viewpoints 4 and 5, see **Application Document 6.4.3.1.6 Representative Viewpoint Locations**) other than viewpoints at the junction of Canterbury Road West and the A299 and the Lord of the Manor Roundabout. As it was not possible to gain safe pedestrian access to them, viewpoints 11 and 13 respectively were agreed as alternatives (see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**).
Junction of Canterbury Road West and A299 (western extent of northern part of Cliffsend) Residential and vehicle receptors, features of Landscape Character Area (views of Sandwich and Pegwell Bay)	The Applicant has sought to agree viewpoints with Thanet District Council at a Thematic landscape meeting on the 10 May 2023. Suggested viewpoints from Thanet District Council have all been incorporated into the revised representative viewpoint schedule (viewpoints 4 and 5, see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**) other than viewpoints at the junction of Canterbury Road West and the A299 and the Lord of the Manor Roundabout. As it was not possible to gain safe pedestrian access to them, viewpoints 11 and 13 respectively were agreed as alternatives (see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**).
Lord of the Manor Roundabout (Sandwich Road junction) Pedestrian and vehicle receptors, large number of movements with long distance view towards the site, close proximity to Public Rights of Way Network.	The Applicant has sought to agree viewpoints with Thanet District Council at a Thematic landscape meeting on the 10 May 2023. Suggested viewpoints from Thanet District Council have all been incorporated into the revised representative viewpoint schedule (viewpoints 4 and 5, see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**) other than viewpoints at the junction of Canterbury Road West and the A299 and the Lord of the Manor Roundabout. As it was not possible to gain safe pedestrian access to them, viewpoints 11 and 13 respectively were agreed as alternatives (see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**).

Thanet District Council Comment	National Grid's Response
Intersection of Te40 and Te37 Pedestrian route on public network, features of Landscape Character Area(views of Sandwich and Pegwell Bay)	The Applicant has sought to agree viewpoints with Thanet District Council at a Thematic landscape meeting on the 10 May 2023. Suggested viewpoints from Thanet District Council have all been incorporated into the revised representative viewpoint schedule (viewpoints 4 and 5, see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**) other than viewpoints at the junction of Canterbury Road West and the A299 and the Lord of the Manor Roundabout. As it was not possible to gain safe pedestrian access to them, viewpoints 11 and 13 respectively were agreed as alternatives (see **Application Document 6.4.3.1.6 Chapter 1 Representative Viewpoint Locations**).
Given that the parameters will be broad in terms of scale, with no detail submitted in this respect up front of the Development Consent Order (DCO) it is considered that specific material and colour details should be provided alongside wireframe visual representation at each viewpoint, as a minimum, presenting the worst case scenario in terms of the scale and extent of development within those viewpoint locations identified.	The design of the converter station and substation, in terms of the building form and the cladding materials, has been developed alongside consultation and stakeholder feedback and design principles have been provided with the application for development consent detailing the design intent and design principles that will be adopted and embedded into the design of these structures, see **Application Document 7.12.2 Design Principles – Kent**. Photomontages are presented in **Application Document 6.4.3.1.8 Chapter 1 Representative Viewpoint Visualisations** and show the worst-case, maximum parameters of the Minster Converter Station and Minster Substation.
Agriculture and Soils	
The Council considers that the approach towards assessment of soil characteristics and Agricultural Land Classification surveys; and the subsequent methodology for scoping in/out this aspect within the ES to be acceptable.	Noted, no further response required.
Air Quality	
The Council's Senior Environmental Health Officer has reviewed the Air Quality Section of the document and considers that appropriate screening methodologies and baseline information has been used to scope out operational sources, maintenance and construction NNRM plant but scoped in for some construction impacts identified on Page 214. The screening assessment has been done using relevant guidance, that is; IAQM for construction impact, IAQM for AQ & Planning and TG16 LAQM taking into account embedded CEMP mitigation is set out in 1.4 A3. Scoping conclusions are accepted for human health receptors. Natural England will comment for environmentally sensitive receptors.	Noted, no further response required.
Noise and Vibration	
The Council's Senior Environmental Health Officer has reviewed the Noise and Vibration Section of the document and considers that very few impacts have been scoped out and those that have are based on appropriate assessment methodologies distances. No further comments other than as above, Natural England will respond in relation to environmentally sensitive receptors.	Noted, no further response required.
Socio-economics, Recreation & Tourism	
The Council has no particular comments in relation to this area of assessment other than to say it is considered that the impacts that have been scoped in are appropriate. Kent County Council will respond in relation to any impacts on Public Rights of Way.	Noted, no further response required.

Thanet District Council Comment	National Grid's Response
Cumulative Effects	
The list of projects proposed to be taken forward to Stage 2 in table 3.13.3 is considered acceptable at this point. We would welcome further engagement with the applicant prior to finalising the assessment in this section of the EIA to ensure that any relevant projects generated in the next 6 months are included where appropriate.	Noted, a full inter-project cumulative effects assessment has been carried out for the Proposed Project and includes consideration of all other proposed developments which could result in significant cumulative effects. The full assessment is available within **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.** The long list and short list was shared with TDC on 16/10/2024. In addition, meetings were held with Kent LPAs (Thanet District Council, Kent County Council and Dover District Council) on the 12 November 2024 and Suffolk LPAs (Suffolk County Council and East Suffolk Council) on 20 November 2024 to discuss and, where possible, agree the short list. Ten additional development/applications were raised for review and resulted in an additional three developments being added to the short list, presented in **Application Document 6.3.1.5.C Appendix 1.5.C Inter-Project Cumulative Effects Short List.**

