The Great Grid Upgrade

Sea Link

# Sea Link

**Volume 7: Planning Statement**

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| **Date** | **Issue** | **Status** | **Description / Changes** |
| March 2025 | A | Final | For DCO submission |
| May 2025 | B | Final | Update to correct errors from s51 Advice |
| July 2025 | C | Final | Update to reflect Procedural Decision from the Examining Authority |

# Executive Summary

## Ex1.1 Overview of the Proposed Project and Purpose of this Report

Ex1.1.1 National Grid Electricity Transmission plc (hereafter referred to as National Grid) is applying for a Development Consent Order (DCO) for the Sea Link Project (hereafter referred to as the 'Proposed Project').

Ex1.1.2 The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection from mainland Europe.

Ex1.1.3 The Proposed Project involves the reinforcement of the electricity transmission system in the South East of England and East Anglia. This would be achieved by reinforcing the network with a predominantly 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.

Ex1.1.4 The Proposed Project comprises three elements: the Suffolk Onshore Scheme, the Kent Onshore Scheme and the Offshore Scheme. A detailed description of these elements is provided in Section 4 of this Planning Statement.

Ex1.1.5 This Planning Statement has been prepared to support National Grid's DCO Application which is submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for Energy Security and Net Zero ('the SoS') pursuant to the PA 2008 (H.M Government, 2008). The Planning Statement provides an assessment of the Proposed Project against the policies in the relevant National Policy Statements (NPSs) for Energy, (Overarching National Policy Statement (NPS) for Energy (EN1) (DESNZ, 2024), NPS for renewable energy infrastructure (EN-3) (DESNZ, 2024) and the NPS for electricity networks infrastructure (EN-5) (DESNZ, 2024) as well as the other provisions of the legislation and policies considered important and relevant to the SoS's decision relevant policy and legislative framework. Where appropriate, it references relevant Application Documents which together form the comprehensive and detailed evidence base produced in support of this Application

## Ex1.2 Need for the Proposed Project

Ex1.2.1 Section 5 of this Planning Statement sets out the need case for, and benefits of, the Proposed Project.

Ex1.2.2 The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons:

- the existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore);
- the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport;

- as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses; and
- upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.

Ex1.2.3 The Proposed Project is required particularly to support offshore wind projects, which in turn are required to meet the Government's targets for the connection of up to 50 GW of offshore wind by 2030. This offshore generation is a key part of a strategy for secure, clean and affordable British energy for the long term.

*Ex1.2.4* NPS EN-1 states that there is a critical national priority for the provision of nationally significant low carbon infrastructure. The Proposed Project is 'low carbon infrastructure' in the context of NPS EN-1.

Ex1.2.5 On CNP infrastructure, paragraph 3.3.63 of NPS EN-1 states that "*Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible*."

## Ex1.3 Planning Appraisal of the Proposed Project

Ex1.3.1 Section 6 of this Planning Statement covers aspects relating to the Proposed Project as a whole, covering the following topics: principle of development, good design and climate change.

Ex1.3.2 The principle of development for the Proposed Project has been established through its need case and through the identification of the preferred location for the Proposed Project following a robust site selection process

Ex1.3.3 Section 6.3 demonstrates how the Proposed Project has taken into account the criteria set out in NPS EN-1 in relation to good design.

Ex1.3.4 Section 6.4 presents the assessment of the likely significant effects of the Proposed Project on the climate and climate change and concludes the Proposed Project is compliant with national, local and marine policies relevant to climate change and greenhouse gas emissions.

Ex1.3.5 Sections 7 and 8 of this Planning Statement provides a detailed assessment of the Suffolk and Kent Onshore Schemes, and the Offshore Scheme (respectively), against the relevant NPSs, marine policies and other policies which are likely to be important and relevant to the Secretary of State's decision. Appendix A: NPS Accordance Tables, Appendix B: Marine Plans Accordance Tables and Appendix B: Local Policy Accordance Tables, of this Planning Statement also set out compliance with individual relevant policies.

Ex1.3.6 Through careful design, the Proposed Project seeks to avoid and mitigate impacts on the environment and sensitive receptors.

Ex1.3.7 The analysis of planning compliance demonstrates that the need for the Proposed Project is supported by national planning policy and other national energy policy and that the Proposed Project addresses the relevant national and local planning policies

through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

## Ex1.4 Decision-making and Planning Balance

Ex1.4.1 Section 9 of this Planning Statement provides a summary of the planning balance following a detailed assessment of the Proposed Projects and its likely effects.

Ex1.4.2 This Planning Statement has demonstrated that the Proposed Project is in accordance with NPS EN-1, NPS EN-3 and NPS EN-5. Paragraph 4.1.3 of NPS EN-1 sets out a presumption in favour of granting consent for energy NSIPs. There is also a presumption that the urgent need for CNP infrastructure, such as the Proposed Project, will "*in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy*" (paragraph 4.1.7). The Proposed Project will help meet the urgent need for CNP infrastructure to meet "*energy objectives, together with the national security, economic, commercial, and net zero benefits*" (Paragraph 3.3.63 of NPS EN-1 (DESNZ, 2024)).

Ex1.4.3 None of the limited exceptions in Section 104(4)-(8) of the PA 2008 apply to the decision to be made by the SoS to grant development consent for the Proposed Project. In particular, the adverse impacts that should be afforded weight against the Proposed Project relate to less than substantial harm to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land and intra- and inter-project cumulative effects. These impacts are significantly outweighed by the very substantial public interest benefits of the Proposed Project.

Ex1.4.4 As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Proposed Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia and the South East.

Ex1.4.5 It is clear that there is a compelling case and established need for the Proposed Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development.

Ex1.4.6 The Proposed Project will also deliver other more localised socio-economic and environmental benefits. These include significant ecological enhancements and employment generation during construction.

Ex1.4.7 The analysis of planning policy compliance demonstrates that the need for the Proposed Project is supported by national planning policy, marine policy and other national energy and environmental policy, and that the Proposed Project addresses relevant national, marine and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

Ex1.4.8 In terms of the overall planning balance, the clear and substantial benefits of the Proposed Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.

Ex1.4.9 This Planning Statement has demonstrated that the Proposed Project is in accordance with the relevant national policy statements and local policy considered to be important

and relevant and that substantial weight should be given to need when considering applications for consent under the PA 2008. Given the above, there is a clear and compelling case for the Sea Link DCO to be made.

# 1. Introduction

## 1.1 Introduction

1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East of England and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as an addition to new interconnection with mainland Europe.

1.1.2 The Proposed Project involves the reinforcement of the electricity transmission system in the South East of England and East Anglia. This would be achieved by reinforcing the network with a predominantly High Voltage Direct Current (HVDC) Link between the proposed Friston Substation[1] in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.

## 1.2 Need for the Project

1.2.1 The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons:

- the existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore);
- the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport;
- as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses; and
- upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.

1.2.2 The transmission system in East Anglia was built primarily to serve consumer demand from homes and businesses in the region. For many years the only significant power stations generating in the East Anglia region were the Sizewell A and the Sizewell B nuclear power stations, Spalding North and Sutton Bridge gas fired power stations, and some further smaller 132 kV connected gas fired power stations.

1.2.3 This generation capacity has recently been increased due to several offshore windfarms, with the existing generation in East Anglia totalling 7,687.4 MW of installed capacity. This is expected to grow substantially in coming years, with connection agreements being signed for 27,329.3 MW of new installed capacity in the East Anglia

[1] The name 'Friston Substation' is used throughout the Proposed Project's DCO Application solely as a geographic term to identify the site of the substation at Friston, The use of the term is not intended to establish a permanent name for this substation; National Grid has committed to engage with the local community over a permanent name for this substation, and will continue this process in parallel to the DCO Application.

region, over three times that capacity installed at present. These connection agreements comprise a large volume of offshore wind generation (including East Anglia Offshore Wind), gas-fired generation, energy storage projects, a nuclear power station (at Sizewell C) and additional interconnector capacity. Without reinforcement, the existing network will not be sufficient to accommodate these new power sources.

1.2.4 The Proposed Project is required particularly to support offshore wind projects, which in turn are required to meet the Government's targets for the connection of up to 50 GW of offshore wind by 2030. This offshore generation is a key part of a strategy for secure, clean and affordable British energy for the long term. The need for the Proposed Project is clear and urgent. See **Application Document 7.2 Strategic Options Back Check Report** for more information on the projects to be served and the needs case.

1.2.5 In November 2024, the National Energy System Operator published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (NESO, 2024). This report states that *"Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030."* The Proposed Project is specified as one of those three projects. The critical and urgent nature of the project is therefore also recognized in the strongest terms in a recent report in achieving Clean Power 2030 objectives.

1.2.6 The Planning Act 2008 ('PA 2008') (H.M Government, 2008) states that where a national policy statement has effect, applications must be made on DCO applications in accordance with any relevant national policy statement unless an exception applies (see Section 2.2 for more information). One of these key documents is the Overarching Policy Statement for Energy (NPS EN-1) . NPS EN-1 states that there is a critical national priority for the provision of nationally significant low carbon infrastructure. The Proposed Project is 'low carbon infrastructure' in the context of NPS EN-1.

1.2.7 On CNP infrastructure, paragraph 3.3.63 of NPS EN-1 states that *"Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible."*

1.2.8 Under the section on new electricity networks in NPS EN-1, the document specifically recognises that over the next decade the onshore and offshore transmission network will require *"… substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)."*

1.2.9 National policy is therefore clear both that in general CNP infrastructure is urgent and there is a strong presumption in favour of development consent being granted for those projects. The project team have applied the mitigation hierarchy to minimize residual impacts and the need for the project strongly outweighs those impacts. In addition, the need for the project specifically is also mentioned in NPS EN-1; there are not many projects whose need is set out so explicitly in national policy and reports. The

remainder of this Planning Statement should be read in the context of this very clear and urgent need for the project, and strong policy support for its implementation.

1.2.10 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989 (H.M Government, 1989), National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.2.11 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 *Schedule 9(1)(a) and (b)* requires licence holders, in the formulation of proposals to transmit electricity, to:

*(a) '…have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;' and*

*(b) '…do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.*

## 1.3 Purpose of this Document

1.3.1 This Planning Statement has been prepared to support National Grid's application ('the Application') for a Development Consent Order (DCO) which is submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for Energy Security and Net Zero ('the SoS') pursuant to the PA 2008 (H.M Government, 2008).

1.3.2 The Planning Statement describes the planning policy context and is submitted as part of a suite of supplementary documents which support the Application, in accordance with regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations) (H.M Government, 2009). While regulation 5(2)(q) does not expressly require a Planning Statement to be submitted, National Grid considers that such a document would assist the Examining Authority and the SoS in their consideration and determination of the application, by providing an overview of the Proposed Project and its impacts, and presenting National Grid's consideration of the Proposed Project against the policies in the relevant National Policy Statements (NPSs) for Energy, (Overarching National Policy Statement (NPS) for Energy (EN1) (DESNZ, 2024), the NPS for renewable energy infrastructure (EN-3) (DESNZ, 2024) and the NPS for electricity networks infrastructure (EN-5) (DESNZ, 2024) as well as the other provisions of the legislation and policies considered important and relevant to the SoS's decision.

1.3.3 **Appendix A, NPS Accordance Table** sets out an analysis of compliance with the specific relevant policies within the suite of designated NPSs for Energy.

## 1.4 Overview of the Proposed Project

1.4.1 In summary, the Proposed Project would comprise the following elements:

### The Suffolk Onshore Scheme

- A connection from the existing electricity transmission network via Friston Substation, including the substation itself. Friston Substation already has

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

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

## The Offshore Scheme

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

## The Kent Onshore Scheme

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

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

1.4.3 A more detailed description of the development is contained within Section 4 of this Planning Statement and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

1.4.4 The Suffolk Onshore Scheme parts of the Proposed Project fall within the administrative areas of Suffolk County Council (SCC) and East Suffolk Council (ESC), while the Kent Onshore Scheme parts of the Proposed Project fall within the administrative areas of Kent County Council (KCC), Thanet District Council (TDC) and Dover District Council (DDC). The **Location Plan** (**Application Document 2.2.1**) shows the Order limits for the Proposed Project.

1.4.5 As set out in **Application Document 5.2 Consultation Report**, engagement with the host authorities in Suffolk and Kent was initiated in 2020/early 2021 and has been maintained through regular monthly meetings, in addition to the formal periods of consultation. To facilitate engagement, National Grid and host authorities concluded Planning Performance Agreements (PPA). ESC and SCC signed a joint PPA on 3 May 2024, TDC signed a PPA 17 October 2024, DDC signed a PPA on 31 January 2025 and KCC are due to sign a PPA imminently. The draft DCO and other application documents were shared for comments with the host authorities in Summer 2024; with a number of draft documents also shared in December 2024 and early 2025. Please refer to the draft Statement of Common Grounds for further details on the engagement that has taken place with the host authorities to date (**Application Document 7.4.5 Draft Statement of Common Ground Thanet District Council, Application Document 7.4.6 Draft Statement of Common Ground Dover District Council, Application Document 7.4.7 Draft Statement of Common Ground Kent County Council** and **Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council/Suffolk County Council).**

## 1.5 Requirement for Development Consent

1.5.1 The PA 2008 defines certain thresholds for large-scale development in the fields of energy, transport, water or waste. These are listed in Part 3 of the PA 2008 and are defined as Nationally Significant Infrastructure Projects (NSIP). The Proposed Project did not fall within the definition of an NSIP as defined in the PA 2008 (Section 14 to Section 30 of the PA 2008) (H.M Government, 2008). However, Section 35(1) of the PA 2008 provides the SoS with power to direct that a specific project should be treated a development for which development consent is required under the PA 2008.

1.5.2 Therefore, on 4 March 2022, National Grid submitted a request to the SoS for Business, Energy and Industrial Strategy[2] for a direction pursuant to Section 35(1) of the PA 2008 that the Proposed Project be treated as a development for which development consent is required.

1.5.3 On 31 March 2022, the SoS issued a direction under Section 35(1) of the PA 2008 confirming that the Proposed Project should be treated as a development for which development consent under the PA 2008 is required (a copy of the SoS Section 35 Direction Notice is appended to **Application Document 1.5 Self Completed Section 55 Checklist**). The SoS was satisfied that:

[2] The SoS for BEIS was the relevant SoS at the time of the S.35 request and decision. On 07 February 2023, the SoS and Department for Energy Security and Net Zero (DESNZ) was established to replace the SoS and Department for Business, Energy and Industrial Strategy (BEIS).

- "*The proposed Project is in the field of energy and development will be wholly within England, waters adjacent to England up to the seaward limits of the territorial sea and the Renewable Energy Zone when completed;*
- *The proposed Project does not currently fall within the existing definition of a 'nationally significant infrastructure project' and therefore it is appropriate to consider use of the power in section 35(1) of the Planning Act 2008; and*
- *National Grid Electricity Transmission's request constitutes a 'qualifying request' in accordance with section 35ZA(11) of the Planning Act 2008*".

1.5.4 As a result of this direction, development consent is required for the Proposed Project

## 1.6 Role of National Grid

### National Grid Group

1.6.1 National Grid Group companies sit at the heart of Great Britain's energy system, connecting millions of people and businesses to the energy they use every day. National Grid Group's operations in the UK include: National Grid Electricity Transmission, which owns the high voltage transmission system in England and Wales; National Grid Electricity Distribution (formerly Western Power Distribution), which owns and operates electricity distribution networks in the Midlands, the South West and Wales, and National Grid Ventures, which owns and operates energy businesses in competitive markets, including sub-sea interconnectors. The Applicant for this project is National Grid Electricity Transmission.

### National Grid Electricity Transmission

1.6.2 National Grid Electricity Transmission plc (National Grid) sits within the wider National Grid Group; as discussed above, within the Group there are distinctly separate legal entities, each with their individual responsibilities and roles. The Sea Link Project is being promoted by National Grid. Please note that in this Planning Statement, except when referring specifically to other National Grid Group entities below, the term National Grid is used to refer to National Grid Electricity Transmission.

1.6.3 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989 (H.M Government, 1989), National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.6.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 *Schedule 9(1)(a) and (b)* requires licence holders, in the formulation of proposals to transmit electricity, to:

*(a) '…have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;' and*

*(b) '…do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.*

1.6.5 National Grid is regulated by Ofgem, which sets price controls and monitors how the company develops and operates the network on behalf of consumers.

1.6.6 National Grid owns and manages the national high-voltage electricity transmission system throughout England and Wales. National Grid owns, builds and maintains transmission infrastructure, which includes overhead lines, buried cables and substations, that allows power to move around the country. The key role of this transmission system is to connect the electricity generators' power stations (for example wind or solar farms) with regional Distribution Network Operators (DNO) who then supply businesses and homes. In return for the connection, users of the transmission network pay a tariff to National Grid. This revenue is then used to maintain, improve and invest in the transmission network.

### National Grid Ventures

1.6.7 National Grid Ventures sits outside the core regulated businesses and is unregulated, unlike National Grid, investing in technologies and partnerships that help accelerate the move to a clean energy future. This includes interconnectors that connect the UK with countries across the North Sea, allowing trade between energy markets and efficient use of renewable energy resources. Whilst National Grid Ventures is part of the National Grid Group, it is a separate entity to National Grid Electricity Transmission, subject to different organisational structures and requirements. National Grid Ventures is mentioned here because it is promoting interconnector projects in the area so the distinction is important between National Grid Ventures and National Grid Electricity Transmission.

## 1.7 Environmental Impact Assessment (EIA)

1.7.1 **Application Document 6.14 Scoping Report** for the Proposed Project was submitted to the Planning Inspectorate on the 24 October 2022 in accordance with the Infrastructure Planning (EIA) Regulations 2017 (H.M Government, 2017). The Planning Inspectorate provided **Application Document 6.15 Scoping Opinion** on behalf of the SoS on 01 December 2022. This included a number of aspects that National Grid was to consider when producing the Environmental Statement (ES) and the Application for Development Consent.

1.7.2 As part of the DCO process, applicants are required to undertake consultation with relevant consultees about the project proposals. This feedback is then used to shape the final proposals within the Application for Development Consent. As part of this, applicants are required to provide preliminary environmental information, typically in the form of a Preliminary Environmental Information Report (PEIR), which sets out the information that '*is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development'.* A PEIR was prepared by National Grid as part of the statutory pre-application consultation process required under sections 42 and 47 of the PA 2008 (H.M Government, 2008). The PEIR was published in October 2023, enabling consultees and interested parties to develop an informed view of the environmental effects of the project and provide comments on that basis.

1.7.3 Further details of the consultation stages and the feedback received can be found in the **Application Document 5.1 Consultation Report**. The consultation responses from the environmental organisations that are particularly pertinent to the EIA, are summarised in **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**.

1.7.4 The EIA of the Proposed Project is presented in the form of an ES. The ES submitted with the Application for Development Consent presents the likely significant effects that would result if the Proposed Project was implemented. The mitigation hierarchy has been applied throughout development of the Proposed Project as part of the iterative EIA process. The ES provides a description of the measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant effects on the environment.

## 1.8 Structure of this Document

1.8.1 The remainder of the Planning Statement is structured as follows:

- Section 2 – provides an overview of the decision-making framework, legislation and policy context as well as other important and relevant considerations.
- Section 3 – describes the Order limits and the surrounding areas and summarises the relevant planning history within the Order limits.
- Section 4 – provides a summary of the Proposed Project and its components.
- Section 5 – describes the need for, and the benefits of, the Proposed Project.
- Section 6 – provides an assessment of the project-wide effects against the relevant legislative and policy context as well as other important and relevant considerations.
- Section 7 – provides an assessment of the Onshore Schemes against the relevant legislative and policy context as well as other important and relevant considerations.
- Section 8 – provides an assessment of the Offshore Scheme against the relevant legislative and policy context as well as other important and relevant considerations.
- Section 9 – provides an assessment of the overall planning balance of the Proposed Project and overall conclusion in terms of the Proposed Project's compliance with relevant legislation and policy.
- Section 10- provides the references.
- Appendix A: NPS Accordance Tables – sets out an appraisal of the Proposed Project against the policies in the Energy NPSs.
- Appendix B: Marine Policy Statement (MPS) Accordance Table – sets out an appraisal of the Proposed Project against the policies in the MPS.
- Appendix C: Local Policy Accordance Tables – sets out an appraisal of the Proposed Project against relevant and important local policies.
- Appendix D: Heritage Statement - sets out the assessment of harm that the Proposed Project may have on terrestrial designated heritage assets, and on non-designated terrestrial heritage assets where the EIA has identified a level of impact that might result in harm.
- Appendix E: Figures – provides environmental constraints figures and a figure showing the schemes overlapping, or in proximity to, the Proposed Project.
- Appendix F: AONB Special Qualities Assessment- provides the assessment of the Proposed Project against the Special Qualities of the AONB in Suffolk.

## 1.9 Relationship of the Planning Statement to the DCO Application

1.9.1 In assessing the Proposed Project against relevant policy, and demonstrating the overall planning case for the Proposed Project, this Planning Statement draws upon the conclusions of other documents accompanying the Application for Development Consent, interpreting them as necessary within the context of relevant policy and planning considerations. This Planning Statement, therefore, draws upon and should be read alongside the following documents:

- **Application Document 3.1 draft Development Consent Order:** if approved, it is this document that will grant development consent for the powers and provisions required to construct, operate and maintain the Proposed Project;
- **Application Document 3.2 Explanatory Memorandum**: this explains the purpose of the draft DCO and the powers sought;
- **Application Volume 2 Plans and Drawings**: there are a number of different types of plans, each showing a different element of the Proposed Project, and the Guide to the Plans (**Application Document 2.1 Guide to the Plans**) explains the role of the different plans and factors that should be considered when viewing these plans;
- **Application Document 3.5 Consents and Agreements Position Statement**: this provides information on the additional consents and licences that are, or may be, required to construct and operate the Proposed Project;
- **Application Document 7.2 Strategic Options Back Check Report**; this report provides an overview of the strategic options that National Grid identified and subsequently evaluated for the reinforcement of the network in the South East and East Anglia regions;
- **Application Document 7.4 Statement of Commonality**: this statement provides the Examining Authority with a summary of the current position in respect of each Statement of Common Ground (SoCG);
- **Application Documents 7.4.1 to 7.4.15 Draft Statements of Common Ground**: the draft SoCGs seek to identify matters on which parties agree and to track progress towards the resolution of any matters where agreement has not yet been reached;
- **Application Document 7.3 Design Development Report**: this report provides an overview of the design rationale for the Proposed Project and explains where design choices have sought to reduce the environmental effects of the Proposed Project;
- **Application Document 7.10 Coordination Document**: this document provides an overview of efforts to date to coordinate the Proposed Project with other proposed developments.

1.9.2 **Application Information 1.5 Self Completed Section 55 Checklist** and **Application Information 1.3 Navigation Document** set out the structure of the Application for Development Consent and how it satisfies the relevant requirements of legislation and guidance concerning the preparation, assessment and submission of applications, including:

- The APFP Regulations (H.M Government, 2009);

- The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (H.M Government, 2010);
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") (H.M Government, 2017);
- The Department for Communities and Local Government's Planning Act 2008: Application form guidance (2013) (Department for Communities and Local Government, 2013);
- The Department for Communities and Local Government's Planning Act 2008: Guidance on the pre-application process (2015) (Department for Communities and Local Government, 2015);
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents (August 2024) (The Planning Inspectorate, 2024);
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024) (The Planning Inspectorate, 2024);
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects (April 2024) (The Planning Inspectorate, 2024);
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Acceptance stage for Nationally Significant Infrastructure Projects (April 2024) (The Planning Inspectorate, 2024); and
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on the Consultation Report (April 2024) (The Planning Inspectorate, 2024).

1.9.3 The full schedule of documents submitted with this application is set out in **Application Document 1.4 Electronic Application Index** and **Application Information 1.3 Navigation Document**.

1.9.4 This document should be read in conjunction with **Application Document 1.6 Glossaries & Acronyms** which sets out a list of acronyms and terms used throughout the application documents.

# 2. Legislative and Policy Context

## 2.1 Introduction

2.1.1 This Section outlines the legislative framework and the planning policy context for the Proposed Project. Section 2.2 sets out the relationship of the Proposed Project with the PA 2008 and introduces the national and local planning policy and other documents that the SoS may consider to be important and relevant.

2.1.2 This Section of the Planning Statement is supported by **Appendix A: NPS Accordance Tables, Appendix B: Marine Plans Accordance Tables** and **Appendix C: Local Policy Accordance Tables**, which identify the relevant policies of the NPSs for Energy and local planning policies that the SoS may consider to be important and relevant to their decision, and presents an appraisal of compliance with these policies.

## 2.2 Primary Legislation

2.2.1 The PA 2008 (as amended) forms the basis for decision making for the Proposed Project and is summarised below.

### The Planning Act 2008

2.2.2 As discussed in Section 1.4, on 31 March 2022, the SoS issued a Direction that confirmed that the project should be treated as a development for which a DCO under the PA 2008 (H.M Government, 2008) is required. In the Annex to the Direction, the SoS confirmed his opinion that:

*"The proposed Project is of national significance, taking into account that it is a large-scale linear electricity transmission reinforcement project of approximately 130km in length and that it has a two Gigawatt capacity to transmit electricity."*

2.2.3 Part 6 of the PA 2008 is to be applied when determining an application for a DCO. Sections 103 to 107 of the PA 2008 provide the framework for decision making of an Application for Development Consent. Section 104(2) provides that, in deciding applications for development consent, the SoS must have regard to the relevant NPSs. Section 104(3) states the SoS must decide such applications in accordance with any relevant NPSs unless the exceptions at Section 104(4) to (8) apply. The application of Section 104(3) and Section 104(4) to (8) is discussed in full details in Section 9 of this Planning Statement.

2.2.4 The 2024 versions of EN-1 confirms at paragraph 1.3.10 that "*EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35*". Paragraph 1.6.4(ii) of NPS EN-5 (DESNZ, 2024) also confirms that EN-5 applies to electricity networks infrastructure:

*"If the Secretary of State gives a direction under Section 35 of the 2008 Act (for developments which, when completed, will be wholly in one of more of the areas specified in subsection 35(3)) that it should be treated as an NSIP and requires a development consent order (DCO)"*

2.2.5 Additionally, Section 104(2) of the PA 2008 requires the SoS to have regard to the following, in deciding an Application for Development Consent:

- The appropriate marine policy documents (Section 104(2)(aa) of the PA 2008);
- Any Local Impact Report (Section 104(2)(b) of the PA 2008);
- Any matters prescribed (Section 104(2)(c) of the PA 2008); and
- Any other matters which the SoS thinks are both important and relevant to the SoS's decision (Section 104(2)(d) of the PA 2008).

2.2.6 As detailed above, Section 104(2) of the PA 2008 sets out that the primary policy considerations for NSIPs include any relevant NPS. The NPSs are produced by the Government, pursuant to specific legislative requirements under the PA 2008 to set out policy for nationally significant development in a particular sector and provide the framework for decisions on applications for NSIPs in that sector.

2.2.7 In this case, the recently adopted Energy NPSs are of relevance to the Proposed Project, therefore Section 104 of the PA 2008 applies. The relevant Energy NPSs are set out in the following section.

2.2.8 Schedule 1 of **Application Document 3.1 draft DCO** sets out the description of the works for which consent is sought. Further detail is provided **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

### Marine and Coastal Access Act 2009

2.2.9 A spatial planning system for the management of the marine environment was introduced by the Marine and Coastal Access Act 2009 (MCAA 2009). This introduced a requirement to obtain Marine Licences for works at sea.

2.2.10 The Marine Management Organisation (MMO) is responsible, under Part 4 of the MCAA 2009, for administering marine licensing of activities that include construction or removal of any substance or object in UK territorial waters and for regulating activities where they are undertaken outside of the UK territorial waters e.g. within the UK Exclusive Economic Zone (EEZ). They do so by issuing a Marine Licence.

2.2.11 The Act enables applicants for a DCO to apply for a 'Deemed Marine Licence' as part of the DCO process by virtue of Section 149A of the Act, which was inserted by the MCAA 2009. The draft DCO includes a deemed Marine Licence, which covers all the proposed works at sea.

2.2.12 In addition, Section 126 of the MCAA 2009 sets out that where a public authority has the function of determining an application that is capable of affecting (other than insignificantly) the protected features of a Marine Conservation Zone (MCZ), or the processes on which those features depend, then they have a duty to consider MCZs during their decision making. Details of any MCZs relevant to the Proposed Project are given in **Application Document 6.11 Marine Conservation Zone Assessment.**

## 2.3 Relevant National Policy Statements

2.3.1 This Planning Statement considers the conformity of the Proposed Project with the NPSs listed below.

- Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (2024) (DESNZ, 2024);
- National Policy Statement for Renewable Energy Infrastructure EN-3 (NPS EN-3) (2024) (DESNZ, 2024); and
- National Policy Statement for Electricity Networks Infrastructure EN-5 (NPS EN-5) (2024) (DESNZ, 2024).

2.3.2 The three NPSs referred to above came into force on 17 January 2024 and provide the primary basis for decisions taken by the SoS on applications received for electricity network infrastructure as required by Section 104(2) of the PA 2008 unless the exceptions at Section 104(4) to (8) apply. They were prepared specifically to address the balance of impacts and benefits likely to result from energy projects that are of such a scale that their contribution to meeting government objectives is of national significance. As such, National Grid considers NPS EN-1, NPS EN-3 and NPS EN-5 to be the NPSs relevant to the determination of the Application for Development Consent, and to form the primary decision-making framework for the Proposed Project.

2.3.3 NPS EN-1 sets out the general principles and impacts to be taken into account for all types of energy NSIP development. It forms the primary basis for determining if development consent should be granted for development in the energy sector. The assessment principles (part 4) and generic impacts (part 5) set out a framework of considerations for energy technologies. Paragraph 3.3.62 states "*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*". Paragraph 3.3.63 adds further "*Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible".*

2.3.4 NPS EN-3 sets out planning policy for renewable energy generating NSIPs. Under Paragraph 1.6.3, infrastructure covered by NPS EN-3 includes "…*offshore transmission infrastructure projects in English waters which are directed into the NSIP regime under section 35 of the Planning Act 2008. This would include… … 'bootstraps' to support the onshore network which are routed offshore*." The Proposed Project is a 'bootstrap' of the type covered by NPS EN-3. The content of NPS EN-3 is therefore relevant to the Proposed Project, in particular, in relation to the proposed Offshore Scheme.

2.3.5 NPS EN-5 principally covers high voltage long distance transmission and distribution infrastructure. Paragraph 1.1.4 recognises that new network infrastructure is needed in support of the development of generation by other technologies, including those in EN-3. Paragraph 1.1.5 states that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. NPS EN-5 is clear at paragraph 1.6.4 that it applies to offshore transmission infrastructure of any type, underground cables at any voltage and associated infrastructure where a Section 35 Direction is in place; making it clear that the project is within the 'scope' of EN-5 for the purpose of interpreting CNP policy in EN-1. Part 2 of this document sets out assessment and technology specific information.

2.3.6 **Appendix A: NPS Accordance Table** sets out an analysis of compliance with the specific policies of the suite of relevant designated National Policy Statements for Energy.

## 2.4 Marine Policy Documents

### UK Marine Policy Statement (March 2011)

2.4.1 The Proposed Project includes approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay. A Marine Licence is therefore sought for these works. This deemed Marine Licence is included in the draft DCO and therefore the Marine Policy Statement (MPS) (H.M Government, 2011) is a relevant policy document for the Proposed Project.

2.4.2 The MPS is the framework for preparing Marine Plans and taking decisions affecting the marine environment. It contributes to the achievement of sustainable development in the United Kingdom marine area. It has been prepared and adopted for the purposes of Section 44 of the MCAA 2009 (H.M Government, 2009). The MCAA 2009 requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the MPS unless relevant considerations indicate otherwise. The relevant sections of the MPS include Section 3.3 Energy production and infrastructure development, which states that: "*When decision makers are examining and determining applications for energy infrastructure and marine plan authorities are developing Marine Plans they should take into account: The national level of need for energy infrastructure, as set out in the Overarching National Policy Statement for Energy (EN-1) which applies in England and Wales…*".

2.4.3 It states that marine plan authorities will need to liaise, as appropriate, with terrestrial planning authorities to ensure the development of any necessary onshore infrastructure. This includes onshore substations needed to support offshore electricity generation and connection to the high voltage electricity transmission system.

### East Inshore and East Offshore Marine Plans

2.4.4 The Proposed Project is sited within the East Inshore Marine Plan Area, where the East Inshore and East Offshore Marine Plans (DEFRA, 2014) is relevant. The East Inshore Marine Plan Area includes the area of sea stretching from Flamborough Head to Felixstowe, extending out to the seaward limit of the territorial sea (approximately 12 nautical miles).

2.4.5 This Marine Plan was published in April 2014 and takes account of the Marine Policy Statement (H.M Government, 2011), and also other United Kingdom national policy including the Planning Act 2008 (H.M Government, 2008), National Planning Policy Framework (NPPF) (Department of Levelling Up, Housing and Communities, 2024) (Department of Levelling Up, Housing and Communities, 2024), National Policy Statements, and the procedures for nationally significant infrastructure project consents.

2.4.6 Chapter 3 of the East Inshore and East Offshore Marine Plans sets out policies for development within the East Inshore and East Offshore plan areas.

### South East Inshore Marine Plan

2.4.7 The Proposed Project is also sited within the South East Inshore Marine Plan area where the South East Inshore Marine Plan (DEFRA, 2021) is relevant. The South East Inshore Marine Plan area stretches from Felixstowe in Suffolk to west of Dover in Kent, covering approximately 1,400 km of coastline and extending out to the seaward limit of

the territorial sea (approximately 12 nautical miles) taking in a total of approximately 3,900 km$^2$ of sea.

2.4.8 The Marine Plan (DEFRA, 2021) was published in June 2021 and sets out policies which support the delivery of the plan objectives to achieve the vision and address issues (challenges and opportunities) identified in the south east inshore marine plan area.

2.4.9 **Appendix B: Marine Plans Accordance Table** sets out an analysis of compliance with the specific policies of the Marine Policy Statements.

## 2.5 Local Impact Report

2.5.1 East Suffolk Council, Suffolk County Council, Thanet District Council, Dover District Council and Kent County Council are the host authorities in respect of the Proposed Project and will have the opportunity to prepare Local Impact Reports (LIR) to inform the examination of the Application for Development Consent. The LIR will be considered by the SoS in determining the Application. With reference to Section 60 of the PA 2008 and the Planning Inspectorate's Advice Note One: Local Impact Reports (The Planning Inspectorate, 2024), the LIR would also address relevant local planning policies. The PA 2008 states that in deciding an application for development consent, the Secretary of State must have regard to any LIR submitted to the Secretary of State by the deadline specified.

2.5.2 As part of the examination process, SoCGs will be prepared with the relevant Local Authorities. This will include consideration of policy compliance.

## 2.6 Prescribed Matters

2.6.1 The prescribed matters referred to in Section 104(2)(c) of the PA 2008 (H.M Government, 2008) are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations) (HM Government, 2010). The Decisions Regulations that are of relevance to the Proposed Project are:

- Regulation 3 – Having regard to the desirability of preserving listed buildings, conservation areas and scheduled monuments and their settings where a development would affect these matters. This is considered in Section 7.6 of this Planning Statement, **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,** Section 8.4 of this Planning Statement and **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**.
- Regulation 3A – Deemed consents under the MCAA 2009. Having regard to the need to protect the environment, the need to protect human health, and the need to prevent interference with legitimate uses of the sea. This is considered in Section 8 of this Planning Statement.
- Regulation 7 – Having regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992. This is discussed in Section 7.4 of this Planning Statement, **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.**

## 2.7 Other Important and Relevant Matters

### Introduction

2.7.1 Other national and local policy may also be considered 'important and relevant' to the decision-making process by the SoS. It is considered likely that some parts of the NPPF (Department of Levelling Up, Housing and Communities, 2024) (and associated guidance within the National Planning Practice Guidance (NPPG) (Ministry of Housing, Communities and Local Government, 2016) particularly pertaining to heritage, flood risk and local plans, will be important and relevant to decision making on the Proposed Project.

### National Planning Policy Framework (December 2024)

2.7.2 The NPPF (Department of Levelling Up, Housing and Communities, 2024) was updated in December 2024. It sets out the Government's planning policies for England and is a material planning consideration in the determination of planning applications under the Town and Country Planning Act 1990 (TCPA 1990) (H.M Government, 1990).

2.7.3 Paragraph 5 makes it clear that the NPPF does not contain specific policies for developments requiring development consent and that applications in relation to developments requiring development consent are to be determined in accordance with the decision-making framework set out in the PA 2008 (H.M Government, 2008) as set out in Section 2.2 above. On this basis the NPPF is considered to be generally of less relevance to the SoS than the relevant Energy NPSs. However, the NPPF is capable of being an important and relevant consideration in the SoS's decision-making for NSIPs and as such, compliance in relation to its policies, where relevant, is set out in Sections 6 and 7 of this Planning Statement.

2.7.4 The NPPF is supported by the NPPG and NPS EN-1 (DESNZ, 2024) does include footnote references to the NPPG. Reference to the NPPF and NPPG is made in respect of relevant matters within Sections 6 and 7 of this Planning Statement.

## 2.8 Local Planning Policy

2.8.1 Policies in Local Plans are frequently considered important and relevant matters that can influence the content of LIRs and which the SoS will have regard to in its decision making in accordance with the PA 2008 (H.M Government, 2008).

### Adopted Planning Policy

2.8.2 The Proposed Project lies within the administrative areas of SCC, KCC, ESC, TDC and DDC. The following documents form the Development Plan for the land within which the Proposed Project is located:

#### Suffolk County Council

- Suffolk Minerals & Waste Local Plan; Adopted 9 July 2020 (Suffolk County Council, 2020)

### East Suffolk Council

- Suffolk Coastal Local Plan (SCLP); Adopted 23 September 2020 (East Suffolk Council, 2020)
- Saxmundham Neighbourhood Plan; Made 26 July 2023 (Saxmundham Town Council , 2023)

### Kent County Council

- Kent Minerals and Waste Local Plan 2013-30; Adopted September 2020 (Kent County Council, 2020)
- Kent County Council – Mineral Sites Plan; adopted September 2020 (Kent County Council, 2020)
- Kent County Council – Pre-submission draft of the Kent Minerals and Waste Local Plan 2024-2039 – Regulation 19 (Kent County Council , 2024)

### Thanet District Council

- Thanet Local Plan (TLP); adopted 9 July 2020 (Thanet District Council, 2020)

### Dover District Council

- Dover District Local Plan (DDLP) to 2040; adopted October 2024 (Dover District Council, 2024)
- Ash Neighbourhood Plan; made 15 September 2021 (Ash Parish Council , 2021)

## Supplementary Planning Documents (SPD)

2.8.3 The following SPDs are considered relevant to the Proposed Project:

### East Suffolk Council

- Nature conservation Supplementary Planning Guidance (September 1998) (East Suffolk Council, 1998)
- Historic Environment SPD (June 2021) (East Suffolk Council, 2021)
- Sustainable Construction SPD (April 2022) (East Suffolk Council, 2022)
- Coastal Adaptation SPD (September 2023) (East Suffolk Council, 2023)

### Kent County Council

- Kent Design Guide SPD (December 2006) (Kent County Council, 2006)

## Emerging Planning Policy

2.8.4 Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (H.M Government, 2012) local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. This is also mirrored in the NPPF (Department of Levelling Up, Housing and Communities, 2024).

2.8.5 It is well established that where an adopted Local Plan is out of date, or emerging planning policy is at an advanced stage and is considered important and relevant, emerging planning policy can be a material consideration in the determination of planning applications and, in appropriate circumstances, can outweigh the provisions of an adopted plan. The same principle can apply to applications for development consent and can lead to emerging policies becoming important and relevant matters.

2.8.6 The Kent Minerals and Waste Local Plan 2024 to 2039 was submitted to the SoS for independent examination on 17 May 2024 and the Inspector's Final Report was issued to the Council on 12 February 2025. According to the Minerals and Waste Local Development Scheme 2024 (Kent County Council , 2024), the Kent Minerals and Waste Local Plan 2024 to 2039 will be adopted in March 2025.

2.8.7 The relevant policies within this emerging plan are included at **Appendix C**, as they may be considered important and relevant.

## 2.9 Other Legislation, Policy and Documents Considered to be Important and Relevant

2.9.1 There are other national legislation and policy documents relating to the energy sector and climate change. These include the following:

- The Energy Act (October 2023) (H.M Government, 2023): this act introduced new laws to help ensure energy is affordable for households and businesses and to make the UK more energy independent in the long-term;
- The Electricity Act 1989 (H.M Government, 1989): Section 9(2) of this act requires transmission licence holders such as National Grid to develop and maintain an efficient, coordinated and economical system of electricity transmission, as well as to facilitate competition in the supply and generation of electricity;
- The Environment Act 2021 (H.M Government, 2021): this act makes statutory provisions for targets, plans and policies for protecting and enhancing the natural environment in England and Wales;
- The Climate Change Act 2008 (H.M Government, 2008) and the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (H.M Government, 2019): these set a new target to cut greenhouse gas emissions by 100% (against the 1990 baseline) and achieve net zero by 2050;
- The Countryside and Rights of Way Act 2000 (H.M Government, 2000): this act contains measures to improve public access to the open countryside and registered common land and provides a basis for the conservation of biological diversity and for better management of Areas of Outstanding Natural Beauty (AONB)
- The Natural Environment and Rural Communities Act 2006 (H.M Government, 2006): this act establishes Natural England as an independent body responsible for conserving, enhancing and managing England's natural environment for the benefit of current and future generations and makes provision in respect of biodiversity, pesticides harmful to wildlife and the protection of birds, and in respect of invasive non-native species;
- The Wildlife and Countryside Act 1981 (as amended) (H.M Government, 1981): this act provides the primary legislation in Great Britain for the protection of flora, fauna and the countryside;

- The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (H.M Government, 1990): this act provides specific protection for buildings and areas of special architectural or historic interest;

Other relevant documents:

- Progress Report to Parliament Climate Change Committee 2023 (Climate Change Committee, 2022): this statutory report provides a comprehensive overview of the UK Government's progress to date in reducing greenhouse gas emissions;
- Powering Up Britain: Energy Security Plan (March 2023) (H.M Government, 2023): this plan sets out the steps the government is taking to ensure the UK is more energy independent, secure, and resilient;
- Environmental Improvement Plan 2023 (H.M Government, 2023): this plan is the government's first revision of the 25 Year Environment Plan and it provides a comprehensive delivery plan for the government's approach to halting and then reversing the decline in nature;
- British Energy Security Strategy (2022) (Department for Business, Energy and Industrial Strategy, 2022): this sets out the key actions to accelerate delivery of clean energy, recognising the importance in delivering our climate goals whilst simultaneously providing energy security and securing greater energy independence;
- Mission Zero – the Skidmore Review (January 2023) (Department for Energy Security and Net Zero, 2023): this independent review considered how the net zero target could maximise economic growth while also increasing energy security and affordability for consumers and businesses;
- Net Zero Strategy: Building Back Greener 2021 (H.M Government, 2021): this strategy sets out policies and proposals for decarbonising all sectors of the UK economy to meet our net zero target by 2050;
- Net Zero: Opportunities for the Power Sector (2020) (National Infrastructure Commission, 2020): this paper sets out updated evidence and analysis of the electricity system in the context of the 2050 net zero greenhouse gas emissions target;
- Energy White Paper: Powering our Net Zero Future (2020) (Department for Energy Security and Net Zero, 2020): this paper outlines the Government's plan to support the UK in becoming a net zero greenhouse gas emitting country by 2050; and
- National Infrastructure Strategy (2020) (H.M Treasury, 2020): this paper sets out the Government's plan to deliver on its ambition to "*deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country… and put the UK on the path to net zero emissions by 2050*".
- Clean Power 2030 (2024) (National Energy System Operator, 2024): this report presents the NESO's analysis on the foundations for clean power, the core elements of a clean power system, our pathways, critical enablers and the benefits and costs. The report states that the Proposed Project is critical to the delivery of a network that supports the clean power pathways.

## 2.10 Pre-Application Consultation

2.10.1 Sections 42 and 47 of the PA 2008 requires applicants for development consent to carry out formal (statutory) pre-application consultation on their proposals. There are several requirements on how this consultation must be undertaken that are set out in the PA 2008 and related regulations.

2.10.2 National Grid has undertaken extensive consultation throughout the development of the Proposed Project, and this is ongoing. This is described in **Application Document 5.1 Consultation Report** and its supporting appendices, and includes the stages listed below:

- Between 24 October and 18 December 2022 an initial non-statutory consultation was held. This was an opportunity to explain why the reinforcement is needed, set out the options considered, and receive early feedback.
- Between 24 October and 18 December 2023 a statutory consultation on the refined proposals for Sea Link was held.
- Targeted Consultation took place from 8 July to 5 August 2024 to consult on a small number of refinements on the Proposed Project.

2.10.3 Local Engagement took place from 22 November 2024 to 12 January 2025 on a number of changes introduced to the Proposed Project following the feedback received at Targeted Consultation as well as further technical and environmental assessment works. National Grid has had regard to all feedback it has received in response to its consultations when developing the Proposed Project. This is described in the **Application Document 5.1 Consultation Report** and the **Application Document 5.1.1 to 5.1.9 Consultation Report Appendices.**

## 2.11 Additional Consents

2.11.1 A DCO, if granted, has the effect of providing consent for development in addition to a range of other consents and licenses, where specified, as well as removing the need for some consents such as planning permission. Details of the consents and licences included in the draft DCO are explained in **Application Document 3.2 Explanatory Memorandum, Application Document 3.1 draft Development Consent Order** and **Application Document 3.5 Consents and Agreements Position Statement**. The latter also explains the likely consents being sought outside of the DCO.

2.11.2 The draft DCO also includes a deemed Marine Licence, which is required for the offshore works. The Marine Management Organisation has been consulted on the Proposed Project including during statutory consultation as well as on the intention to include a deemed Marine Licence in **Application Document 3.1 draft Development Consent Order**.

## 2.12 Statements of Common Ground

2.12.1 In accordance with guidance published by DCLG, now Ministry of Housing, Communities and Local Government (Department for Communities and Local Government, 2015), National Grid has been developing SoCG with a number of statutory consultees, statutory undertakers and interested parties during the preparation of the Application. The SoCG seek to identify matters on which parties agree and to

track progress towards the resolution of any matters where agreement has not yet been reached.

2.12.2 More information on the SoCG being prepared by the Proposed Project and submitted with the Application can be found in **Application Documents 7.4.1 to 7.4.15 Draft Statements of Common Ground**. A Statement of Commonality (**Application Document 7.4 Statement of Commonality**) has also been prepared which summarises the current position regarding the SOCG.

# 3. The Order Limits and Surrounding Area

## 3.1 Overview

3.1.1 This Chapter provides an overview of the Order Limits and surrounding area. It describes the location and context within which the Proposed Project would be constructed and operated and identifies key land use planning issues affecting land within the Order Limits and surrounding area. The Order Limits are the maximum extent of the land required to construct and operate the Proposed Project.

3.1.2 A full description of the Proposed Project is available in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and a summary is provided within Chapter 4 of this document.

3.1.3 The Order Limits include the necessary access points, storage and welfare facilities, and space to accommodate the movement of construction plant and machinery to construct the Proposed Project. They comprise onshore elements in Suffolk (the Suffolk Onshore Scheme) and Kent (the Kent Onshore Scheme), as well as offshore elements (the Offshore Scheme). The Order Limits are shown on **Application Document 2.5.1 Work Plans – Suffolk, Application Document 2.5.2 Work Plans – Kent,** and **Application Document 2.5.3 Work Plans – Offshore**.

3.1.4 For ease of presentation the Proposed Project has been split geographically into the Suffolk Onshore Scheme, Offshore Scheme, and Kent Onshore Scheme. Figures showing environmental constraints relating to the Proposed Project are provided at **Appendix E Figures** of this Planning Statement (Figures 1 to 7).

## 3.2 Suffolk Onshore Scheme

### Location

3.2.1 The Suffolk Onshore Scheme is illustrated on **Application Document 2.5.1 Work Plans – Suffolk** and is located within the administrative boundaries of SCC and ESC.

3.2.2 The most northernly point of the Suffolk Onshore Scheme is sited to the southeast of Saxmundham along the B1119. Other than the town of Saxmundham, the area is predominantly rural, dominated by large to medium scale agricultural fields of arable crops. To the south of Saxmundham and partially within the Order Limits is the River Fromus.

3.2.3 Moving southeast, the Order Limits are also dominated by large to medium scale agricultural fields and are interspersed with mature woodland areas, small clusters of dwellings and scattered properties. There are large commercial warehouses close to the Order Limits, situated between Saxmundham and Friston.

3.2.4 The Order Limits extend to the north of Friston village and then extend southwards in parallel with Aldeburgh Road and Saxmundham Road towards the North Sea coast. The Suffolk landfall is situated just north of the settlement of Aldeburgh and south of the village of Thorpeness.

3.2.5 Other notable settlements that are located close to the Order Limits include the villages of Leiston, Knodishall Common and Sternfield. The surrounding area is also crossed by major road corridors, including the A1094 and the B1121 – the latter crosses the Order Limits to the north of Aldeburgh, near South Warren. The River Alde flows to the south of the Suffolk Onshore Scheme approximately 300 m at the closest point.

3.2.6 The Sizewell Nuclear Site is located approximately 5 km to the north of the Order Limits. There are two existing 400 kV overhead lines that cross the Order Limits, connecting the existing Sizewell substation to Bramford substation.

## Key Environmental Designations and Allocations

### Within the Order Limits

3.2.7 There are no internationally-designated sites for nature conservation other than where the Order Limits (to the east of the B1122 Leiston Road) include a very small area of the Sandlings Special Protection Area (SPA), since an existing track traversing the SPA would be used for monitoring access and has been included in the Order Limits. The Order Limits also includes an area of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), over a distance of approximately 800 m, upon reaching the Suffolk coastline between Thorpeness and Aldeburgh. This SSSI overlaps with the Aldringham to Aldeburgh Disused Railway Line County Wildlife Site (CWS), The Haven, Aldeburgh Local Nature Reserve (LNR) and the North Warren Nature Reserve run by the Royal Society for the Protection of Birds (RSBP), which are located along the coast and therefore also lie within the Order Limits.

3.2.8 There are a number of ancient and veteran trees within the Order Limits.

3.2.9 There are no designated heritage assets such as World Heritage Sites, Registered Battlefields, Registered Parks and Gardens, Protected Wrecks, Scheduled Monuments or Listed Buildings within the Order Limits. A total of 97 non-designated heritage assets are recorded within the Order Limits.

3.2.10 There are no Regionally Important Geological Sites (RIGS) (also referred to as Local Geological Sites [LoGS]), County Geo-Sites or Geolgocial SSSI's present within the Order Limits.

3.2.11 The Suffolk Landfall and the section of the HVDC underground cable corridor preceding it (and running along the South Warren Golf Course) lie within the Suffolk Coast and Heaths National Landscape. The strip of coastline where the Suffolk Landfall would be located is also part of the Suffolk Heritage Coast.

### Adjacent to the Order Limits

3.2.12 Thirty-three listed buildings have been recorded within 500 m of the Order Limits, of which four are Grade II* (Church of St John the Baptist in Saxmundham, Church of St Mary Magdalene in Sternfield, Church of St Mary in Friston and Post Mill in Friston) and 29 are Grade II. The majority of the Grade II listed buildings are located within the settlements which surround the proposed Suffolk Onshore Scheme, with concentrations in Leiston, Aldeburgh, Thorpeness, Aldringham, Friston, Sternfield and Saxmundham. Aldeburgh, Thorpeness, Leiston and Saxmundham are also Conservation Areas. To the north of Saxmundham there is a Park and Garden of Historic or Landscape Interest (Carlton Park, Kelsale).

3.2.13 There are no Regionally Important Geological Sites (RIGS) (also referred to as Local Geological Sites [LoGS]), County Geo-Sites or geological SSSI present within the surrounding area.

3.2.14 There are two areas of Ancient Woodland within close proximity of the Order Limits (Grove Wood, to the north-east of Friston and Great Wood, to the south of Aldringham).

3.2.15 The Alde-Ore Estuary Ramsar Site / Special Area of Conservation (SAC) / SPA / SSSI is located to the south of the A1094 Saxmundham Road, within 700 m of the Order Limits. As already mentioned, the Order Limits encroach marginally upon the Sandlings SPA, which extends immediately to the north of the Proposed Project and cover the same area as the Leiston-Aldeburgh SSSI.