1.33 Theberton and Eastbridge Parish Council

Table 1.32 Theberton and Eastbridge Parish Council

Theberton and Eastbridge Parish Council Comment	National Grid's Response
Theberton	
Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) large twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village entrance sign. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community and surrounding areas.	Noted, no further response required.
Eastbridge	
Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders the Minsmere River which cuts through an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is also the location of RSPB Minsmere Reserve. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via National Trust's Dunwich Coastguards Cottages.	Noted, no further response required.
Both villages are chiefly agricultural, and people live there historically or by choice for the tranquillity, dark skies, and the proximity to the Suffolk Heritage Coast. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.	Noted, no further response required.
Our major concern is that all the National Strategic Infrastructure energy projects should collectively minimize their onshore impacts on both the Area of Outstanding Natural Beauty, Heritage Coast and the National and International designated sites that overlap along the coastal strip and the inland rural/agricultural land to the west of the AONB and around Leiston, Saxmundham, Aldeburgh and the various outlying villages such as Theberton and Eastbridge.	The effects of the Proposed Project on National Landscapes (AONB's) and Heritage Coast is included at **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual.** The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

Theberton and Eastbridge Parish Council Comment	National Grid's Response
We are also concerned that some of the optioneering in Suffolk for the landfall and converter stations is fanciful and would appear only to be there to justify the eventual preference.	A robust alternatives assessment has been undertaken for the Proposed Project. Further information is contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered, including potential landfall and converter station locations, are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
We also note that proposals being discussed by Sea Link, Eurolink and Nautilus about having a common landfall in Suffolk as well as a potential single converter station site are not referenced in the overview section of the Scoping Report.	Since submission of the EIA Scoping Report the design of the Proposed Project has been developed and refined. For the latest details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** .
Siting and Cable Routes	
Should Scottish Power's (SPR) EA1N and EA2 and the associated NGS not be approved, then T&EPC would have to withdraw these comments and reconsider any amended proposals in the light of such a decision.	Noted, no further response required.
On the assumption that EA1N, EA2 windfarm and National Grid substation (NGS) north of Friston are approved and constructed, we feel that any Sea Link converter station and links from the shore and to the National Grid substation from the converter station should minimize the spread of infrastructure and length of cable routes as far as possible.	Noted, as mentioned above, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
On the basis that EA1N/EA2 and the NGS are approved, whilst only one of the converter substation sites, option C, lies within the T&E Parish boundary, option A (very close to T&E Parish boundary) is now impractical considering this is on land destined to be part of the construction site for Sizewell C, having now had approval by the Secretary of State (subject to challenge and financial agreements). Option B is within the AONB and is in contravention of National Grid's Horlock rules for substation siting, although both Greater Gabbard and Galloper wind farms already have substations in this area.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various Converter Station Site Option Areas are contained in **Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and**

Theberton and Eastbridge Parish Council Comment	National Grid's Response
	Substation Siting Study (October 2022), **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Options G, H and I require unnecessarily long cable corridors as both pass the westward extent of the Friston substation site, are also west of the East Suffolk train line and, in the case of G, west of the A12 which would add complications to any cable trench development.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various Converter Station Site Option Areas are contained in **Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Our concern with many of these potential sites is the industrialization of the countryside around Leiston, Friston, Knodishall, Theberton and Saxmundham alongside the knowledge that there are two further landfall and converter substation proposals yet to be subject to scoping opinion requests and we have no guarantees that these projects will be progressed in a way that will be minimally damaging during development and with as sympathetic as possible impact on the landscape and local amenity once complete and operational.	The indicative landscape strategy for the Sea Link only option (**Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation**) has been developed in collaboration with various disciplines to maximise opportunities to minimise effects arising from the Proposed Project and has also been developed in parallel to the co-location masterplan (Appendix A of **Application Document 7.10 Coordination Document**). The indicative landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**) including screening in the form of proposed woodland, hedgerow and hedgerow tree planting, as well as responding to the local context in terms of the design of the landform. The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Landfall S5 is simply unacceptable as it crosses into the Minsmere and Walberswick Coast and Heaths SSSI and potentially the Minsmere Ramsar designation. There are also potential conflicts with the Sizewell C development.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. Landfall S5 has not been taken forward. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various landfall areas of search, including the reasons for not selecting S5 are contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report.**

Theberton and Eastbridge Parish Council Comment	National Grid's Response
	Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Landfall S4 seems to go directly through the Sizewell A site, which seems fanciful unless it could also enable a converter station on site and Grid connection at Sizewell B/C substations but, given the existing land constraints at the Sizewell A/B/C site, such an aspiration seems to be completely fanciful. However, use of converter site B would potentially work, were it not within the AONB and thus contrary to the Horlock rules.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. Landfall S4 has not been taken forward. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various landfall areas of search, including the reasons for not selecting S4 are contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Landfall S1 at Aldeburgh Marshes through a coastal frontage just south of Aldeburgh, that is under considerable stress from erosion, and so close to Aldeburgh itself, was always going to be inappropriate, even before you consider the cable route to any converter station crossing the Alde twice and going through a number of designated landscapes including both SSSI and Ramsar sites.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. Landfall S1 has not been taken forward. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various landfall areas of search, including the reasons for not selecting S1 are contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
If the site for the Sea Link Interconnector converter station is settled before the other two projects come forward, it should have sufficient potential capacity to accommodate both the Nautilus and Eurolink converter stations also	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document .** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with the LionLink (formerly Eurolink) and Nautilus projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed

Theberton and Eastbridge Parish Council Comment	National Grid's Response
	developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Cable routes for these three projects should be developed simultaneously to avoid multiple disruptions through sequential cable corridor excavation and construction.	Noted, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Table 2.1.1 states that potential converter station sites would connect at Sizewell. Ignoring the fact that A is SZC construction site and B is in the AONB and, thus breaching the Horlock rules, site D is much closer to Friston substation than Sizewell and would have significant issues negotiating SZC developments such as the green rail route into the construction site. Site C is roughly equidistant from Sizewell and Friston but once again conflicts with any SZC development are likely to make this siting and return connection to Sizewell problematic.	Since submission of the EIA Scoping Report the design of the Proposed Project has evolved, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** for the Proposed Project design that has been assessed within the EIA and reported on within the ES. A robust alternatives assessment has been undertaken for the Proposed Project. Further information on the various Converter Station Site Option Areas considered and the selected option are contained in **Application Document 6.2.1.3 Part 1 Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report**. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
It is good to see a significant consideration of the landfall, cable routes and converter station option at 2.1.8.16 through 2.1.8.23 which also revealed an additional potential converter station outside Saxmundham at site 3 (Figure 2.1.3).	Noted, no further response required.
Whilst many of the converter station sites have some level of existing natural screening, most are in relatively flat countryside with little hope of developing screening in a reasonable timeframe given the 24-30m high converter buildings.	Noted, no further response required.
Traffic and Transport	
The discussion of site 3 at 2.1.8.9 and the possibility of a temporary connection to the B1121 across the Fromus, reignites a discussion once again of the missed opportunity of a SZC Route D2 relief road, originally proposed during the Sizewell B construction and raised during the Sizewell C consultations and Development Consent Order consideration by the Planning Inspectorate. This would have connected to the B1122 at the proposed SZC site entrance, between Leiston and Theberton, from the A12, slightly north of the B1121 junction to Saxmundham.	The comment regarding the Sizewell B and C applications is noted. Site 3 (shown on Figure 2.1.3 in the EIA Scoping Report Volume 3 Figures) has been selected following further review of the design since the submission of the EIA Scoping Report. All required accesses are included within the Order Limits. It is proposed to access the Saxmundham Converter Station site from the B1121 (via proposed bellmouth S-BM09) both during construction and operation as shown in **Application Document 2.7.1 Access, Rights of Way and Public Rights of Navigation Plans - Suffolk**. For further details please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

Theberton and Eastbridge Parish Council Comment	National Grid's Response
	Alternative options for accessing the Saxmundham Converter Station site (in the location of Site 3) have been considered as reported in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered.
It is unfortunate that more significant coordination between Scottish Power, and the three National Grid projects and the Sizewell C project were not properly entertained at an earlier date. The lack of forward planning for all this land-based infrastructure and power generation will result in unnecessary disturbance for the local population, damage to the tourist economy, the countryside and general amenity of this area over many years as a result.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Had D2 been properly assessed by considering all of these projects collectively, a Sizewell Link Road (SLR) that sends all HGV and AIL along the direct D2 route rather than around two sides of a 5–6-mile sided triangle halving the resultant carbon emissions.	HGV routing has been agreed with SCC Highways at thematic meetings. The D2 route was not considered as part of the access proposals for Saxmundham Converter Station as this was not a likely foreseeable proposal at the stage of routeing and siting. An access to Saxmundham Converter Station from the B1121 to the north of Saxmundham was considered but for the reasons set out in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** this option was taken forward.
The D2 route would also have significantly improved access to the two wind farm substation sites and these three National Grid interconnector sites rather than being significantly constrained by the inadequacies of the A1094, B1121 and B1119. All of these issues were raised at both the Scottish Power and Sizewell Development Consent Order applications, but once again the folly of this piece-meal approach shows its shortsightedness.	HGV routing has been agreed with SCC Highways at thematic meetings. The D2 route was not considered as part of the access proposals for Saxmundham Converter Station as this was not a likely foreseeable proposal at the stage of routeing and siting. An access to Saxmundham Converter Station from the B1121 to the north of Saxmundham was considered but for the reasons set out in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** this option was taken forward.
Whilst the Site 4 (C) converter station site may benefit from the proposed SLR, assuming the construction is completed in time, even that will be constrained by the B1122 and country lanes should the SLR not be ready in time. If the SLR is ready in time only one crossing roads in the Theberton area will be available for access at Pretty Road as Moat Road access from the B1122 will be closed	Converter Site 4 was not selected as the preferred site for the Proposed Project for the reasons set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**.
It has been accepted into the SLR plan that a bridge across the SLR will be constructed on Pretty Road. However, it is not clear if this bridge will be of sufficient standard to accommodate large AILs and with no right turn off the SLR on to Moat Road access to Site 4 may not be possible	This is not relevant for the Proposed Project, as construction vehicles associated with the Proposed Project will not utilise the Sizewell Link Road or the proposed bridge on Pretty Road.
Access to Pretty Road and the bridge will have to be by exiting the SLR at the B1125 junction, turning right on to the B1122 and then right again into Pretty Road at a challenging blind bend on the B1122	A CTMTP has been prepared and is provided in **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan - Suffolk,** which includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase.
Section 2.8 Traffic and Transport (2.8.1.4) refers to Figure 2.8.1 Proposed Study Area in Suffolk (Traffic & Transport). The boundary to the north near Theberton stops at the crossroads on the B1122 junction with Moat Road and Onners Lane. Restricting the boundary to this point is not appropriate as Moat Road will be closed due to the construction of the SLR and the only access to the SLR at Moat Road will be from the west, close to the junction with George Road, that goes south past Theberton Grange. This will be one way to Yoxford only.	The study area was subsequently agreed with SCC Highways at thematic meetings as part of establishing the extent of the road network subject to potential effects.