3.2.16 Several CWS are within close proximity of the Order Limits, with the closest ones being Aldeburgh Golf Course, Great Wood and Grove Wood.

3.2.17 In terms of local plan allocations, the SCLP allocates land to the east and west of the B1121, to the south of Saxmundham (Reference SCLP 12.29) for a mixed use development of 67.8 ha comprising 800 dwellings, community facilities, open space and employment land (Reference SCLP 12.29 South Saxmundham Garden Neighbourhood). As part of this new neighbourhood, the land to the east of the B1121 and adjacent to the Order limits would be used entirely to provide an area of Suitable Alternative Natural Greenspace (SANG).

## Other Environmental and Planning Considerations

### Within the Order Limits

3.2.18 The majority of the proposed Suffolk Onshore Scheme, west of Aldeburgh golf course, consists of arable crops. Numerous scattered mature broadleaved and coniferous trees are present within the Order Limits of the proposed Suffolk Onshore Scheme, as well as areas of neutral grassland (most of which are species-poor and unmanaged)

3.2.19 The Suffolk Onshore Scheme is situated in the hydrological catchments of the Hundred River and the neighbouring River Fromus, which is a tributary of the River Alde. The Hundred River and River Alde, of which the River Fromus is a tributary, support several abstractions for non-potable irrigation water supplies at the local scale. The Hundred River also receives two sewage discharges. The main sources of flood risk within the Order Limits are from the Hundred River, the River Fromus and the River Alde where there are small areas of Flood Zone 2 and 3.

3.2.20 The Order Limits are located within a Mineral Consultation Area as identified on the Proposals Map accompanying SCC Minerals and Waste Local Plan.

3.2.21 Provisional Agricultural Land Classification (ALC) Mapping indicates that the Order Limits of the Suffolk Onshore Scheme comprise of 189.25 ha (67.75%) of Grade 2 and 3a Agricultural Land (**Application Document 6.2.2.6 Part 2 Suffolk Chapter 7 Agriculture and Soils**). The remaining Order Limits comprise Grade 3b and Grade 4 agricultural land as well as other land/ non agricultural land (90.09 ha).

3.2.22 As set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics Recreation and Tourism (Table 10.16),** there are 21 PRoW and recreational routes which pass through the Order Limits and could therefore be impacted by the Suffolk Onshore Scheme.

### Adjacent to the Order Limits

3.2.23 The following national/regional walking and cycling routes are within the surrounding area:

- S-C1: National Cycle Network Route 42;
- S-W1: King Charles III England Coast Path a long-distance footpath between Southwold and Aldborough, Suffolk, forming part of the longest managed coastal path in the world. The cable route will traverse the route of the path using a trenchless method as it passes from the sea to land;
- S-W2: The Suffolk Coast Path; and
- S-W3: Sandlings Walk.

3.2.24 With regards to the local highways network, the area includes the A12, the B1121 to the north and south of Saxmundham, the B1119 and the A1094 to the west of Aldeburgh. The northwest section of the area includes several minor rural roads which predominantly provide agricultural and local access.

## 3.3 Offshore Scheme

### Location

3.3.1 The Offshore Scheme is illustrated on **Application Document 2.5.3 Work Plans – Offshore.** It is located wholly within English Territorial Waters and lies within the East Inshore and South East Inshore Marine Plan Areas.

3.3.2 The Offshore Scheme's Order Limits extend over a length of 122 km from mean high-water springs (MHWS) at the Suffolk landfall, situated just north of the settlement of Aldeburgh and south of the village of Thorpeness, to MHWS at the Kent Landfall, situated approximately 300 m to the south of Cliffsend and slightly to the north of Pegwell Bay Country Park. The Order Limits cross the Suffolk Coastal Waters, East Anglian Shipping Waters, Eastern English Channel Approaches and the Goodwin Sands and North Dover Strait Marine Character Areas (MCA).

3.3.3 The Offshore Scheme is located to the west of London Array Offshore Wind Farm and to the east of Thanet, Greater Gabbard and Galloper Offshore Wind Farms. Parts of the Outer Thames Estuary and Thanet Coast and Sandwich Bay Ramsar and SPAs are located within the Order Limit as well as parts of the Southern North Sea and the Sandwich Bay SACs. Parts of the Leiston Aldeburgh and Sandwich Bay to Hacklinge Marshes SSSI are located within the Order Limits.

### Designations and Allocations

#### Within the Order Limits.

3.3.4 The proposed Offshore Scheme directly passes through the following sites that are designated nationally or internationally for the protection of seabirds and waterbirds: the Outer Thames Estuary SPA, Thanet Coast and Sandwich Bay SPA / Ramsar site, Sandwich and Pegwell Bay National Nature Reserve (NNR), Sandwich Bay to Hacklinge Marshes SSSI, and Leiston-Aldeburgh SSSI. A further six sites intersect with the Study Area, these being Minsmere-Walberswick SPA, Minsmere-Walberswick

Ramsar, Minsmere-Walberswick Heaths and Marshes SSSI, Alde-Ore Estuary SPA, Alde-Ore Estuary Ramsar and Alde-Ore Estuary SSSI.

3.3.5 The Offshore Scheme also passes through the Sandwich Bay SAC and the Southern North Sea (SNS) SAC, which has been designated for the protection of the Annex II species harbour porpoise.

3.3.6 There are no designated sites or known archaeological sites within the Order Limits of the Offshore Scheme. There are currently no maritime or aviation sites within the Order Limits that are subject to statutory protection.

### Adjacent to the Order Limits

3.3.7 The Offshore Scheme adjoins the boundary of the Goodwin Sands MCZ for approximately 3.2 km.

3.3.8 Additional relevant designated sites are located outside of the proposed Offshore Scheme but within the study area are Thanet Coast MZC (located > 1 km southwest of the proposed Offshore Scheme).

## Other Environmental and Planning Considerations

### Within the Order Limits

3.3.9 **Figure 6.4.4.10.2 Marine Recreational Users in the Study Area (Landfalls)** presents the marine recreational users within the Order Limits. The Offshore Scheme crosses through two General Boating Areas, which mainly relate to club training and racing areas, on the approach to both the Suffolk and Kent landfalls. There are recreational boat operators for fishing along the Kent coast. Other recreational activities within the offshore study area include scuba diving, surfing and paddleboards and bathing waters. There is a relatively high amount of fishing activity in the area.

3.3.10 The Offshore Scheme will cross a number of active, planned and out of service cables. Active cables include Nemo link and BritNed submarine power cables, Thanet Offshore Windfarm export cable, East Anglia One export cable and a number of subsea telecommunications cables. Another cable that crosses the Offshore Scheme and is currently under construction is the Neuconnect interconnector. In addition, a number of proposed projects will likely involve a crossing with the Offshore Scheme including Gridlink power cable and the export cables of the proposed East Anglia Three Offshore windfarms and North Falls and Five Estuaries offshore windfarms, as well as a number of proposed, in-service, and out of service subsea telecommunications cables. Kentish Knock, a military practice area, intersects the Offshore Scheme, covering an area of approximately 0.4 $km^2$Adjacent to the Order Limits. There are a number of mineral and aggregate extraction areas, three of which are located within 1 km of the Offshore Scheme (as set out in **Application Document 6.2.4.9 Part 4 MarineChapter 9 Other Sea Users**):

- Outer OTW (528/2) (Hanson Aggregates Marine Ltd)
- Longsand (510/1-2) (CEMEX UK Marine Ltd)
- Shipwash (507/1-6) (CEMEX UK Marine Ltd).

## 3.4 Kent Onshore Scheme

### Location

3.4.1 The Kent Onshore Scheme is illustrated on **Application Document 2.5.2 Work Plans – Kent** and is located within the administrative boundaries of KCC, TDC and DDC.

3.4.2 The Kent Landfall is situated within Pegwell Bay, to the south of Cliffsend and to the north of Pegwell Bay Country Park. Sandwich Road runs in a south-west to north-east direction and passes through the Order Limits to the west of the landfall, continuing towards Cliffsend. To the north-east of Cliffsend, a section of Sandwich Road, from its junction with Pegwell Road to the A299 Hengist Way, is included within the Order Limits; this is to provide secondary access during construction to a compound and facilitate foreshore works, via the existing Pegwell Road access track (which is also included within the Order Limits.

3.4.3 The landscape surrounding the Kent Landfall includes the low-lying coastal areas extending around Pegwell Bay which are characterised by larger intertidal areas of marsh and mudflat along the coastline.

3.4.4 From the Kent Landfall, the Order Limits continue westwards through the northern half of St Augustine's Golf Course, before crossing the A256 (Richborough Way). Richborough Energy Park and a wastewater treatment works (Weatherlees Hill Wastewater Treatment Works) are located approximately 500 m and 130 m respectively to the south of the Order Limits. The Great Oaks Small School, to the north-east of the Weatherlees Hill Wastewater Treatment Works, is immediately adjacent to the Order Limits.

3.4.5 Moving west, the Kent Onshore Scheme is in an area which is semi-rural. The landscape rises towards the settlement of Minster, comprising some comparatively larger scale field enclosures. The railway line connecting Minster (approximately 140 m to the north of the Order Limits) and Sandwich (approximately 2.2 km to the south of the Order Limits) passes through the Order Limits.

3.4.6 The Order Limits cross the River Stour and extend westwards. The existing Richborough to Canterbury 400 kV overhead line crosses through the far western extent of the Order Limits.

### Designations and Allocations

#### Within the Order Limits

3.4.7 The Order Limits pass through the Thanet Coast and Sandwich Bay Ramsar, the Sandwich Bay to Hacklinge Marshes SSSI, the Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA, which cover the area along the coast at Pegwell Bay and Sandwich Flats westwards towards St Augustine's Golf Course. Part of the SSSI extends further westwards towards the railway line.

3.4.8 The Ash Level and South Richborough Pasture Local Nature Reserve overlaps with the proposed Kent Onshore Scheme south of the River Stour, specifically where the new proposed OHL would connect into the existing 400 kV Canterbury to Richborough OHL.

3.4.9 There are no designated heritage assets such as World Heritage Sites, Registered Battlefields, Registered Parks and Gardens, Protected Wrecks, Scheduled Monuments, Listed Buildings or Conservation Areas within the Order Limits.

3.4.10 There are no ancient and veteran trees within the Order Limits.

3.4.11 There are no RIGS, County Geo-Sites or geological SSSI present within the Order Limits. However, The Sandwich Bay to Hacklinge Marshes SSSI is designated as a Geological Conservation Review Site and forms the eastern part of the draft Order Limits, at Pegwell Bay.

3.4.12 The Kent Onshore Scheme is not located within a Minerals Safeguarding Area.

3.4.13 There are no allocations within or close to the Order Limits.

### Adjacent to the Order Limits

3.4.14 Within 5 km of the proposed Kent Onshore Scheme is Princes Beachlands LNR. This is a site designated for a mosaic of habitats that have importance for migrating birds and lies 1.7 km southeast of the Kent Onshore Scheme. There are also four non-statutory local wildlife sites within 2 km of the proposed Kent Onshore Scheme.

3.4.15 A total of ten designated heritage assets were recorded within 500 m of the Order Limits. Nine of which are listed buildings, with the remaining asset being a scheduled monument. The Scheduled Monument is Richborough, which consists of a Saxon shore fort, Roman port and other associated remains dating from the Iron Age through to the medieval period located in an elevated position to the south of the Kent Onshore Scheme. The listed buildings are all Grade II listed, with most dating to the post-medieval period. The majority are farmhouses and associated agricultural buildings.

3.4.16 The Minster Conservation Area lies to the north of Minster approx. 60 m from the Order Limits. Within the Conservation Area lies the Monastic grange and pre-Conquest nunnery at Minster Abbey which is a Scheduled Monument.

## Other Environmental and Planning Considerations

### Within the Order Limits

3.4.17 The vast majority of the proposed Kent Onshore Scheme consists of arable land in active use. The extend of agricultural land at each Agricultural Land Classification (ALC) grade was estimated using a combination of provisional mapping and predictive mapping completed by the team. This process indicated that the Order Limits comprise approximately 85.01 ha (50.11%) of Grade 2 and 3a Agricultural Land. The remaining parts of the Order Limits within the Kent Onshore Scheme are made up of Grade 3b and other land/non-agricultural land.

3.4.18 The Kent Onshore Scheme is situated in the hydrological catchment of the River Stour. The River Stour is a designated main river that rises as the Great Stour in Lenham and flows towards and through Canterbury, where it becomes tidal, finally discharging to the sea at Pegwell Bay. The river has extensive areas of floodplain; parts of the Order Limits to the south and north of the River Stour are within Flood Zone 2 and 3. In addition to the River Stour, within the surrounding area there are networks of watercourses that drain the marshes. Key watercourses include the Minster Stream to the north and the Richborough Stream to the south of the Stour.

3.4.19 There are 10 PRoW which pass through the Order Limits and could therefore be impacted by the Kent Onshore Scheme. In addition, the Cantii Way – a long distance cycle route that operates as a loop across East Kent which is shared within NCN Route 15 is within the draft Order limits.

#### Adjacent to the Order Limits

3.4.20 The following recreational/promoted routes lie within the surrounding area:

- King Charles III England Coast Path – a long-distance footpath between Camber, East Sussex and Ramsgate, Kent, forming part of the longest managed coastal path in the world. The cable route will traverse the route of the path using a trenchless method as it passes from the sea to land.
- Contra Trail – a short-distance route between Ramsgate and Pegwell Bay. In the proximity of the Order Limits, it follows a circular route around Pegwell Bay Country Park
- Viking Coastal Trail – a 50 km circular route on the Isle of Thanet passing along Cottington Road to the east of the A256 in proximity of the Order Limits.
- Saxon Shore Way – a long-distance footpath between Gravesend and Hastings. In the proximity of the Order Limits, it follows the River Stour.

3.4.21 The surrounding area includes a number of roads including the A256 Richborough Way, A299 Hengist Way, Sandwich Road, Jutes Lane, Ebbsfleet Lane, Ebbsfleet Lane North and Brook Lane. The A256 runs in a north-south alignment between Dover in the south where it joins the A2 and Cliffsend in the north where it joins the A299 at the Sevenscore Roundabout.

## 3.5 Relevant Planning History

3.5.1 This section outlines the relevant planning history for the Proposed Project including developments which either extend into or are immediately adjacent to the Order limits. Further detail on these projects can be found in **Application Document 6.3.2.14.A Appendix 2.14.A Descriptions of Other Developments.** Figures 8 and 9 at **Appendix E Figures** of this Planning Statement show the relationship between the Relevant NSIPs which extend into the Order limits and the Proposed Project.

### Suffolk Onshore Scheme

#### Relevant Nationally Significant Infrastructure Projects

##### East Anglia One North

3.5.2 East Anglia One North is a NSIP, comprising an offshore wind farm with up to 67 turbines, generators and associated infrastructure. The project has an installed capacity of up to 800 MW and is located 36 km from Lowestoft and 42 km from Southwold. From landfall the cables will be routed underground to an onshore substation, which will in turn connect into the national electricity grid via the proposed National Grid Friston substation. The consent included consent for the National Grid Friston substation itself. The application was granted Development Consent on 31 March 2022. The applicant is Scottish Power Renewables (SPR).

3.5.3 The Order Limits of the Proposed Project includes the Friston Substation that has been consented as part of East Anglia One North, and there is overlap between the Order limits of East Anglia One North and the Proposed Project in this area for the National Grid Friston Substation and where the two projects have overlapping areas for accesses, construction and grid connection works. National Grid has been working closely with SPR to develop designs and environmental proposals for the Friston Substation site. The National Grid Friston Substation would be constructed and operated by National Grid, whether being constructed under the SPR consent or through a future consent for the Proposed Project.

### East Anglia Two

3.5.4 East Anglia Two is an NSIP comprising an offshore wind farm with up to 75 turbines, generators and associated infrastructure. The project would have an installed capacity of up to 900 MW and is located 37 km from Lowestoft and 32 km from Southwold. From landfall, the cables will be routed underground to an onshore substation which will in turn connect into the national electricity grid via the proposed National Grid Friston substation. The applicant is SPR. The application was granted Development Consent on 31 March 2022. East Anglia Two connects into the cable route for the East Anglia One North project.

3.5.5 Like East Anglia One North, East Anglia Two DCO also included the National Grid Friston Substation is its consented works, with the aim that the first project to progress would develop the substation. Therefore, as above, the Order limits for the Proposed Project overlap with the Order limits for East Anglia Two in the area around the proposed Friston Substation.

### LionLink

3.5.6 LionLink Multi-Purpose Interconnector is a NSIP comprising a proposed electricity link between Great Britain and the Netherlands, that will supply up to 1.8 GW of electricity and will connect to Dutch offshore wind via an offshore converter platform in Dutch waters. It is proposed that the project would involve the construction of a converter station and the installation of offshore and onshore underground direct current cables (HVDC) to the onshore converter station and underground alternating current cables (HVAC) between the converter station and the proposed Friston substation. The applicant is National Grid Ventures. This project is at the pre-application stage, with statutory consultation on the project planned for 2025.

3.5.7 The converter station for Lionlink is proposed near Saxmundham, on the same site as the converter station proposed for the Proposed Project. The converter stations have been proposed on the same site following discussions with key stakeholders and local authorities, who encouraged consideration of how the equipment could be co-located to reduce environmental and community impacts. Significant work has been undertaken to consider masterplanning for the site where the converter stations are located, to increase coordination between projects and consider reduction of cumulative impacts as far as possible at this stage. This masterplan and information on coordination between the projects, and other projects, is provided in **Application Document 7.10 Coordination Document.**

### Nautilus

3.5.8 Nautilus is a NSIP for a subsea electricity cable called an interconnector that could connect up to 1.4 GW of offshore wind to the transmission systems of Great Britain and Belgium. The applicant is National Grid Ventures (NGV).

3.5.9 The project had a connection agreement to connect to the national electricity grid at National Grid Friston Substation and consequently engagement has been ongoing between the Proposed Project and the Nautilus project. This connection may also have required a new converter station at the same site as the Proposed Project and Lionlink, so this had been considered in masterplanning activities to date. Should the project have connected at Friston, there would have been overlaps between the Order limits for Nautilus and those of the Proposed Project.

3.5.10 On 12 November 2024, Ofgem announced that it had approved the Initial Project Assessment (IPA) for the NGV interconnector Nautilus at the Isle of Grain, Kent, rather than at Friston Substation in Suffolk. The IPA is a consultation process run by Ofgem to determine an interconnector project's suitability. Notwithstanding this, NGV retained a connection offer at Friston until this was terminated in March 2025.

3.5.11 This project is at the pre-application stage and the timescales for submission of an application is not yet known.

## Relevant Town and Country Planning Act (TCPA) Applications

3.5.12 Below is a list of relevant applications for planning permission which extend into or are in close proximity to the Order limits. Further information on these applications and permissions can be found in **Application Document 6.3.2.13.A Appendix 2.13.A Descriptions of Other Developments:**

- Agricultural Land Between River Fromus And, B1121, Saxmundham- An application submitted to East Suffolk Council (Reference DC/24/4367/FUL) for a Change of Use From Agricultural Land to Dog Walking and Exercising Facility and Formation of Vehicular Access was approved in February 2025. The proposals are adjacent to the Suffolk Onshore Scheme.
- South Warren Golf Course- An application submitted to East Suffolk Council (Reference: DC/22/2697/FUL) for a change of use of land to extend the South Warren golf course was approved in March 2023. The proposals include landscaping works adjacent to and overlapping the Suffolk Onshore Scheme cable route.

# Offshore Scheme

## Relevant Nationally Significant Infrastructure Projects

### East Anglia Three

3.5.13 East Anglia THREE is a NSIP comprising an offshore windfarm approximately 69 km from the Suffolk coast and an onshore cable route to transport energy to a convertor station in Bramford, with a capacity of 1200 MW. The applicant is SPR. The application was granted Development Consent on 7 August 2017 and is currently under construction. The East Anglia THREE northern export cable corridor crosses the Offshore Scheme at KP 11.354 and southern corridor at KP 14.482.

### North Falls Offshore Wind Farm

3.5.14 North Falls Offshore Wind Farm is a NSIP for an offshore electricity generating station approximately 24.5 km from its nearest point at the Port of Lowestoft. It is estimated to have an installed capacity in excess of 100 MW and will principally comprise offshore wind turbines together with associated infrastructure (onshore and offshore) including a connection to the electricity transmission network. The applicants are SSE Renewables and RWE Renewables. The application was submitted in July 2024 and at the time of writing was at the examination stage. The examination is due to conclude on 28 July 2025. The proposed export cable route intersects with the Offshore Scheme boundary for the Proposed Project.

### Five Estuaries Offshore Wind Farm

3.5.15 Five Estuaries Offshore Wind Farm is a NSIP for an offshore wind farm to generate in excess of 300 MW. The applicant is SSE Renewables and RWE Renewables. The application was submitted to the Planning Inspectorate on 25 March 2024 and the examination closed on 18 March 2025. A decision on the application is due by 17 September 2025. The proposed export cable route intersects with the Offshore Scheme boundary for the Proposed Project.

### NeuConnect Interconnector

3.5.16 NeuConnect Interconnector is a NSIP for proposed 1.4GW capacity offshore multipurpose interconnector project from Wilhemshaven, Germany to the Isle of Grain, Kent developed by Meridam, Allianz Capital and Kansai Electric Power.The NeuConnect HVDC subsea cable crosses the Offshore Scheme at Kilometer Point (KP) 50.672. Construction commenced in 2023 with full operation predicted to commence in 2028 This construction timeline is currently on schedule with the offshore cabling due to commence in 2024.

## Kent Onshore Scheme

### Relevant Nationally Significant Infrastructure Projects

3.5.17 There are no known NSIP projects that extend into or are immediately adjacent to the Kent Onshore Scheme Order Limits.

### Relevant TCPA Applications

3.5.18 Below is a list of relevant applications for planning permission that extend into or are immediately adjacent to the Order Limits. Further information on these permissions can be found in **Application Document 6.3.3.13.A Appendix 3.13.A Descriptions of Other Developments:**

- Stonelees Golf Course Expansion- Planning Permission (Reference: F/TH/20/0648) for the erection of 10 No. detached and 10 No. semi-detached 2-storey holiday homes was approved by Thanet District Council in April 2024. The development is 0.03 km from the Kent Onshore Scheme Boundary.
- Land Adjacent To Southern Water Waste Water Treatment Site - Planning Permission (Reference: F/TH/23/0170) for the installation of a grid stability facility consisting of synchronous compensators and associated electrical infrastructure,

underground cabling, access tracks, drainage, and ancillary infrastructure; was approved by Thanet District Council in August 2023. The red line boundary overlaps with the Kent Onshore Scheme Order limits.

- Weatherlees Hill Wastewater Treatment Works- A request for a Screening Opinion (KCC/SCR/TH/0172/2022) as to whether a proposed solar photovoltaic array required an EIA was submitted to Kent County Council. The decision states that EIA would not be required. The development is 0.03 km from the Kent Onshore Scheme Boundary.
- Richborough Energy Park-
  - Planning Permission (references: F/TH/20/1467 and F/TH/21/0831) for works to the east and the west of the Richborough substation were approved by Thanet District Council in February 2021 and September 2021 respectively. The works are adjacent to the Kent Onshore Scheme cable route.
  - Planning Permission (reference: F/TH/22/0579), for a battery storage facility on land near to the proposed converter station and substation site and Richborough substation was approved by Thanet District Council in September 2022. The works are adjacent to the Kent Onshore cable route.
  - Planning Permission for grid stability infrastructure (reference: F/TH/23/0170) was approved by Thanet District Council in August 2023 on land immediately adjacent to the proposed converter station and substation site within the Kent Onshore Scheme.

# 4. The Proposed Project

## 4.1 Introduction

4.1.1 This Section provides a summary of the main components of the Proposed Project, in the context of **Application Document 3.1 draft DCO** and the proposed construction, operational, and decommissioning activities.

## 4.2 Definition of the Proposed Project in the DCO

4.2.1 Article 3 of **Application Document 3.1 Draft DCO** provides that, subject to the provisions of the Order including the requirements in Schedule 3, development consent is granted for the "authorised development" and for ancillary works.

4.2.2 For this purpose, "authorised development" is defined in Article 2 **of Application Document 3.1 Draft DCO** meaning "*development described in Part 1 of Schedule 1 (authorised project), including any related development authorised by this Order, which is development within the meaning of section 32 of the 2008 Act.*

4.2.3 Schedule 1 of **Application Document 3.1 Draft DCO** applies the following Works Numbers (No.) to the works:

- Works No. 1A to 5 for works within the district of East Suffolk.
- Works No. 6 for works within the districts of East Suffolk and Dover.
- Works No. 7 to 12 for works within the districts of Thanet and Dover.

4.2.4 The following schedules of **Application Document 3.1 Draft DCO** and related plans define, and secure works related to streets:

a. Schedules 5, 6, 7, 8, 9 of **Application Document 3.1 Draft DCO**, **Application Document 2.7.1 Access, Rights of Way and Public Rights of Navigation Plans – Suffolk** and A**pplication Document 2.7.2 Access, Rights of Way and Public Rights of Navigation Plans – Kent** define those streets that are subject to street works and streets and PRoW that would be temporarily closed.

b. Schedule 13 of the **Application Document 3.1 Draft DCO, Application Document 2.6.1 Traffic Regulation Order Plans – Suffolk** and **Application Document 2.6.2 Traffic Regulation Order Plans - Kent** define those streets that would be subject to traffic signals and controls.

4.2.5 The plans set out above are certified documents as set out in Schedule 19 of **Application Document 3.1 Draft DCO**.

## 4.3 Flexibility

4.3.1 Paragraph 4.3.18 of NPS EN-1 states that the worst-case impacts should be considered in order to provide some flexibility in the consent to account for uncertainties in specific project details. This is also reflected in paragraph 2.61 of NPS EN-3.

4.3.2 To maintain flexibility in the design and layout at this stage in the process, and ensure maximum effects are assessed in the EIA and considered by the SoS, the Proposed Project has adopted the Rochdale Envelope approach in accordance with Planning Inspectorate's Advice Note (The Planning Inspectorate, 2018). This involves specifying parameter ranges, including details of the maximum, and where relevant minimum, size (footprint, width, height), technology, and locations of the different elements of the Proposed Project where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst case scenario is presented in the assessment of potential environmental effects from the Proposed Project.

4.3.3 To accommodate unexpected issues in the routeing and siting of infrastructure when more detailed ground investigation information is available, or even during construction, a spatial tolerance has been incorporated into the documents and plans to allow small changes to the location of linear elements of the infrastructure be made; the extent of this tolerance is known as the 'limits of deviation' or LoD. The Order limits for the Proposed Project include areas required for these LoD, which provide the flexibility necessary for project delivery.

4.3.4 In addition, some flexibility is required for non-linear aspects of the Proposed Project, for example the layout of converter stations. Design parameters are therefore applied to state the maximum dimensions and potential locations within the compound.

4.3.5 Further detail on the LoD applied to specific components of the Proposed Project is set out in Section 4.4 of this document.

## 4.4 Components of the Proposed Project

4.4.1 This Section provides a summary of the main components of the Proposed Project with the corresponding Work numbers as specified in Schedule 1 of **Application Document 3.1 Draft DCO** and shown in **Application Document 2.5.1 Work Plans – Suffolk, Application Document 2.5.2 Work Plans – Kent,** and **Application Document 2.5.3 Work Plans – Offshore**.

4.4.2 A full description of the Proposed Project is provided in in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The main components of the Proposed Project are set out below.

### The Suffolk Onshore Scheme

4.4.3 The Order Limits in Suffolk (also referred to as 'Suffolk Onshore Scheme Boundary') are illustrated on **Application Document 2.2.2 Suffolk Location Plan.** The Suffolk Onshore Scheme comprises of:

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed by the Proposed Project.
- A HVAC underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW HVDC converter station approximately 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation

equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.

- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

### Proposed Friston Substation

4.4.4 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 TM41309 61290 as illustrated on **Application Document 2.14.1 General Arrangements Plans - Suffolk**.

4.4.5 Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North Offshore Wind Farm Order 2022' and 'The East Anglia TWO 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.

4.4.6 Should the proposed Friston Substation be installed under one of the consents secured by SPR, the works required for the Proposed Project would be limited to the installation of new Gas Insulated Switchgear (GIS) bays and additional switch gear, Cable Sealing Ends (CSE) and associated outdoor structures, cable connections and bus bars, all within the boundary of the substation, and the routing of the HVAC cables to the substation. This is illustrated indicatively in red on **DCO/S/DE/SS/1200** of **Application Document 2.13.1 Design Drawings – Suffolk**. This is the Friston substation scenario one.

4.4.7 It is currently assumed that in advance of the Proposed Project, permanent access, drainage and some advance planting would be installed as part of the SPR East Anglia ONE and TWO projects.

4.4.8 Should the proposed Friston Substation not be installed pursuant to the current consents secured by SPR, the substation would be constructed by National Grid pursuant to the consent for the Proposed Project, if made by the SoS. The substation would be constructed using gas insulated technology, with a footprint of up to 16,800 square meters. This scenario is considered highly unlikely to occur but has been incorporated into the DCO to ensure the substation can be constructed if neither of the SPR wind farms are developed to the programme required for the Proposed Project. This is the Friston substation scenario two.

4.4.9 The substation is likely to comprise one or more buildings which could house services, storage, workshop, and relay room, along with a backup diesel generator. The substation compound would include hard and soft landscaping, the substation would be enclosed by a fence and would contain a parking area and access road. Friston substation would also include CSE which are vertical structures allowing the cables to exit the ground and connect to solid bars, known as busbars, at approximately 8.45 m height above ground. They would be combined with surge arrestors, metering and other ancillary equipment required to allow for the transition from above ground infrastructure to underground cables.

4.4.10 The proposed infrastructure required for the Proposed Project at Friston is shown indicatively in red on **DCO/S/DE/SS/12010** of **Application Document 2.13.1 Design Drawings – Suffolk**. Further details on the infrastructure required at Friston, in the scenario whereby Friston Substation is built as part of the Proposed Project is available in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

4.4.11 The current intention is that Friston Substation would be constructed pursuant to the SPR consent (scenario one). Construction is planned to commence in 2026, likely prior to a decision being made on the DCO application for the Proposed Project. National Grid is working closely with SPR to provide design information to feed into final management plans and other documents for the discharge of requirements on the SPR consents to enable construction to commence on programme. Under scenario one, whilst Friston Substation would be constructed pursuant to the SPR consent, as a transmission asset it would be constructed by National Grid as an agent to the SPR application rather than by SPR. Scenario two would only occur if the SPR projects do not proceed and Friston Substation is no longer constructed under that consent. The second scenario is considered to highly unlikely to occur.

4.4.12 The parameters for the heights of equipment at Friston Substation are consistent between the two SPR DCOs and the DCO application for the Proposed Project. However, there are intentional differences in how the applications have been put together and the details of proposed controls for three key reasons. Firstly, the design has moved on since the granting of the SPR DCOs in 2022, so the Proposed Project is able to provide more certainty on design elements than was possible in the SPR consents. For example, it is now known that the Friston Substation will be a gas insulated switchgear substation rather than an air insulated switchgear substation, so there is no need for the Proposed Project to include both options as were included in the SPR consents. The gas insulated switchgear substation would require a significantly smaller footprint than the now rejected alternative. The final plans submitted to discharge requirements on the SPR consent will reflect this detail.

4.4.13 Secondly, in the event that the Friston Substation was constructed without the SPR project proceeding there may be differences in how the site is developed because, for example, there may be less won material generated from the construction of the adjacent two SPR substations; and/ or the final Landscape and Ecological Management Plan may be different to account for there being no adjacent development. This is a scenario that the SPR consents did not need to consider.

4.4.14 Finally, the SPR DCOs consent offshore windfarms and the Proposed Project includes converter stations in Suffolk and Kent and 122 km of offshore cable. Therefore, the Friston Substation is a small component of both projects and the majority of the requirements and controls for both projects were written for elements outside the area where the Order limits for the two projects overlap. Even at the Friston site there are three proposed substations, of which only one is part of the Proposed Project. The three projects also have different programmes and drivers; and National Grid is subject to statutory duties and licence conditions that do not apply in the same way to SPR.

4.4.15 For all the above reasons, whilst the parameters for heights of equipment are consistent between the Proposed Project and the SPR consents, there are intentional differences between the controls on development and how they are secured.

4.4.16 Construction of the substation would also require modification works to the adjacent existing 400 kV overhead line. The 4ZW 400 kV route would need to be modified to accommodate a double circuit turn in and out of the proposed Friston Substation. This

would involve removal of one existing 4ZW 400 kV overhead line pylon (4ZW020), and installation of two new pylons on the 4ZW 400 kV overhead line (4ZW020A and 4ZW020B). Installation of approximately two temporary masts would be required to facilitate the connection to the new substation. It could also include the re-conducting of a short length of the 4ZW 400 kV OHL and minor alterations to the pylons approaching Friston Substation (4ZW015 to 4ZW024). The maximum height of the new pylons in Suffolk would be 54 m, plus 6 m LoD, as specified in Article 5 of **Application Document 3.1 Draft DCO.**

4.4.17 Proposed works to the existing 4ZW 400 kV overhead line are shown in **Application Document 2.14.1 General Arrangements Plans - Suffolk.**

4.4.18 A permanent access road is proposed from the B1121 Saxmundham Road to the west of the proposed Friston Substation to allow operational vehicular access to the substation

4.4.19 In addition, landscape proposals at Friston include the provision of extensive species-rich grassland to the north and west of the proposed Friston Substation and woodland planting to the south along Grove Road as shown in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan (oLEMP) – Suffolk.**

4.4.20 The lateral LoD for the Friston Substation is illustrated on **Application Document 2.5 Work Plans - Suffolk**. The shape and arrangement of the converter compound may vary within the LoD however it would not be greater than the 16,800 $m^2$ area indicated. The vertical LoD would include creating a level platform for the works which would involve cut and fill works to create the platform. The maximum height of any buildings or structures on the site above the platform would be 18 m, excluding roof equipment such as lightning rods, handrails and roof mounted plant. This is illustrated in **DCO/S/DE/SS/1206** of **Application Document 2.13.1 Design and Layout Drawings**.

### Proposed HVAC Connection

4.4.21 The proposed HVAC connection would be located between the proposed Friston Substation and the proposed Saxmundham Converter Station via HVAC underground cables. It would be routed northwest from the proposed Friston Substation for approximately 1.9 km.

4.4.22 A typical HVAC construction swathe is illustrated on **DCO/S/DE/SS/1202** of **Application Document 2.13.1 Design Drawings – Suffolk** and a typical HVAC joint bay arrangement is illustrated on **DCO/S/DE/SS/1203** of **Application Document 2.13.1 Design and Layout Drawings**.

4.4.23 Between the proposed Friston Substation and Saxmundham Converter Station the HVAC and HVDC cables for the Proposed Project would be combined within the same construction swathe, this is illustrated on **DCO/S/DE/SS/1204** of **Application Document 2.13.1 Design Drawings – Suffolk**.

4.4.24 The lateral LoD is illustrated on **Application Document 2.5 Work Plans - Suffolk**. No lowest below ground vertical LoD has been specified, this is because to place a limit may unnecessarily restrict below ground works where there is little or no chance of likely significant effects resulting.

### Proposed Saxmundham Converter Station

4.4.25 The proposed Saxmundham Converter Station is located to the east of the settlement of Saxmundham and south of the B1119, centred on Grid Reference TM39773 62263. illustrated on **Application Document 2.14.1 General Arrangements Plans - Suffolk**.

4.4.26 A typical arrangement for the Saxmundham Converter Station is illustrated on Design **DCO/S/DE/SS/1205** of **Application Document 2.13.1 Design Drawings – Suffolk**. The proposed Saxmundham Converter Station would include a DC hall, converter transformers, valve hall, reactor hall, Alternating Current (AC) switchyard, control building, strategic spare parts building, Low Voltage (LV) electricity supply, fire deluge pump house, car parking, a permanent access road and landscaping.

4.4.27 The Saxmundham Converter Station would be up to 6.5 ha in area (excluding landscaping) and the valve halls could be up to 26 m in height excluding lightning protection, aerials, walkways, fall arrest equipment and potential architectural treatments (such as soft landscaping). Typical elevations are illustrated in **DCO/S/DE/SS/1207** and **DCO/S/DE/SS/1208** of **Application Document 2.13.1 Design Drawings – Suffolk**.

4.4.28 Permanent access to the converter station would be taken off the B1121 South Entrance (via proposed bellmouth S-BM09) as shown in **Application Document 2.7.1 Access, Rights of Way and Public Rights of Navigation Plans – Suffolk**.

4.4.29 A new permanent bridge would be required over the River Fromus. Two options are being considered for the bridge as illustrated in **DCO/S/DE/SS/1210** of **Application Document 2.13.1 Design Drawings – Suffolk**: the bridge would have either a 4 m or 2 m clearance from the top of the bank to proposed soffit level, corresponding to a bridge height of up to 6 m or 4 m from the ground level at the abutment to the top of the parapet, respectively Approximate dimensions of the River Fromus bridge crossing structure are shown in Table 4.4 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**

4.4.30 Landscape proposals at Saxmundham Converter station are shown in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**. Consideration is also being given to creating a permissive right of way along the new access to enhance the connectivity of existing PRoW in the area.

4.4.31 The lateral LoD is illustrated on **Application Document 2.5 Work Plans - Suffolk.** The extent of the lateral LoD allows for the necessary flexibility for the design process to continue to develop so that the most suitable position for the Saxmundham Converter Station can be delivered. The shape and arrangement of the converter compound may vary within the LoD however would not be greater than the 65,000 $m^2$.

4.4.32 Article 5 in **Application Document 3.1 Draft DCO** includes a Table of Parameters setting out maximum dimensions for elements of the Proposed Development. The maximum height for the proposed Saxmundham Converter Station is 26 m excluding lightning protection, aerials, walkways, fall arrest equipment and potential architectural treatments (such as soft landscaping) and other roof mounted equipment.

4.4.33 Initial design principles for the Saxmundham Converter Station have been developed alongside consultation and stakeholder feedback. These principles are provided in Table 3.1 of **Application Document 7.12.1 Design Principles – Suffolk.** The approach to design is also covered in **Application Document 7.11.1 Design Approach Document – Suffolk.**

4.4.34 The site for the Saxmundham Converter Station is positioned so that the immediately adjacent sites can accommodate up to two further converter stations which, at the time of selection, were expected to be LionLink and Nautilus.The Nautilus interconnector is now investigating a connection to the National Electricity Transmission System at the Isle of Grain, Kent, rather than at Friston Substation in Suffolk. The Coordination Masterplan appended to **Application document 7.10 Coordination Document** shows how the Proposed Project has been designed so that three converter stations could be delivered within the site, should a third converter station be required.

### Proposed Underground HVDC Cables

4.4.35 The proposed HVDC underground cables would be routed from the proposed Saxmundham Converter Station to the proposed Suffolk Landfall. They would be routed southeast from Saxmundham Converter Station passing to the north of the proposed Friston substation, south of Great Wood and north of the A1094. They would then be routed to the north of Old Broom Covert, Eight Acre Covert and Aldeburgh Golf Course crossing the B1122 Leiston Road. The TJB located to the north of Warren Hill Lane and south of Sandlings Special Protection Area (SPA).

4.4.36 A typical HVDC construction swathe is illustrated on **DCO/S/DE/SS/1209** of **Application Document 2.13.1 Design Drawings – Suffolk** and a typical HVDC joint bay arrangement is illustrated on **DCO/T/DE/SS/1301** of **Application Document 2.13.1 Design Drawings – Suffolk**.

4.4.37 The lateral LoD is illustrated on **Application Document 2.5 Work Plans - Suffolk.** The minimum burial depths are detailed in Table 4.8 of **Application Document 6.2.1.4 ES Part 1 Introduction Chapter 4 Description of the Proposed Project**.

### Suffolk Landfall

4.4.38 This is the transition point from the underground HVDC cable to marine HVDC cable. The Suffolk Landfall is located north of the settlement of Aldeburgh and south of the settlement of Thorpeness. The marine HVDC cables would cross under Leiston-Aldeburgh SSSI, North Warren Royal Society for the Protection of Birds (RSPB) Reserve and Thorpe Road.

4.4.39 The indicative location of the TJB is illustrated on **Application Document 2.14.1 General Arrangement Plans – Suffolk**. Whilst the location of the TJB is indicative within the LoD, there is a commitment to make landfall using a trenchless crossing technique beneath designated sites, the location of the TJB would be located outside of the coastal designated sites of Leiston Aldeburgh Site of SSSI and North Warren RSPB Reserve.

4.4.40 For the Proposed Project four ducts would be installed, one more duct would be installed than for the underground HVDC cable to allow for a spare. Should a section of cable need to be replaced at the landfall this spare duct would allow for a new section of cable to be pulled through rather than a repair to the existing or needing to re install ducts at the landfall.

4.4.41 The lateral LoD is illustrated on **Application Document 2.5 Work Plans - Suffolk**. No lowest below ground vertical LoD has been specified.

## The Offshore Scheme

4.4.42 The Offshore Scheme boundary is illustrated on **Application Document 2.2.1 Overall Location Plan**. The Offshore Scheme includes three distinct components, which are summarised below:

- Suffolk landfall: This is the area where the cable route transitions between the marine and terrestrial environment in Suffolk. This is located between the settlements of Aldeburgh and Thorpeness (further detail provided under Suffolk Landfall section above);
- Marine HVDC cable route: This is the cable route from the TJB at the landfall in Suffolk to the TJB at the landfall in Kent. The marine HVDC cable route is up to 122 km in length; and
- 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 to the south of the settlement of Cliffsend (further detail provided under Kent Landfall section above).

4.4.43 The cable configuration for the Offshore Scheme is assumed to be one bundled HVDC and one fibre optic cable (two cables) in one trench. With a bundled approach, the two cables and the fibre optic cable would be combined into a single bundle as shown in **Application Document 2.13.4 Design Drawings – Offshore.**

4.4.44 The lateral LoD is illustrated on **Application Document 2.5.3 Work Plans – Offshore**. No lowest below seabed vertical LoD has been specified. Whilst a standard below seabed LoD is not proposed, the Proposed Project would never go deeper than necessary for technical or environmental reasons as this would add engineering operational complexity and cost.

## The Kent Onshore Scheme

4.4.45 The Order Limits in Kent (also referred to as 'Kent Onshore Scheme Boundary') are illustrated on **Application Document 2.2.3 Kent Location Plan.** The Kent Onshore Scheme would comprise of:

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

### Proposed HVAC Connection

4.4.46 To facilitate the Proposed Project the existing 400 kV PC route in Kent would need to be modified to accommodate a double circuit turn in and out of the proposed Minster 400 kV Substation. The HVAC connection from the existing Richborough to Canterbury 400 kV overheard line to the proposed Minster 400 kV Substation would be made via a new approximately 3.5 km overhead line (of which 2.2 km would be replacement of existing Richborough to Canterbury connection). The proposed new section of overhead line would be routed to the northeast from the existing Richborough to Canterbury overhead line, crossing the River Stour and a section of railway, and connecting into the proposed Minster 400 kV Substation at approximately Grid Reference TR3216163008.

4.4.47 Pylon heights vary over a length of overhead line. A typical standard height pylon is illustrated on **DCO/T/DE/SS/1304** of **Application Document 2.13.3 Design Drawings – Terrestrial General**. The maximum pylon height within the Kent Onshore Scheme would be 51 m, as set out in Article 5 of **Application Document 3.1 Draft DCO,** plus the LoD specified below.

4.4.48 The lateral LoD is illustrated on **Application Document 2.5.2 Works Plans - Kent**. The vertical above ground LoD is 6 m above the heights specified in Article 5 of **Application Document 3.1 Draft DCO**. No vertical below ground LoD has been specified, this is because to place a limit may unnecessarily restrict below ground works where there is little or no chance of likely significant effects resulting.

### Proposed Minster 400 kV Substation and Minster Converter Station

4.4.49 As the HVAC connection in Kent is being made directly onto the existing Richborough to Canterbury overhead line, there is a requirement for a new substation (hereafter referred to as Minster 400 kV substation) to be sited adjacent to Minister Converter Station. The proposed Minster 400 kV Substation and Minster Converter Station are located to the north of Richbourgh Energy Park and a section of Sandwich Bay to Hacklinge Marshes SSSI, and to the west of the A256. Minster 400 kV substation is approximately centred on Grid Reference TR3216163008 and Minster Converter Station on approximately Grid Reference TR3236963071. The total land needed for the combined area of the proposed Minster 400 kV Substation and Minster Converter Station would be approximately 9 ha.

4.4.50 The indicative location of the Minster 400 kV Substation and Minster Converter Station is illustrated on **Application Document 2.14.2 General Arrangement Plans - Kent**.

4.4.51 An indicative arrangement for the proposed Minster 400 kV Substation is illustrated on **DCO/K/DE/SS/1250** of **Application Document 2.13.2 Design Drawings – Kent** and would comprise a 400 kV substation, anticipated to contain primarily GIS within a GIS building, but also including air insulated elements. The various primary plant and secondary equipment includes, but is not limited to, circuit breakers, disconnectors, earth switches, busbars, and cable interface. A typical 400 kV GIS substation elevation drawing is presented in **DCO/K/DE/SS/1252** and **DCO/K/DE/SS/1253** of **Application Document 2.13.2 Design Drawings – Kent.**

4.4.52 A typical arrangement for the proposed Minster Converter Station is illustrated on **DCO/K/DE/SS/1251** of **Application Document 2.13.2 Design Drawings – Kent**. The proposed Minster Converter Station would comprise of a DC hall, converter transformers, valve hall, reactor hall, AC switchyard, control building, strategic spare parts building, LV electricity supply, fire deluge pump house, car parking, a permanent access road and landscaping. A typical elevation drawing for Minster Converter Station

is presented in **DCO/K/DE/SS/1254** and **DCO/K/DE/SS/1255** of **Application Document 2.13.2 Design Drawings – Kent**.

4.4.53 Permanent access to Minster 400 kV Substation and Minster Converter Station is via a new access point off the A256, north of Jutes Lane bellmouth K-BM02. This is illustrated on **Application Document 2.6.2 Traffic and Regulation Order Plans – Kent.**

4.4.54 Two permanent attenuation ponds are also proposed on the site, as shown in **Application Document 2.14.2 General Arrangement Plans – Kent.**

4.4.55 Landscape proposals at Minster Converter Station are shown in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent**.

4.4.56 The lateral LoD is illustrated on **Application Document 2.5.2 Works Plans - Kent**. The extent of the lateral LoD allows for the necessary flexibility for the design process to continue to develop so that the most suitable position for the Minster 400 kV substation and Minster Converter Station can be delivered. The shape and arrangement of the converter and substation compound may vary within the LoD however would not be greater than the 90,610 $m^2$.

4.4.57 The maximum height for buildings or structures within the proposed Minster 400 kV substation is 20 m above existing ground level as detailed in **Article 5 of Application Document 3.1 Draft DCO**. The maximum height for buildings or structures within the proposed Minster Converter Station is 28 m excluding lightning protection, aerials, walkways, fall arrest equipment, potential architectural treatments (such as soft landscaping) and other roof mounted equipment. This is again specified in **Article 5 of Application Document 3.1 Draft DCO.**

4.4.58 Design principles for the Minster Converter Station have been developed alongside consultation and stakeholder feedback. These principles are provided in Tables 3.1 and 4.1 of **Application Document 7.12.2 Design Principles – Kent.** The approach to design is also covered in **Application Document 7.11.2 Design Approach Document – Kent.**

### Proposed Underground HVDC Cables

4.4.59 The proposed underground HVDC cables would be routed from the proposed Minster Converter Station to the Kent Landfall. From the proposed Minster Converter Station, the HVDC cables would be routed east to the north of Richborough Energy Park and the sewage works crossing the A256 to a TJB located to the west of St Augustine's and Stonelees Golf Club. A typical HVDC construction swathe is illustrated on DCO/S/DE/SS/1209 of **Application Document 2.13.1 Design Drawings – Kent and** a typical HVDC joint bay arrangement is illustrated on DCO/T/DE/SS/1301 of **Application Document 2.13.3 Design Drawings – Kent.**

4.4.60 The lateral LoD is illustrated on **Application Document 2.5.2 Work Plans - Kent**. The minimum burial depths are detailed in Table 4.8 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** No lowest below ground vertical LoD has been specified, this is because to place a limit may unnecessarily restrict below ground works where there is little or no chance of likely significant effects resulting.

### Kent Landfall

4.4.61 This is the transition point from underground HVDC cable to marine HVDC cable. The proposed Kent landfall is located within Pegwell Bay to the south of the settlement of

Cliffsend. The proposed TJB would be located to the west of St Augustine's and Stoneslees Golf Club and the Kent marine HVDC cables would cross St Augustine's Golf course, Sandwich Road, Thanet Coast and Sandwich Bay SPA and Ramsar, Sandwich Bay SAC, Sandwich Bay to Hacklinge Marshes SSSI and Sandwich and Pegwell Bay NNR.

4.4.62 The indicative location of the TJB is illustrated on **Application Document 2.14.2 General Arrangements Plans - Kent.** Whilst the location of the TJB is indicative within the LoD there is a commitment to make landfall using a trenchless crossing technique beneath the saltmarsh habitat within the Pegwell Bay. The location of the TJB and the exit of the trenchless crossing seaward of the mean highwater springs mark (MHWS) would be located outside of the sensitive saltmarsh habitat.

4.4.63 Four ducts would be installed, one more duct would be installed than for the terrestrial HVDC underground cables to allow for a spare. Should a section of cable need to be replaced at the landfall, this spare duct would allow for a new section of cable to be pulled through rather than a repair to the existing or needing to re install ducts.

4.4.64 The lateral LoD is illustrated on **Application Document 2.5.2 Works Plans - Kent**. No lowest below ground vertical LoD has been specified.

## 4.5 Environmental Mitigation

4.5.1 A full list of embedded measures, control and management measures and additional mitigation measures is provided in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC).**

## 4.6 Construction Activities

4.6.1 Full details of the activities associated with the construction of the Proposed Project are set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)** and **Application Document 7.5.2 Outline Offshore CEMP** have been produced, as well as **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice.** These documents together detail how construction would be managed to reduce the environmental effects.

4.6.2 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.

4.6.3 The construction schedule would be developed as the Proposed Project progresses and would take account of seasonal constraints such as protected species breeding or hibernation seasons and reducing impacts associated with flood zones.

4.6.4 In order for the elements of the Suffolk and Kent Onshore Schemes to be constructed, enabling works are required such as the establishment of construction compounds, temporary bellmouths and access tracks and drainage works.

4.6.5 The proposed construction working hours are Monday – Friday: 0700–1900; and Saturday, Sundays and Bank Holidays: 0700–1700. However, there may be some

exceptions to these hours outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. It should be noted that whilst flexibility in hours are required, this does not mean that construction work will take place continuously over these hours.

4.6.6 The staff required during the construction of the proposed works would vary over time. It is anticipated that the peak workforce for the Suffolk Onshore Scheme would be approximately 327 which is expected to peak in 2028. Fewer than 30 peak daily construction vehicles are expected along the B1121 Aldeburgh Road and B1121 Saxmundham Road as a result of S-BM11 and trips associated with this part of the network. The peak workforce in Kent would be approximately 241 which is anticipated to occur in 2030. There will be a daily peak of 254 vehicles including 81 staff vehicles, 65 light goods vehicles (LGVs) and 108 heavy goods vehicles (HGVs) associated with the Proposed Project. The peak Offshore Scheme workforce is expected to be 275 in 2028 and continuing into 2029.

## 4.7 Operational Activities

4.7.1 Full details of the activities associated with the operation of the Proposed Project are set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. A summary is provided below.

### Access

4.7.2 During the operational and maintenance phase, the Suffolk Onshore Scheme will be manned by two operatives across the site at all times, (associated with the operation of the proposed Saxmundham Converter Station and Friston Substation), where six personnel will operate the site divided between three shifts over a 24-hour period, resulting in up to twelve daily car/LGV trips. During the operational and maintenance phase, the Kent Onshore Scheme will be manned by two operatives across the site at all times (associated with the operation of the proposed Minster Converter Station and Minster Substation), where six personnel will operate the site divided between three shifts over a 24-hour period, resulting in up to twelve daily car/LGV trips. There will also be additional infrequent trips associated with monthly or annual maintenance/ inspections or repairs when required. Staff vehicles and those used for maintenance are primarily expected to be pickup trucks and vans, with HGVs accessing the site only rarely for the replacement of equipment.