Theberton and Eastbridge Parish Council Comment	National Grid's Response
As previously stated in 3.5, access to site 4 would only be possible via Pretty Road and across a new bridge, which almost certainly will not be robust enough for any large transformer transports required during the build or during operational maintenance.	This is not relevant for the Proposed Project, as construction vehicles associated with the Proposed Project will not utilise the Sizewell Link Road or the proposed bridge on Pretty Road.
The study area boundary and key local junctions list (2.8.3.5) needs to be extended north to include the proposed junction of the B1125 with the proposed SLR, B1125 junction with the B1122 (both before and after the SLR is operational) and ensure that the SLR impacts are fully understood for both the construction period and operational period.	The B1125 will not experience any construction traffic as a result of the Proposed Project and this has therefore been excluded from the study area.
Whilst converter station site 4 seems unlikely to become a preferred or alternative site for the project, the impact of the SLR needs to be fully appreciated both during construction and once operational.	Site 4 has not been taken forward. For further details of the design of the Proposed Project assessed within the EIA, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** In regard the Sizewell Link Road (SLR), it is noted in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** that the SLR and its associated junctions is likely to have been implemented during construction of the Proposed Project. Any construction traffic associated with Sizewell C has been assessed as part of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects**. In terms of operation, the highway improvements brought about by the SLR would increase the capacity of the highway network to accommodate construction traffic associated with the Proposed Project. Nonetheless, for the purposes of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshre Scheme Inter-Project Cumulative Effects** it has been assumed that none of these improvements would be in place for robustness and to represent a worst-case assessment.
Paragraphs 2.8.3.1 and 2.8.3.4 describe Leiston as a village! This is disappointing as Leiston has a Town Council and a population of around 4,600 which is still expanding as new housing estates are completed and should not be considered as a village anywhere in this Scoping Report. Such inappropriate descriptions will tend to lessen the perceived impact of any construction or operational impacts on Leiston.	Noted, references to Leiston have been updated accordingly within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
It is surprising that the whole of the B1122 between Leiston and Yoxford as well as the SLR proposals are not being included in the boundary as the B1122 is the only approved HGV route for AILs in the area. This was recognised by the recent Scottish Power wind farm and Sizewell C proposals. In the case of the Scottish Power wind farm, it was also recognised that the A1094 is unsuitable for AIL deliveries because of the rail bridge just east of the junction with the A12. For this reason, the boundary should be extended to the full length of the A1094 and its junction with the A12.	The study area has been expanded and includes the whole of the B1122 from Leiston to Yoxford as identified and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
Similarly, the western extent of the boundary doesn't include the junction of B1122 and B1119 in the centre of Saxmundham, which may be critical for Site 3 access should no temporary access be developed across the Fromus south of Saxmundham. This traffic light-controlled junction is significantly constrained and there is also a bridge across the Fromus on the B1119 close to the church which should be assessed.	The study area has been expanded and includes the junction of the B1122 and B1119 in Saxmundham as identified and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport.**
Paragraph 2.8.7.19 should include a reference to the SZC development of the SLR and potential Sea Link impacts during its construction, as well as the impacts of an SLR once complete and operational both on the Sea Link project construction/development and its operation.	Noted, the inter-project cumulative effects are assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** The assessment in this chapter assesses the combined impact of other proposed developments within the cumulative study alongside the impacts associated with the Proposed Project and determine the significance of effect and whether any additional mitigation is required.
Air Quality, Cumulative Impacts and Biodiversity	

Theberton and Eastbridge Parish Council Comment	National Grid's Response
Given the above comments regarding the Traffic and Transport section boundaries and the comments above, it is surprising that the Air Quality only refers to Figure 1.1.2 Suffolk Onshore Scheme Scoping Boundary as this only covers the areas for the landfall, cable swathes and converter station sites. Air quality impacts should be assessed for the entire Transport and Traffic boundaries once finalized and given the A12 is the only major access route to this area of East Suffolk should probably have some level of assessment for traffic coming from both the North, to the Yoxford junction with the B1122, and from the South, to the junction with the A1094.	Assessment of the likely impacts is detailed in Section 8.9, and summarised in **Application Document 6.3.2.7.G Appendix 2.7.G Preliminary Highway Impact Assessment.**
Cumulative impacts with the three approved projects (two Scottish Power wind farms and Sizewell C) as well as potential cumulative impacts with Eurolink and Nautilus also need to be included in both the Traffic and Transport and Air Quality sections.	Traffic and Transport and Air Quality have undertaken their assessments on the Cumulative Impacts for all these projects within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
It is pleasing, and appropriate, to see a commitment to 10% Biodiversity Net Gain (BNG) (2.3.2.6) regardless of the provisions in the Environment Act 2021 and the expected legislation for mandatory 10% BNG in 2023 and for the project being supportive of the DEFRA Biodiversity 2020 strategy (2.3.2.9)	Noted, no further response required.
Birds section (2.3.2.26) is missing a reference to Stone Curlew that nests within Minsmere Reserve	Noted, no further response required.
Conclusion	
This response, to the Scoping Report request for the Sea Link Interconnector, has identified that the Scoping Report does not properly identify the full scope of potential impacts, as a result of inappropriate restriction of some assessment boundaries and by incomplete appreciation of the extent and cumulative impacts of the two Scottish Power wind farm projects and the Sizewell C project.	Noted, the inter-project cumulative effects are now fully assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects.** The assessment in this chapter assesses the combined impact of other proposed developments within the cumulative study alongside the impacts associated with the Proposed Project and determine the significance of effect and whether any additional mitigation is required.
Whilst there are welcome words about cooperative development for the three interconnector projects, cumulative impact statements and assessment boundaries are inconsistent and often too restrictive which will result in an incomplete appreciation of the cumulative and development organisational impacts of the three, already approved, National Strategic Infrastructure projects.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document** . The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**
Whilst we understand the National need for expanding both offshore wind and improving the interconnectedness both within the UK and between the UK and neighbouring countries across the North Sea, such developments need to be undertaken in a sympathetic and coordinated manner, especially when their timeframes are so closely defined, and all three projects are within the overarching responsibility of National Grid.	Noted, the Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document**. The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