### Proposed Friston and Minster 400 kV Substations

4.7.3 During operation, the substations will be continuously monitored remotely by National Grid, with regular monthly visits to inspect the site.

4.7.4 External lighting would be installed on the perimeter and within the substations for safety and security purposes and to facilitate maintenance or repair works during the hours of darkness or low light, although the substation would not normally be lit. Additional temporary task lighting will also be used in any area in which maintenance or repair works are being undertaken.

4.7.5 Maintenance would be undertaken on an ongoing basis with individual equipment subject to a three-year maintenance cycle. Maintenance could include visual and physical inspections plus testing, repairing and replacing substation equipment as necessary. In the majority of cases, inspection would require access to the substation

using LGVs and the delivery/removal of a Mobile Elevating Works Platform (MEWP). On the rare occasions where equipment needs to be replaced additional deliveries, vehicles and staff would be required including HGV movements.

## Proposed Converter Stations

4.7.6 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.

4.7.7 There would be regular maintenance visits as part of an annual maintenance campaign. Maintenance could include visual and physical inspections plus testing, repairing and replacing equipment as necessary. In the majority of cases maintenance would require access to the converter station using LGVs and the delivery/removal of a MEWP. On the rare occasions where equipment needs to be replaced additional deliveries, vehicles and staff would be required including HGV movements.

## Proposed Overhead HVAC Connection

4.7.8 During operation the overhead line would transmit electricity from the proposed Minster 400 kV substation onto the existing network in the South East of England. The overhead lines would not require daily attendance from operators. No material is consumed, or machinery required during operation.

4.7.9 The overhead line would be subject to an annual inspection from the ground or by helicopter. The inspection would identify if there are any visible faults or signs of wear and would also indicate if changes in plant or tree growth or development had occurred that could risk infringing safety clearances. Inspections would provide input as to when refurbishment was required. Minor repairs or modifications may be required from time to time.

4.7.10 The overhead line could support telecommunication equipment such as small mobile telephone antennae and would contain optical fibres within the earthwire. If this were to be the case, independent companies would require access for maintenance purposes using pickup trucks and vans.

## Proposed Underground HVAC and HVDC Cables

4.7.11 During operation the HVDC link would transmit electricity from the proposed Friston Substation to the existing network in Kent and vice versa depending on the supply and demand at the time. The underground cables would not require daily attendance from operators.

4.7.12 Maintenance activity along the proposed cable routes would generally 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 above for installation albeit over a much smaller area and scale.

## Noise

4.7.13 The outline noise parameters assessed for the Suffolk Onshore Scheme and Kent Onshore Scheme are provided in the operational noise assessment appendices as set out below.

4.7.14 The noise source data for normal operation of Saxmundham Converter Station is provided in Table 1.4 of **Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment**.

4.7.15 There would be no sources of noise during the normal operation of the Friston Substation because there are no transformers proposed, which are typically the only source of noise at such sites. There would, however, be a backup generator, and gas insulated switchgear (GIS), with noise information of those elements provided in **Application Document 6.3.2.9.E Appendix 2.9.E Suffolk Friston Substation and OHL Operational Noise Information (Informative)**. I

4.7.16 The noise source data for normal operation of Minster Converter Station and Substation is set out in Table 1.4 of **Application Document 6.3.3.9.D Appendix 3.9.D Kent Operational Noise Assessment**.

## Proposed Marine Cable

4.7.17 The Offshore Scheme is designed for a lifespan of approximately 40-60 years. The main operation requirement is for regular monitoring surveys along the installed cable route, which use visual (GVI), where visibility and sensors allow, bathymetric and depth of lowering (cable tracker) data to compare against the baseline survey data. The survey would require high resolution data to be acquired, for use in analysis software for time-series analyses of the seabed changes along the cable route.

4.7.18 As the use of autonomous vehicles for non-intrusive surveys is adopted by the industry, the surveys may be carried out using a range of autonomous surface vehicles (ASVs) and / or autonomous underwater vehicles (AUVs) which reduce the size of any support vessel and allow frequent surveys to be undertaken over the continuous route, or sections of interest. Developments are underway to have ROVs deployed from ASVs which would also allow GVI activities to be carried out with a smaller support vessel and manning levels, as well as less environmental impact. The support vessel would require to be suitable for the operations to be carried out with regard to metocean conditions and marine traffic levels, in full compliance with marine legislation for autonomous vessels.

4.7.19 Providing a comprehensive DOL survey is carried out as the final ‘as-built’ survey, subsequent intermediate surveys may comprise, for instance, of an ASV running along the route using MBES in order to compare and monitor any changes in seabed level (and hence cover over the cable), thus providing a quick and easy monitoring regime. A full survey recording DOL will be required at regular intervals, especially in higher risk areas where the DOL is critical to the protection of the cable (e.g. shipping channels and close to anchorages).

4.7.20 Night-time works are not proposed as standard during the construction phase. However, there may be instances where night-time working is required. This is likely in relation to HDD and cable jointing, where continuous working may be required once started.

## 4.8 Decommissioning Activities

4.8.1 There are no plans to decommission the Proposed Project. Whilst most elements of the Proposed Project have lifespans of approximately 40 years (with the exception of pylons which have a typical lifespan of up to 80 years), these lifespans are likely to be extended given the anticipated increase in electricity demand in the future. The design life of the Proposed Project could be extended with regular maintenance regular maintenance and refurbishment of each component.

4.8.2 In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning would be submitted for approval to the relevant planning authority at least six months prior to any decommissioning works, as set out in Requirement 13 in Schedule 3 of **Application Document 3.1 Draft Development Consent Order**. The decommissioning works would follow National Grid's processes at that point in time, for assessing and mitigating any environmental impacts. Full details of the activities associated with the decommissioning of the Proposed Project are set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Should decommissioning be undertaken, the workforce required for decommissioning of the assets would be lower than the number required during construction with an estimated peak of approximately 150 people required for Kent and 210 people required for Suffolk.

4.8.3 Temporary site compounds and other enabling works would be required similar to that needed during construction. It is anticipated that the temporary site compounds required for decommissioning of the substation and converter station sites would be located in the same location as required during construction.

4.8.4 The working hours for decommissioning activities would be similar to those for construction with a total estimated duration of decommissioning of two years.

4.8.5 The requirements for vegetation clearance during decommissioning will be subject to the extent of vegetation present in proximity of assets at the time and cannot be accurately predicted at this time.

### Proposed Friston and Minster 400 kV Substations

4.8.6 The lifespan of substation equipment is approximately 40 years. If the elements of the proposed Friston substation that form part the Project were no longer required, the equipment would be safely disconnected from the transmission system and carefully dismantled using cranes.

4.8.7 Much of the material would be taken for recycling. Where this is not possible, removed equipment would be disposed of in accordance with the relevant waste disposal regulations at the time of decommissioning.

4.8.8 Similar methods and equipment would be required for dismantling as for construction.

### Proposed Converter Stations

4.8.9 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.

4.8.10 The main components would be dismantled and removed for recycling wherever possible. It will also be evaluated whether the buried cables systems could be used for another purpose. Where this is not possible disposal would be undertaken in accordance with the relevant waste disposal regulations at the time of decommissioning. It is anticipated that the permanent access road would be left *in-situ* whereas the above ground features would be removed to a sufficient depth to allow other practices/construction to occur unhindered.

## Proposed Overhead HVAC Connection

4.8.11 If the Proposed Project is required to be decommissioned, the section of overhead line between the proposed Minster Converter Station site and the existing Richborough to Canterbury 400 kV overhead line would be removed. Fittings such as dampers and spacers would be removed from the conductors. The conductors would be cut into manageable lengths or would be winched onto drums in a reverse process to that described for construction. The fittings would be removed from the pylons and lowered to the ground.

4.8.12 Each pylon would most likely be dismantled by crane, with sections cut and lowered to the ground for further dismantling and removal from site. Depending on the access and space available, it may be possible to cut the pylon legs and then pull the pylon to the ground using a tractor. The pylon could be cut into sections on the ground. Unless there was a compelling need for removal of all the foundations, these would be removed to approximately 1 m deep, sufficient for safe agricultural use of the land and subsoil and topsoil reinstated.

## Proposed Underground HVAC and HVDC Cables

4.8.13 If the Proposed 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.

## Proposed Marine Cable

4.8.14 Requirement 13 applies to the proposed marine cable, ensuring that any future decommissioning would be carried out in line with a decommissioning plan. Sediment transport studies have been commissioned and undertaken by National Grid which outline the short to long term nearshore beach variance and stability at both landfalls. These studies would be used to inform a future decommissioning plan.

4.8.15 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.

4.8.16 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.

# 5. The Need for and Benefits of the Proposed Project

## 5.1 Introduction

5.1.1 This Chapter provides a summary of the need for the Proposed Project and should be read alongside **Application Document 7.2 Strategic Options Back Check Report.**

## 5.2 The Need for the Proposed Project

### National Planning Policy Context

5.2.1 As set out in Section 1.3 of this Planning Statement, the Proposed Project is considered nationally significant and is to be treated as development for which development consent is required, following a direction under Section 35(1) of the PA 2008.

5.2.2 NPS EN-1 (DESNZ, 2024) sets out the Government's policy for the delivery of major energy infrastructure in England and Wales. This includes new electricity transmission and distribution network infrastructure and associated infrastructure such as substations. Section 3 of NPS EN-1 sets out the urgent need for significant amounts of new large-scale low carbon energy infrastructure to meet the Government's energy objectives. In this context, paragraph 3.2.6 of the NPS EN-1 states:

"*The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.*"

5.2.3 For those projects which have a section 35 direction, such as the Proposed Project, paragraph 3.2.12 of NPS EN-1 states:

"*In these circumstances any application would need to be considered in accordance with the NPS. In particular*:(…) *where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.83 of this NPS*"

5.2.4 Paragraph 3.3.62 of NPS EN-1 explains that the "*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure"*. As discussed further below, the Proposed Project is CNP infrastructure.

5.2.5 Paragraph 3.3.63 states that (our emphasis): "S*ubject to any legal requirements,* ***the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts*** *not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible."*

5.2.6 Paragraphs 3.3.65 to 3.3.66 of NPS EN-1 add:

*"There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.*

*The security and reliability of the UK's current and future energy supply is very highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts."*

5.2.7 Paragraph 3.6.68 of NPS EN-1 adds:

*"The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England; substantial reinforcement in London and the South of England to allow for Europe-bound export of excess wind generation from Scotland and the North of England, as well as the importation of energy from Europe to increase resilience during any periods which may be affected by intermittent energy generation mix and as part of the country's transition to increased energy security; and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)."*

5.2.8 Paragraph 4.2.4 of NPS EN-1 reiterates that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The types of project considered as low carbon infrastructure are defined at paragraph 4.2.5 and in the Section 6 Glossary of NPS EN-1.

5.2.9 Bootstraps are defined as low carbon infrastructure and therefore the Proposed Project is nationally significant low carbon infrastructure, which is of CNP, as identified by NPS EN-1. In accordance with paragraphs 3.3.65 and 3.3.66 of NPS EN-1, the Proposed Project will provide the urgently needed reinforcement to the transmission system in the South East of England and East Anglia. NPS EN-5 footnote 32 defines Bootstraps as subsea 'onshore' transmission infrastructure' which is a type of development covered by NPS EN-5.

5.2.10 Reflecting the level and urgency of need for energy infrastructure, paragraph 4.1.3 of NPS EN-1 states that the SoS should start with a presumption in favour of granting consent to applications for energy NSIPs. The presumption applies unless any more specific and relevant policies set out in relevant NPSs clearly indicate that consent should be refused, subject to the provisions of the PA 2008.

5.2.11 Paragraph 4.1.7 goes on to provide guidance to the SoS in making decisions on CNP infrastructure such as the Proposed Project, stating (our emphasis): *"Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development.* ***For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases.*** *This presumption, however, does not apply to residual impacts*

*which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk."*

5.2.12 This Planning Statement shows that none of the exceptions to the presumption in paragraph 4.1.7 apply in this case. The need for the Proposed Project is clear and urgent and effects have been mitigated through the mitigation hierarchy. It is the Applicant's case that the need and benefits of the Proposed Project significantly outweigh the residual effects, even before applying the tilted balance set out in paragraph 5.2.10.

## Need Case

5.2.13 The need case for the Proposed Project is set out in full details in **Application Document 7.2 Strategic Options Back Check Report.**

5.2.14 In June 2019, the UK became the first major economy to pass legislation to end its contribution to global warming and bring all greenhouse gas emissions to net zero by 2050, putting clean growth at the heart of our modern industrial strategy and seizing the economic opportunities that transition to a greener economy creates.

5.2.15 The Government has set out a clear and consistent set of strategic objectives and a long-term policy framework, as detailed in the following publications:

- The Ten Point Plan for a Green Industrial Revolution (H.M. Government, 2020);
- Net Zero Strategy: Build Back Greener (H.M. Government, 2021) and;
- British Energy Security Strategy (Department for Business, Energy and Industrial Strategy, 2022).

5.2.16 Offshore wind energy has an important role to play in delivering this strategy, and a significant step change is required to deliver up to 50 GW of offshore wind energy by 2030, given the current capacity is around 13 GW. Energy networks will be a critical enabler for the clean energy transition; however, the scale and pace of investment needed to meet the UK's decarbonisation targets are significant; for example, achieving the ambition of up to 50 GW offshore wind by 2030 requires industry to deliver over six times the amount of electricity transmission network infrastructure in the next eight years than has been built in the past 30 years.

5.2.17 National Grid sits at the heart of Britain's energy system, connecting millions of people and businesses to the energy they use every day. Overall, National Grid will be investing around £15bn in the UK over 5 years to upgrade our networks and support the UK's net zero ambition. This includes connecting low carbon sources of energy; preparing for the widespread roll out of clean transport and low-carbon heat; and innovating across new technologies needed for an increasingly flexible energy system. National Grid aims to support an affordable and fair transition to net zero, in which nobody is left behind.

5.2.18 The Great Grid Upgrade is the largest overhaul of the electricity grid in generations. National Grid's infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses.

5.2.19 Multiple significant reinforcements are needed to the transmission system up and down the east coast:

- to facilitate the connection of future sources of renewable and low carbon power generation along the coast, such as offshore wind farms, nuclear power, and interconnectors;
- to enable the transport of all this new proposed power from where it is produced to where it is needed, to centres of demand; and
- to meet security of supply quality standards and ensure we can continue to play our part in connecting millions of people reliably to the energy they need every day.

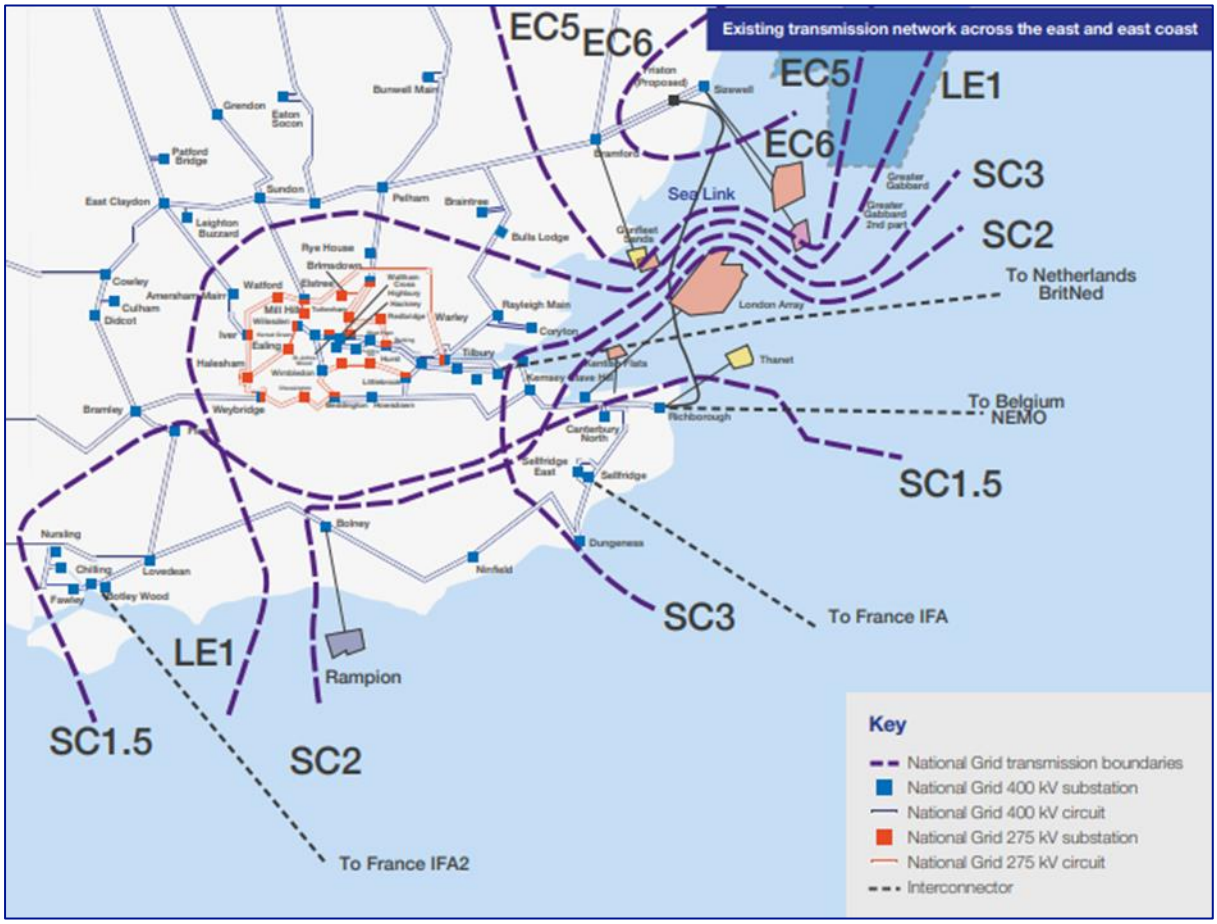
5.2.20 The network is planned and operated under a set of standards designed to ensure there are no widespread electricity supply interruptions. These standards ensure that, for given operational and fault scenarios:

- the electricity system frequency is maintained within statutory limits;
- no part of the network is overloaded beyond its capability; and
- voltage performance stays within acceptable statutory limits, and the system remains electrically stable.

5.2.21 To understand current and future demands on the electricity network, the concept of network boundaries is used. A boundary splits the system into sections and shows where there are high-power flows between parts of the network. When flows across a network boundary are forecast to be above the capability of the network, there is one options to manage this: Pay electricity generators on one side of the boundary to reduce the energy they produce (and in turn pay generators on the other side of the boundary to compensate for the shortfall). This then reduces the flows of electricity across the boundary. When National Grid Electricity System Operator (ESO) pay generators to do this, these are called ‘constraint payments’.

5.2.22 The relevant boundaries are illustrated on Plate 5.1. The existing transmission network infrastructure in the East Anglia and South East areas was not originally designed to accommodate the large volumes of generation capacity that are planned to connect here, and the network will require significant reinforcements in the form of new substations and transmission circuits to provide both connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres, to meet the needs of electricity consumers in Britain.

## Plate 5.1 Relevant Transmission Network Boundaries




## The network for Reinforcement in East Anglia

5.2.23 The national electricity transmission system in East Anglia is encompassed by the East Coast (EC) 5 boundary.

5.2.24 Like much of the high voltage electricity transmission network across the country, the network in East Anglia was largely developed in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich. A large loop runs from Walpole in the north of the region to Pelham and Rayleigh/Tilbury in the south, via Norwich and Bramford.

5.2.25 In addition, two 400 kV overhead lines double circuits form radial circuits that connect Sizewell B to Bramford substation, these circuits cross boundary EC6. The coastline and relatively shallow waters around East Anglia are attractive for the connection of offshore wind projects, including the large East Anglia Round 3 offshore zone that lies directly to the east. The existing nuclear generation site at Sizewell is one of the approved sites selected for new nuclear generation development. New interconnector projects are also contracted to connect within this area.

5.2.26 The growth in offshore wind, nuclear generation, and interconnector capacities connecting behind this boundary greatly increase the power transfer requirements out of the region as local total generation will exceed local demand. The existing high voltage electricity network in East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected while meeting the Security and

Quality of Supply Standard (SQSS). Several network reinforcement projects are planned to address the shortfall of which the Proposed Project is one.

5.2.27 In addition to reinforcing the EC5 boundary, by connecting the Proposed Project into the transmission system at the proposed Friston Substation, it also reinforces the Bramford-Sizewell radial circuits, which are due to carry additional power from offshore wind, new nuclear, and interconnectors. In doing so it offers additional constraint savings to the consumer.

5.2.28 Overall, the construction of the Proposed Project will enable more low carbon electricity generation to be connected to the grid and supply electricity to homes. This will made the network greener, more secure and more reliable. It will also make electricity cheaper for consumers. In doing so, it will also reduce constraint costs paid to generators when the network is unable to transport electricity generated to where it needs to go, which will ultimately make electricity cheaper for consumers.

5.2.29 Overall, the construction of the Proposed Project will enable more low carbon electricity generation to be connected to the grid and supply electricity to homes. In doing so, it will also reduce constraint costs paid to generators when the network is unable to transport electricity generated to where it needs to go. This will made the network greener, more secure and more reliable. It will also make electricity cheaper for consumers.

## The Need in the South East

5.2.30 The south of England transmission region includes boundaries LE1, SC1, SC1.5, SC2 and SC3. The LE1 boundary almost exclusively imports power from the north and west of England into the South East.

5.2.31 Power flows in the region are determined by the need to meet domestic demand in the southeast as well as imports and exports to Europe via interconnectors.

5.2.32 As more energy is pulled across London and into Kent, power flows across LE1 are set to increase. Demand for electricity will grow; interconnectors will exchange more energy with European countries to help balance intermittent sources of power. As a result, the electricity transmission network in the South East will need to be reinforced to ensure it is able to continue operating safely and securely. Further detail can be found in **Application Document 7.2 Strategic Options Back Check Report.**

## Summary

5.2.33 The Proposed Project is regarded by NPS EN-1 as nationally significant low carbon infrastructure which is of CNP. The Proposed Project will provide the urgently needed reinforcement to 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.

## 5.3 Benefits of the Proposed Project

5.3.1 The Proposed Project provides the following benefits which are explained further below.

### Employment Generation

5.3.2 Employment generation as a result of the Proposed Project is assessed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism**. During construction, the Suffolk Onshore Scheme will support an average of 65 total net direct full-time equivalent (FTE) jobs per annum (taking into account leakage, displacement and multiplier effects). Of these, it is estimated that 20 FTE jobs per annum will be taken up by local residents (living within a 60-minute drive time from the Suffolk Onshore Scheme) during the construction period. The Kent Onshore Scheme will support on average a total of 50 total net FTE jobs over the construction period (taking into account leakage, displacement and multiplier effects). Of these, it is estimated that 15 FTE jobs per annum will be taken up by local residents (living within a 60-minute drive time from the Kent Onshore Scheme) during the construction period. Similar employment benefits are also anticipated for the decommissioning phase, in the event this take place.

5.3.3 Construction activities associated with the Proposed Project will provide access to employment in this phase, which will provide a beneficial health impact to these workers. There is evidence that employment matters to health, not only from an economic perspective, but also in terms of quality of life. Good quality work protects against social exclusion through the provision of income, social interaction, identity and purpose which the Proposed Project will help to deliver through its construction phase.

### Economic Benefits

5.3.4 As set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism**, it is estimated that the construction of the Suffolk Onshore Scheme will contribute approximately £4.1 million to the national economy (of which £1.3m would likely be within the local area), while that of the Kent Onshore Scheme will contribute £3.5 million to the national economy (of which £1.1 million would likely be within the local area).

### Landscaping and Ecological Enhancements

5.3.5 **Application Document 7.5.7.1 oLEMP- Suffolk** and **Application Document 7.5.7.2 oLEMP- Kent** set out the details of the landscape mitigation and enhancements that will be provided as part of the Proposed Project.

#### Suffolk Onshore Scheme

5.3.6 The core habitat creation proposals are illustrated on **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation** and **Application Document 7.5.7.1.5 Friston Substation Outline Landscape Mitigation** (for Friston Scenario 2). This will consist of the following:

- New woodland will be planted around Saxmundham Converter Station and the River Fromus, primarily as mitigation to help screen sensitive receptors and soften views,

but also to provide increased structure, ecological connectivity, and interest within the landscape. There will be a long-term net increase in woodland habitat due to the Suffolk Onshore Scheme, estimated to provide a total area of 214,931 $m^2$.

- A section of native hedgerow and tree planting is proposed along the B1119 and the permanent access road (15,866 $m^2$). The new sections of hedgerow will provide both a valuable habitat, forming important wildlife corridors as well as a visual screening function by creating additional vegetation layers within the landscape.
- New species-rich neutral grassland will be implemented around the Saxmundham Converter Station site, focused along service corridors and the HVDC and HVAC cable corridors. Open areas of grassland will also be established within pockets of woodland creating open glades and along the permanent PRoW diversions. Grassland will also be established along the permanent access road and around the attenuation ponds between the riparian planting and woodland areas. A total estimated area of 69,414 $m^2$ of neutral grassland will be created.
- An attenuation pond is proposed to the south of the Saxmundham Converter Station along with an open channel connecting the pond to an outlet pipe to the south. A further two permanent attenuation ponds are proposed adjacent to the permanent access road either side of the River Fromus Bridge. There will be a long-term net increase in wetland habitat due to the Suffolk Onshore Scheme with an estimated total area of 8,543 $m^2$.
- The Proposed Project will deliver enhancement of an approximately 500 m stretch of the riparian corridor along the River Fromus from approximate grid references TR 30665 62754 to TR 31176 62863. This will enhance the value of the River Fromus since this stretch of the river has little riparian emergent vegetation.
- The Suffolk Onshore Scheme proposes c. 6 ha of acid grassland creation and/or enhancement, as identified on **Application Document 7.5.7.1.4 Saxmundham Converter Station Habitat Enhancement Areas**. The objective will be to secure well-structured acid grassland which will in turn provide nesting habitat for skylarks and foraging (and potentially nesting) habitat for woodlarks.
- A 12 ha area of arable land has been included within the Order Limits, south of the construction access and east of the River Fromus, to secure suitable nesting habitat for skylark for forty years (this being the lifetime of the Saxmundham Converter Station). The arable land identified is shown on **Application Document 7.5.7.1.4 Saxmundham Converter Station Enhancement Areas**.
- In order to provide a net increase in resource for nesting hobby, three wicker baskets will be placed in trees at least 200 m from construction works; to provide undisturbed nest locations for hobby before the breeding season commences (the baskets will be retained for five years following construction).
- The relocation of the proposed River Fromus Bridge further north from previously proposed locations means that the veteran tree that contains a barn owl nest box will now be retained. However, the tree will still be relatively close to the construction works for the River Fromus bridge. Therefore, to prevent disturbance, the existing barn owl nest box will be relocated to another tree within the Order Limits further south of the bridge, and two additional nest boxes added to provide a net enhancement.
- Three replacement bat boxes would be installed on trees nearby within the Order Limits.

5.3.7 In the event that Friston Substation is built as part of the Proposed Project (Friston Substation Scenario 2), the following mitigation proposals will be implemented as shown on **Figure 5 Friston Substation Outline Landscape Mitigation**:

- New woodland will be planted to the south of Friston Substation linking Grove Wood and Friston House, with the intention of separating Friston Substation from Friston and Grove Road.
- Hedgerow planting is proposed around the Friston Substation with a focus on strengthening existing hedgerows and supplementing these with new ones along historic field boundaries to provide a layered screening in views.
- Species-rich neutral grassland will be established in areas immediately around the Friston Substation and in small fields not viable for agricultural use.

### Kent Onshore Scheme

5.3.8 The core habitat creation proposals are illustrated on **Application Document 7.5.7.2.1 Minster Converter and Substation Outline Landscape Mitigation** and summarised below:

- New woodland will be planted around Minster Converter Station and Substation, primarily as mitigation to help screen sensitive receptors and soften views, but also to provide increased structure, ecological connectivity, and interest within the landscape. There will be a long-term net increase in woodland habitat due to the Kent Onshore Scheme with a total estimated area of 65,985 $m^2$.
- A short section of native hedgerow (995.1 $m^2$) is proposed along the permanent access track close to the bell mouth with the A256 to replace a section of existing hedgerow which will be removed during construction
- New species-rich neutral grassland will be implemented around the Minster Converter Station and Substation platform, along the proposed access road and around the attenuation ponds and ditches between the riparian planting and woodland areas. Consequently, there will be an estimated long-term net increase in semi-natural grassland habitat due to the Kent Onshore Scheme of 50,260 $m^2$ of neutral grassland.
- Attenuation ponds are proposed around the Minster Converter Station and Substation which, whilst primarily having a drainage attenuation function, will be designed such that they integrate positively within the landscape and provide improved biodiversity and habitat for riparian mammals. These will total approximately 20,925.2 $m^2$ in area.
- In order to maintain an open landscape along the permanent access road, the landscape treatment will be limited to the creation of approximately 1,215 m of swale either side of the permanent access road which will not be surrounded by a fence.
- The Proposed Project will deliver enhancement of an approximately 500 m stretch of the riparian corridor along the River Stour from approximate grid reference TR 30665 62754 to TR 31176 62863. The enhancement area is also shown on **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas.**
- An area of land is proposed to be enhanced for golden plover will also be enhanced for nesting skylark. The mitigation parcel is an area of 10 hectares (ha) of existing arable land near Great Stonor, located approximately 500 m from Thanet Coast &

Sandwich Bay SPA/Ramsar. The mitigation parcel is shown on **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas.**

## Public Rights of Way

5.3.9 The Order Limits in the vicinity of Saxmundham Converter Station is crossed by two PRoW running north-south (PRoW E-491/005/0) and east-west (PRoW E-491/006/0). Whilst PRoW diversions are required, these have been designed and co-ordinated with other projects in this area (e.g. LionLink) to minimise additional journey distances, re-join existing routes and improve route connectivity. The permanent diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to fully consider the long-term future of the site and to avoid the need for subsequent diversions. Corridors of land have also been safeguarded within the Order Limits (by keeping these clear of potential obstructions) so that new PRoW routes can be provided by other projects when these come forward to enhance the network/open access across the countryside, which is an approach welcomed by SCC. Therefore, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public.

# 6. Planning Appraisal of Project Wide Effects

## 6.1 Introduction

6.1.1 This Section presents an appraisal of compliance of the project wide effects with the main policy requirements identified following a review of the documents identified in Section 2 of this Planning Statement.

6.1.2 **Appendix A, NPS Accordance Table** and **Appendix C, Local Policy Accordance Table**, set out an analysis of compliance with the specific policies of the suite of designated National Policy Statements for Energy and local planning policies, respectively. The NPPF also contains policies that can be important and relevant to decision making and has been fully considered in the development and appraisal of the project. However, tn order to avoid excessive repetition in this report, the NPPF is only referenced when it offers additional policy context not covered by the NPS.

6.1.3 The appraisal considers the construction, operation and decommissioning of the Proposed Project.

## 6.2 Principle of Development

### Planning Policy Context

6.2.1 National policy supporting the need for the Proposed Project is set out in Section 5 of this Planning Statement and is not repeated here.

6.2.2 Sections 7 and 8 set out the appraisal of the Onshore Scheme and Offshore Scheme, respectively, against relevant policy.

### Appraisal of the Proposed Project

6.2.3 Key aspects in the consideration of the principle of development for the Proposed Project are its need case and its location case. These are discussed further below.

#### Need for the Proposed Project

6.2.4 Section 5 of this Planning Statement explains that, as a bootstrap directed into the NSIP regime under section 35 of the Planning Act 2008, the Proposed Project will deliver nationally significant low carbon infrastructure for which there is a critical national priority (CNP), as set out in paragraphs 4.2.4 and 4.2.5 of NPS EN-1 (DESNZ, 2024).

6.2.5 Paragraph 4.1.7 of NPS EN-1 states that, "*for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh residual effects in all but the most exceptional cases.*" The assessment of the planning balance for the Proposed Project is set out in Section 9 of this Planning Statement and confirms that substantial weight is to be given to the Proposed Project's need case and this outweighs the Proposed Project's negative residual effects.

### Location of the Proposed Project

6.2.6 The requirement for a reinforcement of the transmission system between East Anglia and the South East is explained in Section 5 of this Planning Statement.

6.2.7 Having established the need to reinforce the transmission system, National Grid evaluated a range of strategic options to address this need. **Application Document 7.2 Strategic Options Back Check Report** sets out the details of the strategic options considered and concludes that Option SL2 HVDC connection between Sizewell area and Richborough area would best balance the overall technical, cost, environmental and socio-economic considerations.

6.2.8 Following the identification of the preferred strategic option, National Grid then undertook a robust site selection process to identify the landfall areas, cable route corridors and converter station sites for the Proposed Project. **Application Document 7.3 Design Development Report** provides a detailed summary of the site selection process through the stages of developing the Proposed Project.

6.2.9 **Application Document 7.3 Design Development Report** draws upon the detail presented in **Application Document 8.1 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** which explains how the selection of routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences which were consulted upon during non-statutory consultation. It also draws upon **Application Document 8.2 Option Selection and Design Evolution Report (October 2023**) which explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. **Application Document 7.3 Design Development Report** explains how the design of the Proposed Project has evolved, including how planning policy, the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the optioneering and design evolution process, demonstrating how such policy and legislative objectives have been embedded into the design of the Proposed Project. Alternatives have been revisited where appropriate through the design of the Proposed Project to check they remain valid in the context of further environmental information, consultation responses, land considerations and design.

6.2.10 As part of the design development, alternative locations for the Proposed Project were considered. These are explained in the ES in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered.** The site selection process is also discussed in further detail below.

### Conclusion

6.2.11 It is considered that the principle of development for the Proposed Project has been established through its need case and through the identification of the preferred location for the Proposed Project following a robust site selection process.

## 6.3 Good Design and Site Selection

6.3.1 This section sets out how the Proposed Project complies with policy relating to good design.

## Legislation

6.3.2 National Grid has duties placed upon it by the Electricity Act 1989 and operates under the terms of its transmission licence. Where National Grid is developing new infrastructure, it is required to have regard to the following statutory duties under the Electricity Act 1989:

- Section 9(2) General duties of licence holders
- Section 38 and Schedule 9 Preservation of amenity and fisheries.

### Section 9(2) of the Electricity Act 1989

6.3.3 National Grid is regulated by Ofgem, the electricity and gas markets regulator, to ensure value for money for consumers, and is required under Section 9(2) of the Electricity Act 1989 "*to develop and maintain an efficient, co-ordinated and economical system of electricity transmission*".

6.3.4 These obligations mean that National Grid is responsible for the delivery of new electricity transmission infrastructure and for the cost of projects, as costs will ultimately be borne by electricity users.

### Section 38 and Schedule 9 of the Electricity Act 1989

6.3.5 Section 38 and Schedule 9 of the Electricity Act 1989 require National Grid, when formulating proposals for new lines and other works, to "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest"* and to "*do what it reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*".

## Planning Policy Context

### National Planning Policy

6.3.6 Section 4.7 of NPS EN-1 (DESNZ, 2024) sets out the principles for good design that are applicable to all energy infrastructure and highlights the importance and the benefits of achieving good design, particularly for the mitigation of adverse impacts of a project.

6.3.7 Paragraph 4.7.5 of NPS EN-1 encourages the use of design principles and the appointment of a design champion to guide the design development from conception to operation.

6.3.8 Paragraph 4.7.6 of NPS EN-1 acknowledges that whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting.

6.3.9 Paragraph 4.7.7 of NPS EN-1 expects applicants to provide details in their application of how the design process was conducted and how the design has evolved, while paragraph 4.7.8 advises them to take independent professional advice on the design aspects of a proposal.

6.3.10 For decision-making, paragraphs 4.7.10 and 4.7.11 of NPS EN-1 require the SoS to be satisfied that the proposed development is "*sustainable"* and *"as attractive, durable, and adaptable (…) as they can be"*, having taken into account functionality (including fitness

for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located), any potential amenity benefits, and visual impacts on the landscape or seascape as far as possible. Paragraph 4.7.12 adds that *"the SoS should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements that the design has to satisfy"*. Paragraph 2.5.1 of NPS EN-3 (DESNZ, 2024) refers applicants to the criteria for good design set out in NPS EN-1 (and summarised in the above paragraphs). In addition, Section 2.8 of NPS EN-3 on offshore wind provides specific guidance that can also be relevant to cabling and offshore transmission for all types of electricity network infrastructure (as indicated in its paragraph 2.8.5), including:

- The need to work collaboratively with other developers and sea users on co-existence/co-location opportunities (paragraph 2.8.48).
- The expectation for applicants "*to define the precise route for offshore transmission infrastructure, including … the location of bootstraps/subsea 'onshore transmission*" (paragraph 2.8.67), or "*where the applicant does not know the precise location of the offshore transmission cables and any associated infrastructure, a corridor should be identified within which the specific infrastructure is proposed to be located*" (paragraph 2.8.69).
- The requirement for applicants to "i*nclude details on how avoidance has been achieved, good design principles have been followed and provide proposals for mitigation*" (paragraph 2.8.73).

6.3.11 Section 2.2 of NPS EN-5 (DESNZ, 2024) considers factors influencing site selection and design for electricity networks infrastructure. Paragraph 2.2.8 states: "*There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design*" Paragraph 2.2.9 goes on to state that the applicant should *"consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts".* Finally, paragraphs 2.2.10-2.2.12 set out the duties of applicants under Section 9 and Schedule 9 of the Electricity Act 1989 (*"to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest (…)")*.

6.3.12 Section 2.4 of NPS EN-5 refers applicants to the criteria for good design set out in Section 4.7 of NPS EN-1. However, paragraph 2.4.3 requires the SoS to be mindful that electricity networks infrastructure must in the first instance be safe and secure, and that applicant's ability to influence the aesthetic appearance of infrastructure may be limited by the functional design constraints of safety and security. The Holford Rules (guidelines for the routing of new overhead lines) are introduced in paragraphs 2.9.16 and 2.9.17 of NPS EN-5, while the Horlock Rules (guidelines for the design and siting of substations) are summarised in paragraphs 2.9.18 and 2.9.19.

6.3.13 Paragraph 2.11.2 of NPS EN-5 states *"The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them."*

6.3.14 NPS EN-5 specifically covers undergrounding and subsea cables in paragraphs 2.9.20-2.9.25. Notably, paragraph 2.9.20 states:

*"Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption*

*is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).”*

6.3.15 Paragraph 2.9.22 adds: *“However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.”*

6.3.16 Sections 2.12 and 2.15 of NPS EN-5 address offshore-onshore transmission, including subsea onshore transmission or bootstraps reinforcing the onshore transmission network. In particular, paragraphs 2.13.21 to 2.13.23 highlight the need to consider the sensitivities of coastal locations and of the marine environment when considering onshore connection points. Paragraph 2.14.2 indicates what applicants should demonstrate in the assessment of their designs. This includes how environmental; community and other impacts have been considered and how the mitigation hierarchy has been applied.

6.3.17 Paragraph 2.15.1 states, in relation to the Secretary of State decision-making: “*Coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community, and other impacts, as set out above, must be considered. The Secretary of State must be satisfied that applicants have explained the steps they have taken to do this, the options that have been considered and the approach they have taken to coordination as set out in above at section 2.13*”.

6.3.18 Section 12 of the NPPF is entitled ‘Achieving well designed places’ and provides policy and guidance for the “*creation of high quality beautiful and sustainable buildings”*. The NPPG also provides guidance on key points to take into account on design. Given that these policies and guidance emphasise the need for design quality throughout the evolution and assessment of individual proposals, similarly to those set out in NPS EN-1 above, they are not repeated here.

### Local Planning Policy

6.3.19 SCLP Policy SCLP11.1(Design Quality) supports development which is locally distinctive and of a high quality design that “*clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means*”. This policy sets out design requirements. Of relevance, these include responding to local context; taking account of any important landscape or topographical features; retention and/or enhancement of existing landscaping and natural and semi-natural features on site; the need to protect the amenity of the wider environment, neighbouring uses; and integration of development into its surroundings through the use of hard and soft landscaping schemes.

6.3.20 TLP Policy SP35 (Quality Development) (Thanet District Council, 2020) seeks to ensure that new developments in Thanet are designed to be sustainable, safe, and enhance the local character and quality of life

6.3.21 DDLP Policy PM1 (Achieving High Quality Design, Place Making and the provision of Design Codes) requires all development in the District “*to achieve a high quality design that promotes sustainability and fosters a positive sense of place”.*

### Marine Plans

6.3.22 Policy CAB1 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) states that "*Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant*". Similarly, Policy SE-CAB-1 of the South East Inshore Marine Plan (DEFRA, 2021) states:

"*Preference should be given to proposals for cable installation where the method of protection is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. Where burial or protection measures are not appropriate, proposals should state the case for proceeding without those measures*."

### Relevant Guidance

6.3.23 The Planning Inspectorate's NSIP Advice Page on Good Design (The Planning Inspectorate, 2024) emphasises the importance of good design for achieving sustainable, inclusive, and well-designed infrastructure projects. It encourages applicants to follow the advice provided on design considerations, ensuring a holistic approach throughout the project's development. Key factors include addressing design challenges, engaging with communities, maintaining a strong design vision, and ensuring the design evolves through professional review and consultation. The advice also stresses the importance of securing design quality beyond the site and throughout the delivery process. Annex A of the document provides a list of good design issues for applicants to consider.

6.3.24 The Planning Inspectorates NSIP Advice Page on Preparing Applications for Linear Projects (The Planning Inspectorate, 2025) provides advice on electric lines, gas pipelines, water resource transfers, and onshore transmission works for offshore wind stations. The advice encourages early engagement with PINS and other parties during the pre-application process on optioneering. The note directs applicants to the Advice Page on Good Design and highlights that for "*linear projects it is important that the narrative covers the construction stage as well as operation because of the potential to affect various communities and habitats along the route"*. It also goes onto to advice that flexibility for linear projects can be required.

## Appraisal of the Proposed Project

### Overview

6.3.25 The location and design of the Proposed Project is the result of a comprehensive site selection and good design process that was led by the consideration of key environmental and planning constraints to avoid and minimise impacts as early as possible. This site selection and design process is documented in detail in the following reports:

- **Application Document 7.2 Strategic Options Back Check Report:** this report sets out why the Proposed Project is needed and what strategic options were considered to meet the identified need case.
- **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022):** this report explains how the routeing and siting of the Proposed Project was undertaken (following the selection of the strategic option)

and the reasons for the selection of the emerging preferences which were consulted upon during non-statutory consultation.

- **Application Document 8.2 Option Selection and Design Evolution Report (October 2023):** this report explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation.
- **Application Document 7.3 Design Development Report**: this report summarises the key design decisions from the two historical reports above and sets out how the design of the Proposed Project evolved from statutory consultation to the Proposed Project as applied for, taking into account feedback received from stakeholders.
- **Application Document 6.2.1.3Part 1 Introduction Chapter 3 Main Alternatives Considered**: this ES chapter provides an overview of the main alternatives considered at each stage of the design development (from strategic options to the proposal as applied for).

6.3.26 The above documents provide details of how the design process was conducted and how the design has evolved. They demonstrate how the Proposed Project has undergone an iterative design process led by the early consideration of environmental and planning constraints to avoid and minimise impacts.

### Design Evolution

6.3.27 Once the need for the Proposed Project had been established (see section 5 of this Planning Statement), National Grid considered the different ways in which this need could be met, to generate a preferred strategic proposal. Four alternatives were considered at this stage, comprising different technologies and geographical connection point. For each alternative, the technology options available for transmission system reinforcement, environmental and socio-economic constraints, lifetime costs of each technology option, as well as initial capital costs, were considered. The strategic proposals considered and the reasons for the selection of the preferred strategic option are set out in **Application Document 7.2 Strategic Options Backcheck Report**.

6.3.28 Following the selection of the strategic option, a staged approach was adopted to identify and appraise corridors and preliminary routeing and siting options for the Proposed Project, taking into account the potential effects on the environment, the local community, relevant spatial planning policy and planning applications, other existing and proposed developments as well as technical and engineering design considerations. This approach was used to identify 'on-balance' preferences for landfalls, converter station and substation sites and potential route corridors within which preliminary alignment could be developed. These options were put forward for Non-Statutory Consultation (October – December 2022). The option selection process, the options considered and the appraisal outcomes are described in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)**

6.3.29 The Proposed Project was then developed taking into account of feedback received at Non-Statutory Consultation, stakeholder engagement and environment, socio-economic and technical studies. The defined proposal was put forward to Statutory Consultation (October – December 2023).

6.3.30 Since the close of the Statutory Consultation in December 2023, and in response to feedback received and further technical and environmental assessments, some

amendments were made to the defined proposal, which did not substantially alter the Proposed Project, but which were nevertheless consulted on as part of a Targeted Consultation undertaken in July 2024.

6.3.31 The Proposed Project has been further refined in response to feedback received from the Targeted Consultation, ongoing stakeholder engagement, the results of initial environmental and socio-economic appraisals undertaken as part of the EIA process, and ongoing technical design. Following the feedback received at Targeted Consultation, as well as further technical and environmental assessment work, a number of changes were introduced to the Proposed Project. Localised engagement therefore took place between November 2024 and January 2025 targeted at those who were likely to be affected by the changes to the proposals; however, the amendments to the Proposed Project were not material or substantial changes to the proposals.

6.3.32 For further details on the design evolution are available in **Application Document 7.3 Design Development Report.** This report explains how the design process was conducted and how the design has evolved, in line with paragraph 4.7.7 of NPS EN-1.

### Policy Influences on Design

6.3.33 Each option identified for the landfalls, converter station site areas, and cable route corridors was appraised in accordance with National Grid's approach to options appraisal (National Grid, 2012). The options appraisal process includes cost (capital and lifetime) as an appraisal topic and is underpinned by principles that are aligned with National Grid's statutory duties under Sections 9 and 38 of the Electricity Act 1989, such as:

- Financially less-expensive options, both in terms of capital and lifetime costs, will generally be of benefit/advantage, as these support National Grid's statutory duty under Section 9(2) of the Electricity Act 1989 to develop and maintain *"an efficient, co-ordinated and economical system of electricity transmission"*.
- Options that avoid or reduce and mitigate impacts on environmental or socio-economic constraints will generally be of benefit/advantage compared with those which have likely significant residual effects, as less environmentally or socially-damaging options, support National Grid's statutory duty under Schedule 9 of the Electricity Act *"to have regard to the desirability of preserving amenity"*.

6.3.34 The options appraisal process has also considered planning policy and guidance when making judgements and decisions about the Proposed Project. The topics and associated criteria considered in the appraisal of all onshore options, from Mean High Water Springs (MHSW) to the final network connection point, are outlined in Section 8 of **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** and included:

- Landscape and Visual: potential to affect the special qualities and landscape character of Areas of Outstanding Natural Beauty (AONB) and Heritage Coast, proximity to sensitive visual receptors (residential/settlement);
- Historic Environment: proximity to World Heritage Sites, Conservation Areas, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Registered Battlefields and military remains;
- Biological Environment: proximity to designated sites of European/international/national/local value, proximity to ancient woodland;

- Physical Environment: proximity to flood zone 2 and 3 and to main rivers;
- Settlement and Population: proximity to main settlements and to allocations and growth areas;
- Tourism and Recreation: number of Public Rights of Way (PRoW)/National Trails/National Cycle Routes crossings/diversions and proximity to tourist attractions;
- Planning: current planning applications, conformance with NPS EN-1, NPS EN-3, and NPS EN-5, National Planning Policy Framework (NPPF) and local development plan spatial policies.

6.3.35 The constraints taken into consideration in the appraisal of the marine alignment options are also described in Section 7 of **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** and included:

- Biological Environment: potential interactions with ecological designations such as Special Areas of Conservation (SAC), Special Protection Areas (SPA), Marine Conservation Zones (MCZ);
- Physical Environment: bathymetry, solid geology and seabed sediments;
- Socio-economics: including cables and renewable energy infrastructure, shipping routes and restricted areas;
- Marine planning: East Inshore Marine Plan and South East Inshore Marine Plan.

6.3.36 The appraisal methodology followed for the appraisal of each element of the Proposed Project are provided in Chapter 6 of **8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022).** Through the options appraisal process, the consideration of the impacts of the various onshore options and marine alignments on the physical, socio-economic, ecological and landscape and visual context has therefore informed the design process

6.3.37 In addition to National Grid's statutory obligations and all other relevant planning policies and guidance, the identification of appropriate sites for the converter stations have been informed by the Horlock Rules (National Grid, 2009). Although these rules were developed for the siting of substations, they are also considered appropriate for converter station sites. The rules facilitate the consideration of environmental and amenity matters within the design and siting of new substation/converter station infrastructure.

6.3.38 National Grid has also used the Holford Rules (National Grid, 1959) to inform the design and routeing of the proposed overhead line in the Kent Onshore Scheme. A detailed overview of how the Horlock Rules and the Holford Rules were applied in the routeing and siting of the Proposed Project is available in Section 7 of **Application Document 7.2 Design Development Report.**

6.3.39 National Grid has also considered recent advice from The Planning Inspectorate on linear projects (The Planning Inspectorate, 2025). This guidance recommends "*a clearly structured approach, setting out criteria for selection and how the preferred route was determined".* The reports listed in the overview paragraph of this Section of the Planning Statement demonstrate that such a structured approach, following a methodology based on clearly-defined criteria, has been adopted in the routeing and optioneering process. A summary of this process is provided in **Application Document Design Development Report** and an overview of the corridors and alignments considered is also available in **Application Document 6.2.1.3 Part 1 Introduction**

**Chapter 3 Main Alternatives Considered,** in line with the PINS advice on linear projects.

6.3.40 **Application Document 7.3 Design Development Report** also explains where design choices have sought to reduce the environmental effects of the Proposed Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.

6.3.41 **I**n line with the principles of NPS EN-5 (DESNZ, 2024) in relation to undergrounding, National Grid has considered the benefits of undergrounding cables, together with the additional cost and environmental implications of this design approach, in the optioneering process – as documented in **Application Document 7.2 Strategic Options Backcheck Report** and **8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)**. Four strategic options (SL1, SL2, SL3 and LL1) were considered to address the Sea Link need, one of which (LL1 – Sizewell area to Canterbury) was a new land-based transmission connection between a new substation in the vicinity of Sizewell and a new substation in the vicinity of Canterbury (the other three options involved a subsea cable). The option of delivering the LL1 connection via an alternating current (AC) overhead line (OHL) is assessed in **Application Document 7.2 Strategic Options Backcheck Report**. Much of the study area for this option comprises constraints to an AC OHL and it is considered unlikely that all of the impacts could easily mitigated; the LL1 option would also require a cable tunnel to cross the Thames Estuary, adding significantly to capital costs. Following the assessment of strategic options, option LL1 was discounted and option SL2 (HVDC connection between Sizewell Area and Richborough area) was taken forward. In summary, strategic option SL2 has one of the lowest overall cost, and offers environmental and socio-economic benefits over the other options (SL1, SL3 and LL3).

6.3.42 For the Suffolk Onshore Scheme, an HVAC connection by underground cable from the Friston Substation to the converter station site was preferred to an OHL HVAC connection due to the proximity of the Suffolk and Essex Coast and Heaths National Landscape. The Kent Onshore Scheme comprises an HVAC connection from the existing Richborough to Canterbury 400 kV OHL to the proposed Minster Substation via a new overhead line approximately 3.5 km long (of which 2.2 km would be replacement of existing Richborough to Canterbury connection). The choice of an OHL for the HVAC connection in Kent, as opposed to an underground cable, is explained in **Application Document 7.3 Design Development Report**. Although the OHL option has a greater potential for permanent impacts on landscape character, the setting of historical assets and bird collision risk; the underground option would require a permanent compound within Flood Zones 2 and 3, would have more potential for physical impacts on non-designated heritage assets and would lead to more permanent habitat loss. This accords with paragraph 2.9.20 of NPS EN-5 that *"overhead lines should be the strong starting presumption for electricity networks developments in general"* in areas that are not nationally designated for their landscape value (National Parks, National Landscapes or The Broads). It is also made clear in paragraph 2.9.7 that the development of new OHLs is not incompatible with applicants' statutory duties under Schedule 9 of the Electricity Act.