Theberton and Eastbridge Parish Council Comment	National Grid's Response
If this is not addressed adequately by National Grid during the development of the Sea Link assessment plan and similarly by the associated Eurolink and Nautilus assessment plans, the result will be significant repeated disruption and damage to the coastal environment of East Suffolk along with the coastal hinterland, which is host to significant designated sites, AONB and Heritage Coast and is unacceptable.	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with tother projects in Suffolk where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

1.34 UK Health Security Agency

Table 1.33 UK Health Security Agency

UK Health Security Agency Comment	National Grid's Response
Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID. The response is impartial and independent.	Noted, no further response required.
The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.	Noted, please refer to **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** for the full assessment.
Having considered the submitted scoping report we wish to make the following specific comments and recommendations:	Noted, comments are addressed below.
Environmental Public Health	
We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.	The response has been noted. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the NPS and relevant guidance and standards, including IEMA and HUDU.
In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental Statement1 . This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.	The response has been noted. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** considers the NPS and relevant guidance and standards, including IEMA and HUDU and the content within the Public Health England advice document.
Recommendation	
Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to nonthreshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.	A complete assessment of health and wellbeing effects has been undertaken. This is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. It is concluded that there are no anticipated significant effects on health and wellbeing arising from changes to air quality as a result of the Proposed Project.

UK Health Security Agency Comment	National Grid's Response
Human Health and Wellbeing - OHID	
This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are: Access Traffic and Transport Socioeconomic Land Use	The Assessment of Impacts and Likely Significant Effects is set out in both Application Document 6.2.2.11 ES Part 2, Chapter 11: Health and Wellbeing and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**, considering: Access to healthcare services and other social infrastructure; Access to open space, leisure and play; Air quality; Noise and vibration; Transport modes, access, connections and physical activity; Employment and income; and Social cohesion and community identity. It is concluded that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project.
Having considered the submitted scoping report OHID wish to make the following specific comments and recommendations:	No response required
Methodology - Determination of significant effects	
It is noted that the Health and Wellbeing Chapters for the Suffolk and Kent on shore reports are drafted with reference to the London HUDU assessment approach and as such no assessment of significance is provided for human health.	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.** The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
This approach does not conform to the requirements of the EIA Regulations and as such an assessment of significance will be required to form part of the Environmental Statement. This is consistent with recent PINS approach to this issue within the SoS Scoping opinion for the National Highways M60/M62/M66 Simister Island scheme.	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
Regulation 18 4(b) requires an Environmental Statement to 'include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'.	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.** The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
In addition, Schedule 4 (5) requires a description of the likely significant effects of the development on the environment resulting from, inter alia:	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
(d)the risks to human health, cultural heritage or the environment (for example due to accidents or disasters).	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both A**pplication Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.** The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
Recommendation	

UK Health Security Agency Comment	National Grid's Response
The ES must provide an assessment of significance for those health determinants scoped into the population and human health chapters. The population and human health assessment should draw upon the findings from other relevant chapters, including air quality and noise.	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
As there is not yet a define approach in England to the assessment of significance for population and human health, it is strongly advised that any proposed approach is agreed with OHID/UKHSA and the local Directors of Public Health. The guidance issued by the International Association of Impact Assessment (IAIA)2 could be used as a basis for the assessment of significance.	The methodology for determining the significance of effects is set out in Section 12.4, Approach and Methodology, for both **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. The methodology follows a best practice approach, which includes utilising the new IEMA guidance for determining significance for human health in EIA, which was published in November 2022, following the publication of the scoping report in October 2022.
Health Baseline Data	
The scoping report indicates health baseline data will be drawn from OHID Fingertips data. Local data sets and publications may assist in providing data to understand baseline and inform sensitivity, for example the Joint Strategic Needs Assessment (JSNA), Health and Wellbeing Strategy and any Integrated Care System (ICS) strategies.	The response has been noted. Local data sets and publications have been considered, where relevant, across **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.**
An approach to the identification of vulnerable populations has not been provided. The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics.	Vulnerable and sensitive sub-populations have been identified where relevant within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.**
The identification of vulnerable populations and sensitive populations should be considered.	Vulnerable and sensitive sub-populations have been identified where relevant within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.**
Recommendation	
Baseline data should include consideration of local health priorities published through the Joint Strategic Needs Assessment (JSNA), Health and Wellbeing Strategy and any Integrated Care System (ICS) strategies.	Local health priorities are considered in the Baseline Conditions and Assessment of Effects within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing.**
Baseline health data should be provided, which is adequate to identify any local sensitivity or specific vulnerable populations. The identification of vulnerable populations should be based on the list provided by the Welsh Health Impact Assessment Support Unit3 and the International Association of Impact Assessment (IAIA)4	Vulnerable and sensitive sub-populations have been identified where relevant within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**. The list from the Welsh Health Impact Assessment Support Unit and the International Association of Impact Assessment has been considered.

1.35 London Borough of Bexley

Table 1.34 London Borough of Bexley

London Borough of Bexley Council Comment	National Grid's Response
I write to you following receipt of your letter dated 25th October 2022 which invites the London Borough of Bexley to comment on a Scoping Opinion relating to the above referenced Nationally Significant Infrastructure Planning application.	Noted, no further response required.
Having reviewed the documentation submitted, due to the location of the development the Council have no comment to make on this matter.	Noted, no further response required.

1.36 Trinity House

Table 1.35 Trinity House

Trinity House Comment	National Grid's Response
I can confirm that Trinity House are content with the Scoping Report and confirm we have no further comments to make at this stage.	Noted, no further response required.

1.37 National Highways

Table 1.36 National Highways

National Highways Comment	National Grid's Response
In respect to this proposal the A14 which we look after is crossed or could be potentially affected by construction traffic. It is unlikely that once the proposed transmission line is complete that there will be any impact upon the SRN we do not object to the principle of the electricity transmission network proposed by the Sea Link	Noted, no action/ response required
We appreciate the scheme is at an early stage of design and construction is some way off. We will need to agree how and where cables cross our network, you will also need to assess construction traffic impact upon the network and if necessary, mitigate, at this stage it is difficult to comment other than in broad principals as it will depend on where, when and how much traffic is generated by the construction activity.	For the Kent Onshore scheme, the Proposed Project is not expected to result in any adverse impacts on National Highways' network which falls a considerable distance outside of the traffic and transport study area. For the Suffolk Onshore scheme, The proposal is not considered likely to result in impacts on the SRN during the construction or operational period. However, the non-SRN portion of the A12 between Farnham in the south and Yoxford in the north has been assessed. Details of the likely number and type of vehicles required during all phases of the development are provided in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport,** Section 7.9. No instances of cables crossing the SRN are proposed, and no accesses will be provided from the SRN.
I note that there are other proposals in the area, notably Sizewell, East Anglia Green, management of the cumulative construction impacts of these projects could be an issue as they follow similar time lines and affect similar geographical locations	Based on the assessment carried out within this ES chapter, the Proposed Project is not expected to result in any severe residual cumulative impacts on the road network with the proposed mitigation in place. See **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**

1.39 Eastern IFCA

Table 1.37 Eastern IFCA

Eastern IFCA Comment	National Grid's Response
Suffolk waters are fished primarily for finfish through netting and trawling, as well as crustaceans like crabs and lobsters through the use of pots. Recreational angling is also popular on Suffolk beaches, targeting species such as bass, dogfish, skate and whiting. Commercial fishing activities happening within the scoping boundary have been taken into account by the applicant and suggested mitigation measures towards the fishing industry were mostly based on readily available fishing activity data. In this regard, it needs to be noted that inshore fisheries are often underrepresented in those datasets because of the small size of vessels used (meaning they have not until very recently been required to use vessel monitoring systems) and/or the relatively low quantities landed (catches below a certain weight do not need to be reported). For this reason, EIFCA supports the applicant's proposal to appoint a fishery liaison officer (FLO) in order to maintain dialogue with the industry, inform about the time and spatial boundary of the project and, when possible, minimise impacts. In addition to that, the applicant has included potential disruptions to the fishery – such as displacement of fishing gear, obstruction of fishing routes and damages to target species – in the next step of the scoping report. It needs to be noted that most of these fisheries follow a seasonal trend (such as sole or bass in the summer and cod in the winter months) which, once the works will start, will need to be addressed more specifically to the target species. Of interest to Eastern IFCA are also potential impacts on crab and lobster fishing grounds (Cefas, 2020), which are here harvested by small fishing fleets who usually rely on the local and direct sale of their catch to customers. Eastern IFCA supports the need for a careful consideration of potential impacts on fishing activities in the next stage of the assessment process. Particular attention should be given to cumulative impacts on access to fishing grounds for small, inshore fishing vessels, which already face numerous spatial constraints in a busy sea area, and typically work within a very limited spatial range.	A full assessment on impacts to Commercial Fisheries is presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries.** Impacts to both Static and Mobile gear has been considered in this assessment. A separate cumulative chapter and subsequent assessment of Commercial Fisheries has been undertaken in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** which considers the cumulative impact on fishing grounds with other projects in the study area.
EIFCA considers it very important that developers open and maintain effective dialogue with all fishing interests who may be affected by a project: commercial fishers, especially the fleet which utilises the fishing grounds adjacent to the area of works, recreational fishers and charter boat operators. For this reason, we suggest the applicant develops a genuine two-way dialogue with this sector before the commencement of any operational works in order to notify the mariners and discuss further mitigation where needed. Although Eastern IFCA can offer some assistance with initial communications, it should be noted that IFCAs are fisheries regulators and do not represent the commercial or recreational fishing sectors.	A Fisheries Liaison Officer (FLO) and fisheries working group(s) will be maintained throughout installation to ensure project information is effectively disseminated, dialogue is maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season. Timings of any temporary areas of exclusion from fishing grounds will be clearly communicated via a notice to mariners.
The scoping area of the Project highlights the need to take into consideration important spawning areas and nursery grounds for finfish species, as detailed by the applicant following evidence from Coull et al., 1998; Ellis et al., 2012 and Environment Agency, 2021a, 2021b. In that regard, Eastern IFCA recommends that particular consideration should be given to mitigation in the form of the timing of the works, i.e., suggest avoiding the peak spawning periods. With regards to potential nursery and spawning grounds for crabs and lobsters off the Suffolk coast, Eastern IFCA does not generate its own data, so we defer to the scientific knowledge of Cefas. We also suggest that engagement with local commercial fishermen could help identify more important areas for juvenile fish and shellfish. Finally, we highlight that river estuaries and saltmarsh are important habitats that support fish spawning and nursery life stages, and for this reason, the potential for the proposal to	A spawning assessment for Herring and Sandeel has been undertaken as part of this application and is presented in **Application Document 6.3.4.3.A Appendix 4.3.A Herring and Sandeel Assessment.** Furthermore, **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** as also considers the Coull et al., 1998, Ellis et al. 2012 and relevant EA reports in its assessment of fish and shellfish species. Trenchless installations techniques at both landfalls have been committed to in order to limit impacts to the saltmarsh habitats.