6.3.43 The potential for greater landscape and visual impacts and bird collision risks from the OHL was recognised and the design development has sought to minimise these

impacts as far as practicable. For example, bird diverters (visible in low light conditions) will be installed on the new section of OHL and new steel lattice pylons (standard height of 46.5 m or lower height of 41.4 m) have been chosen as the preferred option to support the conductors (rather than T-pylons). Lattice pylons offer the advantage of thin steel members in in an open structure, making background features visible beyond, helping them to visually recede. Further technical characteristics of the proposed HVAC connection for the Kent Onshore Scheme are discussed in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**

6.3.44 The evolution of the Offshore Scheme is summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, covering the identification of indicative marine alignments at the start of the routing and siting process and the subsequent evolution of the Offshore scheme at various key stages.

6.3.45 In line with Policy CAB1 of the East Inshore and East Offshore Marine Plans and Policy SE-CAB-1 of the South East Inshore Marine Plan, the Offshore Scheme comprises a HVDC cable for most of its length, although there is some potential for areas of surface lay requiring rock protection, particularly if existing cable or pipelines need to be crossed.

### Coordination in design development

6.3.46 The design of the Proposed Project has responded to policy expectations set out in NPS EN-1 (DESNZ, 2024), NPS EN-3 (DESNZ, 2024) and NPS EN-5 (DESNZ, 2024) requiring the consideration and evaluation of coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts to the local environment and host communities. This requirement to consider coordination with other projects was also reflected in feedback received from stakeholder consultations. At the time of the option identification and selection process (in 2022), the proposed Friston Substation was sufficiently advanced in the consenting process for National Grid to determine that there was a realistic opportunity to coordinate with SPR EA1N and EA2 projects, rather than to pursue a separate substation. The Friston Substation was therefore selected in favour of a new substation for the connection point, as a connection to a new substation would provide no environmental, socio-economic or technical benefit over a connection to the proposed Friston Substation.

6.3.47 Following the selection of the Converter Station Site at Saxmundham for the Suffolk Onshore Scheme, National Grid undertook a design process which has resulted in the Sea Link Converter Station being part of a wider master-planned site, with the capacity to accommodate up to three converter stations. The masterplan (See Appendix A of **Application Document 7.10 Coordination Document**) demonstrates how up to three converter stations could be developed, taking account of the likely phasing of works and the location of construction compounds, and the strategy for mitigation planting, access roads and retention of PRoW that exist within and surrounding the site, and drainage. This masterplan was developed in consultation with LionLink and Nautilus, and the host LPAs in Suffolk.

6.3.48 The Proposed Project has also considered the potential for colocation when selecting the landfall at Aldeburgh and has designed this, and the onward HVDC cable corridor, in a way that leaves sufficient space for up to two other projects to be constructed to the north, broadly along the same corridor and using the same landfall.

6.3.49 In Kent, opportunities to co-locate with other proposed projects surrounding the Richborough Substation for the HVAC connection were considered; however, colocation was not considered possible.

6.3.50 The details of how the Proposed Project has explored opportunities for coordination are set out in **Application Document 7.10 Coordination Document.**

### Design Principles, Review and Solution

6.3.51 As required by paragraph 4.7.5 of NPS EN-1 (DESNZ, 2024), design principles for the Proposed Project have been developed and are set out in:

- **Application Document 7.12.1 Design Principles – Suffolk**
- **Application Document 7.12.2 Design Principles – Kent.**

6.3.52 The design principles have been developed through ongoing engagement with the host LPAs. The design principles include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things. This is in line with paragraph 4.7.12 of NPS EN-1 (DESNZ, 2024) which acknowledges that the design of infrastructure is likely to be limited by the ultimate purpose of the infrastructure and its operational, safety and security requirements. NPS EN-5 paragraph 2.4.3 also acknowledges this, requiring the SoS to be mindful that electricity networks infrastructure must in the first instance be safe and secure and that aesthetic appearance of infrastructure may be limited by the functional design constraints of safety and security.

6.3.53 The site-specific design principles for the converter station sites in Suffolk and Kent provide guiding principles for the detailed design for these elements of the Proposed Project. As specified in Requirement 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for confirmation that they are in general accordance with the site-specific design principles.

6.3.54 As recommended in NPS EN-1, independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide oversight of the ongoing design process and delivery of the Proposed Project. The key responsibilities of the design champion are set out in **Application Document 7.11.1 Design Principles – Suffolk** and **Application Document 7.11.2 Design Principles – Kent.**

6.3.55 An explanation of how the design of the converter station sites responds to their wider context is presented in:

- **Application Document 7.11.1 Design Approach Document – Suffolk**
- **Application Document 7.11.2 Design Approach Document – Kent.**

6.3.56 These Design Approach Documents (DADs) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approaches have evolved in response to ongoing design development, feedback

from statutory consultation, engagement with LPAs and the DRP. National Grid is seeking flexibility in the design of the Proposed Project as outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 Approach and Methodology.** This is to enable a detailed design process to follow if the DCO is granted, to make sure that the most suitable position for the converter stations can be delivered and unexpected issues in the routeing and siting of infrastructure can be accommodated. The EIA has therefore been undertaken on the basis of the principles of the Rochdale Envelope, assessing the maximum (and where relevant, minimum) parameters for the Proposed Project, where flexibility needs to be retained and presenting a worst case assessment in the ES.

6.3.57 In summary, the Proposed Project delivers good design, in accordance with the design policies set out in the NPSs that acknowledge that the context of any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. Through the design process presented in the suite of design documents submitted with the Application the Proposed Project will deliver high quality design which has responded to the local and surrounding context in accordance with relevant local planning policies.

## 6.4 Climate Change

### Planning Policy Context

#### National Planning Policy

6.4.1 NPS EN-1 paragraph 4.10.8 (DESNZ, 2024) states that "*New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure*."

6.4.2 Paragraphs 4.10.9 to 4.10.13 of NPS EN-1 require consideration of the impacts of climate change on development to be presented in the ES and state that a range of climate change scenarios should be assessed including using the latest UK Climate Projections and associated research and expert guidance available at the time of assessment. In particular, paragraph 4.10.11 expects applicants to demonstrate a "*high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario*".

6.4.3 Paragraph 4.10.15 of NPS EN-1 sets out that the "*Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections*."

6.4.4 Referring to Section 4.10 of NPS EN-1, paragraphs 2.3.1 to 2.3.3 of NPS EN-5 (DESNZ, 2024) advise that, with regard to electricity infrastructure, the resilience of a

project to climate change should be assessed in the ES, and applicants should set out how the project would be resilient to flooding, with particular reference to substations.

6.4.5 NPS EN-1 paragraph 5.3.4 (DESNZ, 2024) requires all proposals for energy infrastructure to include a GHG assessment. Paragraph 5.3.8 states that "*The Secretary of State must be satisfied that the applicant has as far as possible assessed the Green House Gas (GHG) emissions of all stages of the development*", while paragraph 5.3.9 indicates that the *"Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development".*

6.4.6 NPS EN-1 Paragraph 5.3.10 states "*the Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure"*.

6.4.7 NPS EN-1 paragraph 5.3.11 acknowledges that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Paragraph 5.3.12 makes it clear that the *"Secretary of State does not therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments".*

6.4.8 NPS EN-1 paragraph 5.3.7 expects a GHG Reduction Strategy to be prepared and secured under the DCO. The GHG Reduction Strategy should set out measures taken to minimise and offset emissions and also the consideration of the creation and preservation of carbon stores and sinks such as woodland creation, hedgerow creation and restoration and peatland restoration.

6.4.9 Section 14 of the NPPF is entitled 'Meeting the challenge of climate change, flooding and coastal change' and makes it clear, in its paragraph 163, that *"the need to mitigate and adapt for climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts"*. The NPPG also provides guidance on how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change. Given that the thrust of policies and guidance contained in the NPPF and NPPG align with those set out in the NPSs above, they are not repeated here.

### Marine Plans

6.4.10 Policy CC1 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) states:

*"Proposals should take account of:*

- *how they may be impacted upon by, and respond to, climate change over their lifetime how they may impact upon any climate change adaptation measures elsewhere during their lifetime and*
- *Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts*."

6.4.11 Policy SE-CC-2 of the South East Inshore Marine Plan (DEFRA, 2021) stipulates *"Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change."*

### Local Planning Policy

6.4.12 Section 9 of the SCLP (East Suffolk Council, 2020) is dedicated to climate change and sets out policies related to this topic, including:

- Policy SCLP9.1 Low Carbon And Renewable Energy, supporting low carbon and renewable energy developments
- Policy SCLP9.3 Coastal Change Management Area, setting out criteria for development within the Coastal Change Management Area
- Policy SCLP9.5 Flood Risk, outlining that proposals for development should be safe, resilient and not increase flood risk elsewhere.

6.4.13 Section 5 of the DDLP (Dover District Council, 2024) and Section 15 of the TLP (Thanet District Council, 2020) address issues related to climate change through similar policies. In addition, Policy SP37 of the TLP (Thanet District Council, 2020) explains new development must take account of the need to respond to climate change including minimising vulnerability and providing resilience and reducing emissions and energy demands.

## Assessment Conclusions

6.4.14 **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** presents the assessment of the likely significant effects of the Proposed Project on the climate and the climate change effects that are likely to affect the Proposed Project and surrounding environment. The assessment includes a climate change resilience assessment (CCRA) and a lifecycle Greenhouse Gas (GHG) impact assessment.

### Climate Change Resilience

6.4.15 **Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** sets out the potential climate hazards and potential impacts on the development at Table 1.21: Climate Change Risk Assessment. The future UK Climate Projections 2018 (UKCP18) have been used in the CCRA to provide probabilistic indications of how global climate change is likely to affect areas of the UK using pre-defined climate variables and time periods. The CCRA concludes that with mitigation measures in place including designing the Proposed Project to be resilient to any significant effects of climate change and sensitive routing and siting of permanent and temporary works, the likely effects of climate change on the Proposed Project during construction and operation are not significant.

### Greenhouse Gas Emissions

6.4.16 **Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** concludes that construction, operation and maintenance of the Proposed Project will result in GHG emissions, with the total GHG emissions associated with the Proposed Project in the 5 year construction phase predicted to be 245,850 $tCO_2e$ and in the 40 year operational phase predicted to be 20,827 $tCO_2e$. There will be embodied carbon in the materials used for the construction of the Proposed Project while fuel use

during construction will result in GHG emissions. A detailed breakdown of GHG emissions is provided in **Application Document 7.5.13 Greenhouse Gas Reduction Strategy** along with a framework for identifying and prioritising opportunities for GHG reduction.

6.4.17 The majority of construction phase GHG emissions are attributed to embodied emissions in raw materials for buildings and electrical equipment at the converter stations and substations. Other emission sources include emissions from material transport, construction activities, worker transport, waste, and pre-construction demolition. This accounts to 0.005% of the 4th Carbon Budget Period (2023-2027) and 0.009% of the 5th Cabron Budget Period (2028-2032).

6.4.18 The majority of operational phase GHG emissions are attributed to transmission losses. Other emission sources include emissions from maintenance and lighting. This accounts to 0.0001% of the UK's 5th Carbon Budget Period (2028-2032) and 0.0003% of the 6th Carbon Budget Period (2033-2037).

6.4.19 In total, the potential GHG emissions of the Proposed Project are estimated to contribute less than 0.01% of any respective UK carbon budget. Although the Proposed Project will result in increased GHG emissions, when considering the significance of the impact of the Proposed Project on the climate, consideration needs to be given on its role in wider UK policy to decarbonise the electricity grid. Over its lifetime the Proposed Project will be a key scheme for the UK to fulfil its net zero policy and transition away from fossil fuels. By reinforcing the electricity transmission network, the Proposed Project will facilitate the connection of new renewable and low carbon energy generation and interconnectors. Therefore, the effect of GHG emissions associated with the Proposed Project during construction and operation is deemed to be not significant.

6.4.20 If the Proposed Project is required to be decommissioned, activities associated with the decommissioning phase will likely result in GHG emissions, including on-site equipment, transport, and waste disposal. Due to the unpredictability of the decommissioning phase, these emissions have not been quantified. Nonetheless, in contrast to the construction emissions, there will be no materials required during the decommissioning phase, which typically account for the majority of construction phase emissions. Emission factors for the disposal of wastes are typically significantly lower than the emission factors to produce the same materials (the embodied carbon).

6.4.21 Decommissioning activities are also envisaged to take place over a much shorter period compared to the construction phase. Decommissioning activities are therefore expected to be significantly less than those calculated for the construction phase given the rationale above. Overall, the assessments conclude that impacts are therefore not likely to be significant in terms of the UK's national GHG inventory or the ability of the UK to meet its carbon budgets. **Application Document 7.5.13 Greenhouse Gas Reduction Strategy** has also been prepared to demonstrate how the GHG emissions associated with the Proposed Project should be managed and reduced.

## Appraisal of the Proposed Project

6.4.22 In line with the requirements set out in paragraphs 4.10.9 to 4.10.12 of NPS EN-1 (DESNZ, 2024) and paragraph 2.3.1 to 2.3.3 of NPS EN-5 (DESNZ, 2024), Policy CC1 of the East Inshore and East Offshore Marine Plans, Policy SE-CC-2 of the South East Inshore Marine Plan, Policy SCLP9.1, SCLP9.3 and SCLP9.5 of the SCLP and Policy SP37 of the TLP, National Grid has considered the impacts of climate change on the Proposed Project during the construction and operation and maintenance phases. The

Climate Change Resilience Assessment presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** uses historical data obtained from the Met Office and the most recent climate change projections for the UK (UK Climate Projections 2018, Met Office) to assess the likelihood, magnitude and significance of a range of climate change risks, including increased winter precipitation (leading to flooding of site access routes during construction or flooding of onshore facilities during operation) and long-term sea level rise during operation (creating increased occurrences of coastal flooding, sea inundation and coastal erosion at onshore facilities near the coast).

6.4.23 As required by paragraph 5.3.4 of NPS EN-1, a GHG assessment has been included in the ES. This assessment covers the construction, operational and decommissioning GHG impacts, including lifecycle GHG sequestrations due to land use. The Proposed Project's design has incorporated measures to reduce GHG emissions and provide resilience to climate change, where possible. Other control and management measures are also proposed. These measures are outlined in Section 4.8 of **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** and are summarised below:

- The flood mitigation measures detailed 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**.
- Commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC**.
- The use of materials with a low embodied carbon and employing low-carbon construction techniques.
- Sensitive routeing and siting of permanent infrastructure and temporary works.
- Designing the Proposed Project to be resilient to any significant effects of climate change.

6.4.24 **Application Document 7.5.13 Greenhouse Gas Reduction Strategy** has also been prepared to demonstrate how the GHG emissions associated with the Proposed Project should be managed and reduced, as per NPS EN-1 paragraph 5.3.7 and 5.3.9. The GHG Reduction Strategy is secured through Requirement 5 of **Application Document 3.1 Draft DCO**.

6.4.25 Subject to the abovementioned mitigation measures for climate change resilience being successfully implemented into the design, the Proposed Project is therefore in accordance with paragraphs 4.10.13 and 4.10.15 of NPS EN-1, which state that the SoS should be satisfied that applicants have taken into account the potential impacts of climate change using the latest UK Climate Projections and that no features of the design of the development critical to its operation will be seriously affected by climate change.

6.4.26 The Lifecycle GHG Assessment presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** concludes that the Proposed Project will result in increased GHG emissions during construction and operation. However, the Proposed Project is part of UK policy to decarbonise the electricity grid and transition to net zero by 2050. The effect of GHG emissions associated with the Proposed Project is deemed to be not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable policy requirements and good practice design standards for projects of this type. As acknowledged in paragraph 5.3.11 of NPS EN-1, "*operational*

*GHG emissions are not reasons to prohibit the consenting of energy projects"* and paragraph 5.3.10 of NPS EN-1 requires the SoS to accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure. As the Proposed Project has effects which are not significant it is therefore in accordance with measures necessary to achieve the UK's trajectory towards net zero.

6.4.27 Based on the above, it is considered that the Proposed Project is compliant with national, local and marine planning policies relevant to climate change and GHG emissions.

# 7. Planning Appraisal of the Suffolk and Kent Onshore Schemes

## 7.1 Introduction

7.1.1 This Section presents an appraisal of the compliance of the Suffolk and Kent Onshore Schemes with the main policy requirements identified following a review of the documents identified in Section 2 of this Planning Statement.

7.1.2 **Appendix A, NPS Accordance Table** and **Appendix C, Local Policy Accordance Table**, set out an analysis of compliance with the specific policies of the suite of designated National Policy Statements for Energy and local planning policies, respectively. The NPPF, Marine Plan Policy and Local Policy is only referenced when it offers additional or different policy context not covered by the NPS.

7.1.3 The appraisal considers the construction, operation and maintenance, and decommissioning of the Proposed Project.

## 7.2 Landscape and Visual

### Planning Policy Context

#### National Planning Policy

7.2.1 Section 5.10 of NPS EN-1 (DESNZ, 2024) sets out the landscape and visual considerations for energy NSIPs. National Landscape impacts, specifically, are appraised in Section 9.3 of this Planning Statement.

7.2.2 Paragraph 5.10.5 recognises that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape, but there may also be beneficial landscape character impacts arising from mitigation".* Paragraph 5.10.6 explains how projects need to be designed carefully, with regard given to the potential impact on the landscape in terms of siting, operational and other relevant constraints. It states: "*the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate*".

7.2.3 Paragraph 5.10.12 of NPS EN-1 refers to local landscapes that may be highly valued and states that where a local development document has policies based on landscape character assessment, these should be paid particular attention. However, it is confirmed that "*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*".

7.2.4 With regard to visual effects, NPS EN-1 paragraph 5.10.13 is clear that "*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".* Paragraph 5.10.14 then goes on to state that the SoS *"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*".

7.2.5 Paragraphs 5.10.16 to 5.10.25 of NPS EN-1 require the applicant to undertake a landscape and visual assessment of the effects during construction and operation on landscape components and landscape character and provide guidance on how landscape and visual matters should be considered in the design of the development and assessed by applicants. In particular, paragraph 5.10.21 states that the assessment "*should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity*". The use of landscape management plans by applicants to enhance landscape is encouraged in paragraph 5.10.24, confirming that this will "*help to enhance environmental assets where they contribute to landscape and townscape quality*". Paragraph 5.10.25 suggests *"In considering visual effects, it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development".*

7.2.6 With regard to mitigating the effects of development on landscape and visual receptors, it is acknowledged in paragraph 5.10.26 of NPS EN-1 that while reducing the scale of energy infrastructure can help to mitigate effects, doing so, or amending the design, may result in a significant operational constraint and reduction in function, including electricity generation output. Paragraph 5.10.27 states "*Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed Proposed Development, as will sympathetic landscaping and management of its immediate surroundings*".

7.2.7 Paragraph 5.10.35 of NPS EN-1 states that "*the scale of energy project means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*". Paragraph 5.10.36 directs the Secretary of State to "*consider whether any adverse impacts are temporary, such as during construction, and/or is capable of being reversed in a timescale that is considered reasonable*". Paragraph 5.10.37 adds *"The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation".*

7.2.8 Paragraph 5.10.37 of NPS EN-1 sets out that the Secretary of State should "*consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation*".

7.2.9 Section 2.8 of NPS EN-3 (DESNZ, 2024) applies to offshore wind (including onshore and offshore substations), as well as cabling for all types of electricity network infrastructure including offshore transmission (paragraph 2.8.5). Paragraph 2.8.204 directs applicants *"to address impact on seascape in addition to the landscape and visual effects discussed in Section 5.10 of EN-1"*.

7.2.10 Paragraph 2.2.10 of NPS EN-5 (DESNZ, 2024) reiterates Schedule 9 to the Electricity Act, *"which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to 'have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and … do what [they] reasonably can*

*to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects".*

7.2.11 Paragraph 2.9.7 acknowledges that, *"while government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 of the Electricity Act 1989 (…), in practice new overhead lines can give rise to adverse landscape and visual impacts"*.

7.2.12 Paragraph 2.9.10 reminds applicants of the "*cumulative adverse landscape, seascape and visual impacts* [that] *may arise where new overhead lines are required along with other related developments such as substations, wind farms and/or other new sources of generation*".

7.2.13 Paragraph 2.11.2 makes it clear that the *"Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (…)"*.

7.2.14 Paragraph 2.11.6 sets out that, for developments outside protected landscapes and "*in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate"*

7.2.15 Paragraphs 132, 135, 139, 140, 187, 189, 190, 191 and 198 of the NPPF and the PPG for the 'Natural Environment' contain similar landscape and visual policies to the NPS and are therefore not repeated here.

### Local Planning Policy

7.2.16 Policy SCLP3.4 (Proposals for Major Energy Infrastructure Projects) of the SCLP (East Suffolk Council, 2020) states the Council will assess major energy infrastructure projects based on their scale, impact, and cumulative effects, working with various stakeholders to ensure community benefits, environmental protection, and effective mitigation of impacts, including through robust assessments and ongoing monitoring.

7.2.17 Policy SCLP10.4 (Landscape Character) of the SCLP sets out that development proposals must align with the Suffolk Coastal Landscape Character Assessment, protecting and enhancing key landscape features, visual relationships, and green infrastructure, and must avoid significant adverse impacts on sensitive landscapes, including the Area of Outstanding Natural Beauty, with a focus on integration, mitigation, and preserving tranquility and dark skies.

7.2.18 Policy SCLP11.1 (Design Quality) of the SCLP requires proposals to *"demonstrate a clear understanding of the character of the built, historic and natural environment and use this understanding to complement local character and distinctiveness through robust evidence, informed sources and site specific context analysis".*

7.2.19 Policy GI06 (Landscaping and Green Infrastructure) of the TLP (Thanet District Council, 2020) promotes the creation, protection, enhancement, and management of a network of green spaces and ecological features to improve biodiversity and the quality of life for residents.

7.2.20 Policy SP26 (Landscape Character Areas) of the TLP aims to conserve and enhance Thanet's distinctive landscape character and local distinctiveness by guiding development to respect and integrate with the area's natural features and vistas. This policy singles out Landscape Character Areas E1 (Stour Marshes), E2 (Wade Marshes)

and Pegwell Bay (F1) as "*largely undeveloped and key to retaining the island character of Thanet"* and therefore seeks to direct development away from these areas.

7.2.21 Policy NE2 (Landscape Character and the Kent Downs AONB) of the DDLP emphasises that proposals must consider the specific landscape characteristics of the area, such as landform, vegetation, wildlife habitats, and historical features.

## Assessment Conclusions

### Overview

7.2.22 This section provides an overview of the assessments of likely significant landscape and visual effects resulting from the Suffolk Onshore Scheme and the Kent Onshore Scheme during their operation, maintenance and decommissioning phase.

7.2.23 The significance of effects on Suffolk Onshore Scheme landscape receptors for each phase of the Proposed Project is set out in **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment.** A detailed visual baseline and assessment is provided in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**.

7.2.24 For a detailed assessment of the significance of effects on Kent Onshore Scheme landscape receptors for each phase of the Proposed Project, please refer to **Application Document 6.3.3.1.C Appendix 3.1.C Landscape Designation and Landscape Character Assessment.** A detailed visual baseline and assessment is provided in **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment**.

7.2.25 During the construction phase, the landscape and visual assessment of the Suffolk and Kent Onshore Schemes has concluded that some landscape and visual receptors would experience significant adverse effects. These effects are, by nature, temporary. 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. For further details on the construction programme, please refer to **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.

7.2.26 Effects during the decommissioning phase of both schemes would be no greater than effects identified at construction, would be temporary and were not considered separately in the assessments.

7.2.27 There are predicted to be several significant landscape and visual amenity effects during the operational phase that would result from the presence of above ground infrastructure including the converter stations and substations. These are discussed further below.

### Suffolk Onshore Scheme

7.2.28 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme.

7.2.29 The following scenarios with regard to Friston Substation have been considered in the assessment:

- Friston Scenario 1: Friston Substation is installed under the current consent secured by 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' (Sea Link would undertake fit out works only, internal to the fenced compound);
- Friston Scenario 2: Friston Substation is built as part of the Proposed Project.

7.2.30 As explained in **Application Document Part 1 Introduction Chapter 4 Description of the Proposed Project,** Friston Scenario 2 is considered highly unlikely to occur.

7.2.31 In Friston Scenario 1, the landscape and visual effects from the Friston Substation have already been assessed under the consents for EA1N and EA2 Offshore Wind Farms as being acceptable. It is noted that at the time of application for the EA1N and EA2 projects there were two options for the Friston Substation design, one using air insulated switchgear and another using gas insulated switchgear. The footprint of the former is significantly larger than the latter and the latter is the technology now selected. The landscape and visual effects of both options were considered acceptable by the SoS in consenting EA1N and EA2.

7.2.32 A summary of the landscape receptors likely to experience significant adverse effects during the operation and maintenance phase at Year 1 and Year 15 is as follows:

- Year 1:
  - Under Friston Scenario 1, Local Character Area (LCA) L1 (Heveningham and Knodishall Estate Claylands) and LCA B4 (Fromus Valley) would both experience a moderate (significant) adverse effect, due to the permanent location of the Saxmundham Converter Station and the River Fromus Bridge within their respective landscape.
  - The Saxmundham Converter Station would be located within a large-scale agricultural field enclosure and would adversely affect the rural character of LCA L1, but this would be tempered by influences from busy road networks (including the B1119), existing pylons and overhead lines, large-scale agricultural buildings and land uses (Christmas tree plantation).
  - The River Fromus Bridge would be permanently located in LCA B4 and would be an incongruous addition to the landscape, creating a permanent gap in the vegetation network along the River Fromus. This effect is not significant by year 15 as the vegetation matures.
  - Regarding LCA L1 under Friston Scenario 2, additional to the above, the permanent infrastructure of the Friston Substation would be directly located in a very small part of the edge of the LCA, resulting in a localised increase in energy infrastructure in the rural land use of the LCA.
- Year 15:
  - Only LCA L1 would still experience a moderate and therefore significant adverse effect (under Friston Scenario 1), due to the permanent introduction of the Saxmundham Converter Station and the Friston Substation in the landscape.
  - By year 15, the proposed landscape mitigation planting around the Suffolk Onshore Scheme would provide partial screening and landscape integration, but the overall scale and nature of the Suffolk Onshore Scheme within a localised area of the LCA would remain a large alteration to the key characteristics of the

LCA, including the deeply rural character and the limited intrusion from modern development.

- Regarding LCA L1 under Friston Scenario 2, additional to the above, there would remain a localised increase in large-scale energy infrastructure, but landscape planting would have matured to provide a degree of partial screening and landscape integration.