Eastern IFCA Comment	National Grid's Response
affect such habitats should be considered in addition to offshore spawning areas and nursery grounds.	
The Scoping Report for the Project includes potential impacts on other sea users and sea-related recreational activities. More specifically, attention is being given to recreational sea-angling (RSA) happening around that area; Eastern IFCA supports such consideration. However, it needs to be noted that according to ICES (2017), this term is the definition for diverse recreational fishing methods and not only pertains to 'fishing with lines, and in the UK this is almost entirely by line with rod and reel' as stated by the applicant. For this reason, we encourage the planning process to account for all recreational fishing methods occurring in the area, including rod and line fishing but also potting for crabs and lobsters.	**Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** has considered impacts to Marine Tourism and Recreation (Including Fishing ad boating activities) from the Proposed Project.
The scoping report for the SeaLink Project (hereafter referred to as the 'Project') highlights the potential of reducing impacts by placing cables using 'trenchless techniques, if feasible'. Given the early stage of the project, it is not yet detailed by the applicant if the operational plans will allow this technique to be used during the entire duration of the works. For this reason, Eastern IFCA recognises the potential of mitigating impacts but defers its final comments as to when the working plan is going to be finalised. Eastern IFCA is supportive in principle of cable installation by burial as opposed to surface-laying with cable protection since the former is likely to result in fewer hazards and/or nuisance for fishing vessels whose operations necessitate contact with the sea floor.	The primary method of cable installation across the route is burial to a target depth of 1.5-2.5m. Where target depths of lowering cannot be achieved, areas of rock backfill will be required (KP38-KP58, KP81.5-KP 96.5). A technical feasibility study has been undertaken at both landfall to successfully determine the use of trenchless installation techniques in these areas.
The scoping report of the Project does take into account a variety of potential impacts that this, together with other works, might have on environmental receptors. Eastern IFCA supports the developer's commitment to further consider most of these in the full environmental assessment. Our organisation, however, wants to draw particular attention to the potential cumulative effects caused by 'the potential temporal overlap with other piling activities'. Although it is stated that the programme for other such activities is currently unknown, more than just extending the ZOI (Zone of Influence), Eastern IFCA advises the applicant to gather information about these other interconnector projects (e.g., the one proposed by NGV – National Grid Ventures and at the same scoping stage) and other projects in the region, e.g. offshore wind farm construction / cable laying, and liaise with those industries to avoid overlapping and related overloading of influence on the surrounding environment.	**Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** presents the cumulative assessment of the Proposed Project and other projects in the ZOI. This Chapter considers all publicly available information of other projects which are considered. Pilling is not proposed as part of the Offshore Scheme.
Eastern IFCA considers that this first stage of the Project's environmental assessment consistently addresses the potential harms and impacts that could occur to the environment and its biodiversity, regarding both specific species as well as their supporting habitats. The embedded control and management measures, however, 'have not been finalised yet at this stage' and for this reason, Eastern IFCA defers its advice to a later stage of the project when more will be known about the operational phase.	Presented in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice and 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC).**
The location of the proposed Project does present direct and indirect effects on various designated terrestrial and marine protected areas. As regards direct interactions, all proposed marine approaches to the landfall area of search are currently routed through the Outer Thames Estuary Special Protection Area (SPA) and the Southern North Sea Special Area of Conservation (SAC). Similarly, preferred terrestrial routes connecting to the landfall (S2, S3) do impact the Aldeburgh SSSI and North Warren RSPB Reserve.	A full assessment of Designated Sites are presented in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone Assessment.**
Eastern IFCA would support the use of appropriate techniques to minimise impacts on protected areas – for example, as stated by the applicant, through the use of trenchless techniques which, however, still need to be determined whether feasible in the area.	A full assessment of Designated Sites are presented in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone**

Eastern IFCA Comment	National Grid's Response
In addition, Eastern IFCA would highlight how the proposed work could still, indirectly, impact neighbouring designation sites through e.g., sediment displacement and movement (Berry et al., 2003). The following designations might be indirectly impacted: Alde – Ore Estuary, Deben Estuary and Minsmere-Walberswick Ramsar sites; Alde-Ore Estuary and Minsmere-Walberswick SPAs and finally the Alde-Ore Estuary, Minsmere-Walberswick Heaths and Marshes and Leiston Aldeburgh SSSIs. Also, given most of these designations protect avian populations, Eastern IFCA supports the recommendation to prevent the works around the landfall area of search from taking place during bird aggregation peaks or nesting periods.	**Assessment.** Trenchless techniques at the landfalls have been confirmed for both Suffolk and Kent.
Eastern IFCA would also query how the effects of marine electricity links on the marine protected area network have been assessed at a strategic level. We consider the outcomes of such an assessment should be presented in the environmental assessment for the current proposal.	A full assessment of Designated Sites are presented in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone Assessment.**
We defer to the advice and comments of the relevant Statutory Nature Conservation Body in connection with these potential impacts on designated species and habitats, and on the marine protected area network.	No further comment required.
The baseline of the Project was calculated by taking into account the UK's guidance and projections on sea level rise and changing storm conditions. More localised climate change impacts, such as coastal erosion at landfalls, have also been scoped into the next planning phase. With that said, however, the applicant has not specified the emissions input derived by, not only the works but also the running of the proposed project. For this reason, EIFCA highlights the need for further information from the applicant in that regard.	**Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** outlines the Proposed Project Effects on Climate Change.

1.41 Kent Wildlife Trust

Table 1.38 Trinity House

Kent Wildlife Trust Comment	National Grid's Response
Assess cumulative impacts of cables onshore and need for more joint up approach (future and past cables in Kent)	The Proposed Project is coordinating with other large scale infrastructure projects, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to **Application Document 7.10 Coordination Document.** The Proposed Project has been designed to allow space in the surrounding area for the delivery of key infrastructure associated with other projects where it is feasible. The assessment of inter-cumulative effects with these other proposed developments is also considered in the ES within the **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.**
Need to show an environmental and socio-economic evaluation of LL1 to rule the alternative route out completely, whilst factoring in the economic impacts of environmental impacts into all remaining options.	Noted, please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered, Application Document 7.3 Design Development Report** and **Application Document 7.2 Strategic Options Back Check Report** which provides details on the alternative locations considered for the Proposed Project. Further historic information with regard to the Proposed Project design evolution and the alternatives considered are contained within **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**, **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** and **Application Document 8.3 Strategic Options Report (October 2023)**.
Publish OAST tables (KWT non stat response comment 4c and 4d)	Corridor and Preliminary Routeing and Siting Study's have been made available through previous consultations and these reports are available on the National Grid Project Website. For details relating to the options and alternatives assessed for the Proposed Project, please refer to **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered.**
National Grid has not mentioned the harbour seals at Sandwich and Pegwell Bay. The NNR is a seal haul out location which is used all year round. There has been no consideration for the effects of underwater noise on the seals. Additionally, there has been	Additional engagement with Kent Wildlife Trust on Seals in Pegwell Bay has been undertaken. Surveys in Pegwell Bay have been undertaken to supplement **Application Document 6.4.4.4 Part 4 Marine Chapter 4 Marine Mammals.**
Birds use Pegwell Bay throughout the year, so we would expect to see data collected not just for breeding and wintering birds. Intertidal, subtidal, and supratidal surveys should be conducted throughout the year (monthly) to understand how birds are using	The survey scope has been agreed with Natural England and it is considered that an understanding of use from October to c. July is sufficient to understand the impact of the scheme.
A detailed EcIA of functionally linked land (FLL) at Minster Marshes is needed, as these habitats may support birds for which the SPA is designated. Nondesignated land must also be surveyed for birds, as some species move frequently between habitats.	Noted. This is included in the ES and has been discussed with Natural England, the Kent Councils and Kent Wildlife Trust
The proposed route for the overhead line and converter site will directly and indirectly impact Sandwich Bay to Hacklinge Marshes SSSI, Ash Level and South Richborough Pasture Local Wildlife Site (LWS) and Woods and Grassland Minster Marshes LWS. An EcIA	Noted. This has been assessed within **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.**

1.43 JNCC

Table 1.39 JNCC

Trinity House Comment	National Grid's Response
Study area: JNCC agrees with the use of the IAMMWG management units for cetaceans for the purpose of the study area and to create an initial screening list of MPAs. We also agree that the greatest likely Zone of Influence will be in relation to underwater noise. However, we question what known travel distances have been considered when identifying a 50km buffer for screening cetacean designated sites. While we have no concerns with using this distance, we feel it is better justified through routes to impact (i.e. noise propagation and potential behavioural impacts) rather than travel distances of cetaceans, which are wide ranging and not linked to a central point as for seals	Key sites designated for the protection of marine mammals have been initially screened in using the relevant MUs defined by IAMMWG for each species. The sites within each MU have been considered, based on available knowledge of species ecology and connectivity, for relevance to project activities. For cetaceans, relevant guidance regarding the disturbance from underwater sound has been used to determine a preliminary screening distance, whilst for pinnipeds, screening distances have been selected based on known foraging ranges (448 km for harbour seals, 273 km for grey seals).
Proposed assessment methodology: JNCC agree the proposed data sources are appropriate. We also agree with the proposed scope of the assessment (Table 4.5.7) however we presume the 'harm' due to underwater noise refers to injury? We recommend that further discussions are held regarding how the noise assessment will be undertaken.	A full underwater sound assessment is presented in **Application Document 6.4.4.4 Part 4 Marine Chapter 4 Marine Mammals**. Engagement with the MMO has been undertaken in accordance with this assessment.
The species for which the Outer Thames Estuary SPA is designated may be sensitive to the potential impacts of cable laying activities, particularly at certain times of year	For red-throated diver, the Proposed Project is committing to a full seasonal restriction (1 November – 31 March) for offshore cable installation activities in the Outer Thames Estuary SPA and a reduced seasonal restriction (1 January – 31 March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. This will be in place for the purpose of assessing against cumulative effects, rather than the Proposed Project on its own.
There is research regarding the disturbance to red-throated diver from the presence of vessels showing that disturbance can occur up to 2km (Burt et al., 2017, Burger et al., 2019) from a vessel. In light of this evidence of vessel displacement, we advise that a 2km buffer around vessels is used for the assessment of displacement of red-throated diver	These points are noted. To avoid disturbance to Red-throated Diver, the applicant has committed to a seasonal restriction of 1 November to 31 March for offshore cable installation activities and a seasonal restriction of 1 January to 31 March for cable installation activities at landfall. The HRA will consider these as mitigation and will therefore, be dealt with at the Appropriate Assessment stage.
For seabirds the most up to date survey data collected in 2017 at the Outer Thames Estuary SPA should be used.	Noted, **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** includes the most up to date data available.
In Section 4.6.4.3 the applicant discusses the baseline surveys that were conducted, which included intertidal and breeding bird surveys, but there is nothing about offshore, marine bird surveys	Offshore bird surveys have not been undertaken specifically for the Proposed Project. The list of data sources used for the Ornithology assessment is presented in **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology.**

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