7.2.33 A summary of the visual receptors likely to experience significant adverse effects during the operation and maintenance phase of the Suffolk Onshore Scheme at Year 1 and Year 15 is as follows:

- Year 1:
  - Under Friston Scenario 1, nine viewpoints out of the 23 representative viewpoints (representative viewpoints 1, 3, 4, 5, 15, 19, and 21 which are all located in the local landscape around Saxmundham Converter Station from all directions), and representative viewpoints 2 and 20 (to the west of the River Fromus bridge crossing) would experience significant adverse effects from the operation of the Saxmundham Converter Station and the River Fromus bridge.
  - The Saxmundham Converter Station would introduce a large-scale uncharacteristic feature within the view of otherwise arable land and would obstruct long-distance views across arable farmland dependent on the angle of the view. There are viewpoints that would include views of the Converter Station, River Fromus bridge and access road. The effects from these viewpoints would also be affected by the ancillary elements of the project associated with the access, including the permanent loss of a section of mature vegetation along the eastern edge of the River Fromus. It is noted that the gaps in vegetation would not be entirely uncharacteristic due to existing gaps in the mature vegetation network.
  - Under Friston Scenario 2, three additional viewpoints (representative viewpoints 6,7, and 22 which are all located in the local landscape around the Friston Substation) would be affected.
- Year 15:
  - Under Friston Scenario 1, nine viewpoints out of the 23 representative viewpoints (representative viewpoints 1, 3, 4, 5, 15, 19, and 21 which are all located in the highly localised landscape around Saxmundham Converter Station from all directions, and representative viewpoints 2 and 20 to the west of the River Fromus bridge crossing) would continue to experience significant adverse effects. The planting associated with the River would assist in partially restoring the permanent tree loss along the River Fromus but the Saxmundham Converter Station would remain a noticeable change in the view, due to its scale and massing.
  - Under Friston Scenario 2, the Friston Substation would remain visible from three additional viewpoints (representative viewpoints 6, 7 and 22). Visual effects on these receptors would remain significant, but proposed landscape planting would help soften views towards the permanent infrastructure.

7.2.34 The visual assessment is supported by visualisations illustrating landscape mitigation at Year 15 (see **Application Document 6.4.2.1.10 Part 2 Suffolk Representative Viewpoint Visualisations**).

## Kent Onshore Scheme

7.2.35 **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme.

7.2.36 A summary of the significantly affected landscape receptors during the operation and maintenance phase at Year 1 and Year 15 is as follows:

- Year 1:
  - One landscape receptor (LCA E1 Stour Marshes) would experience significant adverse effects, mainly due to the permanent location of the Minster Converter Station and Minster Substation within the landscape.
  - Due to the location on the edge of the marshes, the operational infrastructure is considered to impact the key characteristics of the LCA at a local level, including localised increase in development, but the majority of key characteristics would remain largely unaffected as they are either not present in the baseline or are conserved.
- Year 15: no residual significant adverse effects are expected at Year 15 of operation across the landscape and seascape receptors.

7.2.37 A summary of the significantly affected visual receptors in Kent is as follows:

- Year 1:
  - Four representative viewpoints (viewpoints 4, 5, 6, and 11 which are all located in the local landscape to the north of the Minster Converter Station and Substation and also the HVAC OHL works) would experience significant adverse effects from the Kent Onshore Scheme.
  - The Minster Converter Station and Minster Substation would appear as a large-scale feature in the view of otherwise arable land, but the context of existing energy infrastructure (including Richborough Energy Park) would typically be within the same part of the view, reducing the degree of change.
  - The HVAC OHL works would add to the wirescape and be visible alongside existing towers and OHL, increasing the concentration of vertical features.
- Year 15:
  - Four representative viewpoints (viewpoints 4,5, 6 and 11 which are located in close proximity to the north and north west of Minster Converter Station and Minster Substation) would still experience significant adverse effects due to the permanent visibility of the infrastructure.
  - By Year 15, the landscape mitigation planting to the north of the Minster Converter Station and Minster Substation would have matured and helped to screen views of the permanent infrastructure. However, the upper parts of the infrastructure would still be visible, especially due to its scale and massing.

7.2.38 The visual assessment is supported by visualisations illustrating landscape mitigation at Year 15 (see **Application Document 6.4.3.1.8 Part 3 Kent Representative Viewpoint Visualisations**).

## Appraisal of the Suffolk and Kent Onshore Schemes

7.2.39 In accordance with paragraphs 5.10.16 to 5.10.25 of NPS EN-1 (DESNZ, 2024), a landscape and visual assessment of the Suffolk and Kent Onshore Schemes has been undertaken.

7.2.40 Published landscape and seascape character documents have been used as a means of assessing the landscape effects. The assessments of the Suffolk and Kent Onshore Schemes refer to specific LCAs, in line with paragraph 5.10.17 of NPS EN-1 that encourages using Landscape Character Assessments to guide development. LCA L1 in Suffolk and LCA E1 and LCA A2 in Kent are evaluated for their sensitivity to development. Both areas are identified as being moderately sensitive due to their rural and agricultural nature, with existing infrastructure mitigating some visual impacts. This approach aligns with NPS EN-1 paragraph 5.10.4, which emphasises considering the sensitivity of landscapes and their ability to absorb changes.

7.2.41 As advised by paragraph 5.10.25 of NPS EN-1, case study examples of existing permitted infrastructure are contained in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent**. Viking Link at Bicker Fen shares some similar sensitive residential and recreational receptors with a similar magnitude of impact.

7.2.42 In line with paragraph 2.9.10 of NPS EN-5, intra-project cumulative effects, considering the potential significant cumulative effects that may arise when multiple aspects of a project impact a single receptor worsening the resultant effect, have also been addressed in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects** and **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Intra-Project Cumulative Effects.** Whilst significant intra-project cumulative effects are identified for residential receptors during construction and decommissioning (from visual amenity effects and noise and vibration effects), no such effects are identified during the operation and maintenance phase, in relation to the Suffolk Onshore Scheme or the Kent Onshore Scheme. Consideration of inter-project cumulative effects (arising from the Proposed Project in combination with 'other developments') are addressed in **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.**

7.2.43 Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Proposed Project. As advised in paragraph 5.10.19 of NPS EN-1, landscape and visual matters were considered in the early stages of siting and design. **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project. It explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.

7.2.44 Relevant embedded measures are set out in **Application Document 7.5.3.2 CEMP Appendix B REAC**. This includes the preparation of **Application Document 7.5.7.1**

**oLEMP – Suffolk** and **Application Document 7.5.7.2 oLEMP – Kent**. The oLEMPs provide a framework for delivering the landscape and ecological mitigation strategy and the successful establishment and future management of proposed landscape and ecology works associated with the Suffolk and Kent Onshore Schemes.

7.2.45 The overall objective of the landscape design is to integrate the Suffolk and Kent Onshore Schemes into their landscape settings and to avoid or minimise adverse landscape and visual effects as far as practicable. Key objectives of the landscape design include:

- Suffolk Onshore Scheme:
  - To replace habitat loss as a result of construction and enhance habitats through the creation of woodland, hedgerow, grassland and riparian habitats.
  - To extend and enhance the woodland planting along the western and southern boundaries with native woodland planting to provide structural screening to the Saxmundham Converter Station.
  - To introduce native hedgerow and tree planting along sections of the B1119 to create vegetative layers within the landscape and partially screen views of the Saxmundham Converter Station, whilst maintaining some views of the planted edge of Saxmundham
  - To strengthen areas of existing planting to provide greater biodiversity and screening function around the River Fromus bridge.
  - To increase green infrastructure opportunities including consideration of permissive access across the Saxmundham Converter Station site and establishment of an attractive amenity value for users of the permanent PRoW diversions.

  Kent Onshore Scheme:
  - To replace habitat loss as a result of construction and enhance habitats through the creation of woodland, hedgerow, grassland and riparian habitats.
  - To use native woodland planting to provide structural screening to the Minster Converter Station and Minster Substation in views from the north and northwest whilst providing containment to the site so that it appears visually connected to the Richborough Energy Park rather than the wider marsh landscape.
  - To reinforce the pattern of drainage ditches with appropriate marginal planting and establish a sensitive interface between the Minster Converter Station and Substation site and the wider marsh landscape.

7.2.46 The landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. Full details of the landscape strategy are provided in the oLEMPs (**Application Document 7.5.7.1 oLEMP – Suffolk** and **Application Document 7.5.7.2 oLEMP – Kent**).

7.2.47 Design principles have been developed to guide the detailed design of the Saxmundham Converter Station, River Fromus bridge and Minster Converter Station and Substation, in terms of the building form and external materials. This is set out in:

- **Application Document 7.11.1 Design Approach Document – Suffolk**
- **Application Document 7.12.1 Design Principles – Suffolk**

- **Application Document 7.11.2 Design Approach Document – Kent**
- **Application Document 7.12.2 Design Principles - Kent.**

7.2.48 The design principles would include:

- Suffolk Onshore Scheme:
  - Locating the Saxmundham Converter Station as far as practicable within the southern extent of the site, away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact.
  - Consideration of the orientation and massing of the Saxmundham Converter Station in order that existing landscape features can be retained and enhanced (woodland, hedgerow planting); and
  - Designing and arranging the converter station building to be sympathetic to its surroundings and be integrated into the landscaped setting of the site. Buildings will be clad in appropriate material and colours designed to appear recessive within the landscape, to help integrate the building into the landscape and views.
- Kent Onshore Scheme:
  - Locating the smallest compounds as close to each other as possible to reduce visual impact and maximise the space for landscape mitigation.
  - Consideration of the orientation of the converter station in conjunction with the preferred building and equipment arrangements, access route and alignment of the cable corridor to retain as much of the existing landscape features as possible, and to reduce gaps in the key views.
  - Building shapes to be considered as part of the detailed design approach to seek opportunities to reduce height and massing.

7.2.49 The measures detailed above reflect the emphasis in NPS EN-1 paragraphs 5.10.6 and 5.10.27 on designing projects to mitigate harm through careful siting, materiality, and sympathetic landscaping. Section 6.3 of this Planning Statement considers in further detail how the Proposed Project seeks to achieve good design.

7.2.50 In both the Suffolk and Kent Onshore Schemes, the landscape and visual assessments indicate that the construction phase would result in significant adverse landscape and visual effects, especially due to large construction compounds, drilling rigs at landfalls, presence of near shore vessels off the coast, security fencing and hoarding. These effects are however temporary. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that limited and localised significant adverse landscape and visual effects would remain in both schemes. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in paragraphs 5.10.5 and 5.10.13 of NPS EN-1.

7.2.51 In Kent, the Minster Converter Station and Substation would be constructed in a large-scale agricultural field enclosure near to the edge of LCA E1. Policy SP26 (Landscape Character Areas) specifically mentions LCA E1 as one that should be generally kept free of development, as it is "*largely undeveloped and key to retaining the island character of Thanet*". The routeing and siting of the Kent Onshore Scheme has been informed by landscape and visual considerations to minimise effects on LCA E1 (as explained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main**

**Alternatives Considered**). This is in line with paragraph 5.10.12 of NPS EN-1, which directs applicants to pay particular attention to local policies based on landscape character assessment. However, the paragraph also confirms that "*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*". Paragraph 4.1.15 of NPS EN-1 also clarifies that, *"in the event of a conflict between* [a local development plan] *and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure".*

7.2.52 The requirement set out in Paragraph 2.11.2 of NPS EN-5 (DESNZ, 2024) that the Holford Rules and the Horlock Rules should be satisfied as far as is reasonably possible is addressed in Section 6.3 of this Planning Statement and in Sections 7.4 and 7.5 of **Application Document 7.3 Design Development Report.** The identification of appropriate sites for the proposed converter stations has been informed by the Horlock Rules (National Grid, 2009). Although these rules were developed for the siting of substations, they are considered appropriate for converter station sites. The rules facilitate the consideration of environmental and amenity matters within the design and siting of new substation/converter station infrastructure. National Grid employed the Holford Rules (National Grid, 1959) to inform the design and routeing of the proposed overhead lines. The rules have become accepted within the electricity transmission industry as the basis for overhead transmission line routeing.

7.2.53 In summary, it is evident that the Proposed Project has been designed carefully, and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Proposed Project), "*these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts"* (paragraph 4.2.15 of NPS EN-1. The presumption in favour of consenting CNP Infrastructure therefore applies.

7.2.54 Overall, the Proposed Project is considered to be in accordance with national and local planning policy regarding landscape and visual impacts. Whilst the Proposed Project is not in accordance with the TLP policy SP26, it is acceptable given paragraph 4.1.15 of NPS EN-1.

## 7.3 National Landscape Impacts

7.3.1 The Suffolk Onshore Scheme lies partially within the Suffolk and Essex Coast and Heaths National Landscape (also known as an Area of Outstanding Natural Beauty, AONB). The elements of the Suffolk Onshore Scheme within the National Landscape are the Suffolk Landfall and a section of the HVDC underground cable corridor (from Miller's Covert, just north-west of the South Warren Golf Course, to the coast, as shown in **Application Document 6.4.2.1.2 Landscape Context and Designations).**

7.3.2 No element of the Kent Onshore Scheme is located within an AONB or will have an impact on an AONB and therefore the appraisal of national landscape impacts for the Kent Onshore Scheme is not required. This section sets out how the Suffolk Onshore Scheme seeks to further the statutory purposes of the AONB which is to 'conserve and enhance natural beauty'.

# Planning Policy and Legislative Context

## Relevant Legislation

7.3.3 Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (HM Government, 2023) amends Section 85 of the Countryside and Rights of Way Act 2000 in relation to the duty placed on relevant authorities in respect of their functions which affect land in National Landscapes in England This duty is now to '*seek to further'* the purpose of the AONBs and replaces the former duty to '*have regard'* to the purpose of AONBs. The purpose of AONBs is to conserve and enhance the natural beauty of the AONB.

## National Planning Policy

7.3.4 The Suffolk and Essex Coast and Heaths AONB is confirmed in NPS EN-1 paragraph 5.10.7 (DESNZ, 2024) as *"having the highest status of protection in relation to landscape and natural beauty".*

7.3.5 Paragraph 5.10.32 in NPS EN-1 states that "*When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such 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 4.2 of EN-1;
- and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated".

7.3.6 A similar policy is set out at paragraph 190 of the NPPF. Paragraphs 038 Reference ID: 8-038-20190721 to 042 Reference ID: 8-042-20190721 of NPPG also provide guidance on development within AONBs, which emphasise the importance of conserving and enhancing their landscapes and scenic beauty,

7.3.7 Given the Proposed Project is CNP infrastructure, paragraph 4.2.8 states that the CNP policy will *"influence how the Secretary of State considers tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application".* Paragraph 4.2.17 then explains that this "*means that the Secretary of State will take a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: (…) where development in nationally designated landscapes requires exceptional circumstances to be demonstrated (…)".*

7.3.8 Paragraph 5.10.33 applies to development proposals located within designated landscapes and states that, for these proposals, the *"Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development".*

7.3.9 Paragraph 5.10.34 relates to applications for projects outside designated landscapes which may have impacts within them, stating that the duty to seek to further the purposes of nationally designated landscapes also applies to these applications.

Paragraph 2.2.11 of NPS EN-5 (DESNZ, 2024) reminds transmission and distribution licence holders of their statutory duty, under Schedule 9 to the Electricity Act 1989, to "*have regard to the desirability of preserving natural beauty*". Paragraph 2.2.11 adds: "*Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023".*

7.3.10 NPS EN-5 also references the Horlock Rules providing guidelines for the design and siting of substations and the Holford Rules providing guidelines on the routing of overhead lines. EN-5 summarises the Horlock Rules as stating that the location of substations should *"seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections".* NPS EN-5 paragraph 2.9.20 goes on to state that *"Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)."*

### Local Planning Policy

7.3.11 Policy SCLP10.4 (Landscape Character) of the SCLP (East Suffolk Council, 2020) states:

"*Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts. Planning permission for major development in the Area of Outstanding Natural Beauty will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, subject to the considerations set out in the National Planning Policy Framework.*"

### Relevant Guidance

7.3.12 The Suffolk Coast and Heaths AONB Management Plan 2023-2028 (Suffolk Coast & Heaths National Landscape, n.d.) sets out a vision for the AONB and has been published for the period between 2023-28. The Management Plan identifies opportunities and threats to delivering the statutory purpose.

7.3.13 The Management Plan states that the AONBs are designated for their natural beauty and that the natural beauty of AONBs is defined by six characteristics:

- Landscape quality
- Scenic quality
- Relative wildness

- Relative tranquillity
- Natural heritage features and
- Cultural heritage.

7.3.14 The Management Plan goes on to explain that these features are described in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB): Natural Beauty and Special Qualities Indicator (November 2016) (LDA Design, 2016), which sets out the Natural Beauty and Special Qualities of the Suffolk Coast and Heaths AONB. In addition to defining those Natural Beauty qualities listed above, this document also presents the following Special Qualities:

- Health and Wellbeing
- Community
- Economy and
- Ecosystem Goods and Services.

7.3.15 Guidance was published by the Department for Environment, Food and Rural Affairs in December 2024 (DEFRA, 2024) to clarify how the Protected Landscapes duty set out in Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 is intended to operate and provide broad principles to guide relevant authorities in complying with it. This guidance confirms that the Protected Landscapes duty applies (inter alia) in *"decision making in respect of development management, planning applications and nationally significant infrastructure projects", "when considering the appropriateness of avoidance, mitigation, and compensation measures"* and in *"functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape".*

## Assessment Conclusions

### Landscape and Visual Impact of the Suffolk Onshore Scheme on the Suffolk and Essex Heaths and Coast AONB

7.3.16 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme. The assessment concludes that there would be no significant adverse effects on designated landscapes, including the Suffolk Heaths and Coast AONB, arising from the Suffolk Onshore Scheme.

7.3.17 As set out in Section 1.7 of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, in line with national policy requirements, the Proposed Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to site the converter station away from the AONB to limit effects on its setting. This results in predominantly temporary direct effects in localised areas of the AONB associated with the HVDC cable laying (such as minor vegetation removal and temporary displacement of agricultural land and acid grassland). Following construction, the temporary works associated with the landfall and HVDC corridor would be fully reinstated in accordance with control and management measures outlined in **Application Document 7.5.7.1 oLEMP – Suffolk.** The effect at Year 15 of operation is therefore considered to be negligible. During the operation and maintenance phase, the Saxmundham Converter Station and Friston Substation are not likely to be perceptible from the AONB, as

demonstrated in **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations**. Through the design and mitigation, the Proposed Project has sought to minimise impacts on the landscape of the AONB and therefore conserve its beauty.

### Impacts of the Suffolk Onshore Scheme on the statutory purposes of the AONB

7.3.18 **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** provides a full assessment of landscape character effects of the Suffolk Onshore Scheme at construction and operation and maintenance on the Suffolk and Essex Coast and Heaths AONB, taking into account the Natural Beauty indicators of the AONB (Landscape quality, Scenic quality, Relative wildness, Relative tranquillity, Natural heritage features and Cultural heritage). The assessment concludes that the magnitude of effect on the statutory purpose of the AONB relating to Natural Beauty indicators is considered negligible as the only direct and indirect changes arising from the Suffolk Onshore Scheme at Year 15 would be highly localised and representing a very slight alteration to the key characteristics of the AONB and its setting.

7.3.19 The assessment of the impacts of the Suffolk Onshore Scheme on the statutory purpose of the AONB relating to Special Qualities indicators (Health and Wellbeing, Community, Economy and Ecosystem Goods and Services) during construction and operation and maintenance are presented in Appendix F of this Planning Statement. The effects for all the Special Qualities indicators are considered to be not significant.

7.3.20 On the basis of the above, the Suffolk Onshore Scheme is not therefore likely to detract from the Natural Beauty and Special Qualities of the AONB.

### Furthering the statutory purposes of the AONB

7.3.21 The Proposed Project includes an area of land (circa 6 ha) within the Order Limits for delivering enhancement to the AONB located to the south of the A1094, as identified on **Figure 4 Saxmundham Converter Station Enhancement Areas.** The land identified in the Order Limits for this enhancement is much larger than 6 ha to provide flexibility over how and where enhancement can be delivered as part of the detailed design. The area of land is located within the AONB and currently comprises arable and modified grazing land in the northern part and a mosaic of acid grassland, bracken, gorse scrub and birch woodland in the southern part. The establishment of acid grassland is proposed in the northern part and enhancement of acid grassland, in the southern part, including bracken control, conservation grazing and scrub cutting. For further details on the enhancement and management of this resource, please refer to **Application Document 7.5.7.1 Outline Ecological and Management Plan– Suffolk**. The provision of the Acid Grassland is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured through Requirement 6 of **Application Document 3.1 Draft DCO**.

7.3.22 The proposed acid grassland enhancement within the AONB is considered to target the Natural Beauty and Special Quality indicators of the Suffolk and Essex Coast and Heaths AONB as it has multifunctional purposes to further the purposes of the AONB, notably including landscape, ecology and Biodiversity Net Gain. The following points set out how each of the relevant indicators are targeted through the acid grassland enhancement and provision:

- Landscape and scenic quality and relative wildness: Acid grassland is noted as an important habitat within the AONB indicators (LDA Design, 2016), such that the

enhancement and provision would assist in forming a larger area of this habitat. The AONB indicator also notes that some landscape is in a poor condition due to agricultural land use, which the replacement of agricultural land with acid grassland would assist in improving. The enhancement would also assist in enlarging the area of the unique character of the AONB. Despite the location next to the road network of the A1094, the replacement of agricultural land with acid grassland would result in a comparatively wilder and more tranquil land use type within the AONB as there would be less active management.

- Natural heritage features: the provision of well-structured acid grassland will in turn provide nesting habitat for skylarks and foraging (and potentially nesting) habitat for woodlarks.
- Community: It is noted that the provision of acid grassland may be also able to create habitats favourable for skylark which would assist in creating and furthering the strong links between the community and the landscape by providing amenity enhancement from nearby recreational routes.
- Ecosystem goods and services: the replacement of agricultural land with acid grassland provides further carbon sequestration in soils which contributes to climate change mitigation.

7.3.23 Whilst the provision of acid grassland would not directly support the cultural heritage, economy or health and wellbeing indicators, it would not adversely affect these indicators.

7.3.24 The enhancement of the area of land within the AONB is considered to contribute to aspirations within the Suffolk Coast and Heaths AONB Management Plan, as set out as follows:

- the Management Plan Policies note that land management should conserve and enhance natural beauty, as is set out above, whilst providing for nature recovery, which it is considered that the enhancement provisions would contribute towards.
- the Management Plan Policies note the requirement for local distinctiveness to be conserved and enhanced, and as acid grassland is a key habitat in the AONB it is considered the enhancement promotes this.
- the Management Plan Policies highlight the importance of climate change mitigation and adaptation, which the provision of acid grassland as a replacement to agricultural land would contribute towards.
- the Management Plan notes that much of the AONB was once heathland and some has been converted to agricultural land use which results in a decline in biodiversity. The replacement of agricultural land with acid grassland would assist in rectifying some of this land use change and increasing biodiversity.

7.3.25 The enhancement also links to a Suffolk Coast and Heaths AONB contribution to the Protected Landscapes Targets and Outcomes Framework for restoring or creating wildlife-rich habitats in Protected Landscapes outside of protected sites.

7.3.26 The approach to the assessment of potential effects on the AONB and the Protected Landscapes duty have been discussed with stakeholders, specifically the Suffolk and Essex Coast and Heaths National Landscape Partnership (SECH Partnership), through landscape and visual thematic meetings and specific meetings to discuss the AONB.

## Appraisal of the Suffolk Onshore Scheme

7.3.27 The Proposed Project aligns with NPS EN-5 in how it has approached siting of infrastructure with regard to the AONB. In line with the Horlock Rules summarised in paragraph 2.9.19, National Grid has 'avoided altogether' locating the Converter Station and Substation inside the AONB and further minimised effects through sensitive siting of these aspects of development to avoid significant effects on its setting. The electricity connection in the AONB is an underground cable, again, meeting the requirements of NPS EN-5 by applying the presumption that connections within an AONB should be located underground.

7.3.28 Paragraph 5.10.32 in NPS EN-1 (DESNZ, 2024) advises that the SoS should give *"substantial weight"* to the conservation and enhancement of AONBs' natural beauty and adds that the SoS may give development consent in nationally designated landscapes in exceptional circumstances. It is considered that the Suffolk Onshore Scheme meets the tests set out in paragraph 5.10.32 of the NPS and paragraph 187 of the NPPF (need for the development, cost of and scope for developing elsewhere and any detrimental effect on the environment, landscape and recreational opportunities), as discussed below.

7.3.29 The need for the development is set out in Section 5 of this Planning Statement and detailed in **Application Document 7.2 Strategic Options Back Check Report.** This report explains that the Proposed Project will reinforce the transmission system in the South East of England and East Anglia. This reinforcement is required because the existing network does not currently have the capacity to accommodate the connection of renewable and low-carbon energy sources (from offshore wind, interconnectors and nuclear power) forecasted to connect to the network and to transport electricity to where it is used. This is in the context of the government's targets for the connection of up to 50 GW of offshore wind by 2030 (paragraph 3.3.21 of NPS EN-1) to secure clean and affordable British energy for the long term.

7.3.30 In November 2024, the National Energy System Operator published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (NESO, 2024). This report states that *"Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030."* The Proposed Project is specified as one of those three projects.

7.3.31 Without reinforcement, the 'Thermal Boundary Export Limit' – the physical maximum energy capacity that the system can accommodate during planned system faults – would be exceeded, preventing export of power to demand centres beyond East Anglia. In some conditions, generators connecting in the area would be required to reduce their output. Generators would then have to be compensated via a 'constraint' payment, and additional payments made to non-constrained generators outside of the area to ensure that supply matches demand. These costs would be passed on to end consumers. Analysis from the Electricity System Operator (ESO) shows that, in this case, predicted constraint costs are likely to significantly exceed those of reinforcement, providing a further driver to reinforce the system. This is explained in further detail in **Application Document 7.2 Strategic Options Back Check Report.**

7.3.32 In summary, the Proposed Project will contribute to the urgent need for new electricity networks, to enable new renewable electricity generation and interconnection infrastructure that the UK needs to enable the transition to net zero while maintaining energy security (as set out in paragraph 3.3.66 of NPS EN-1).

7.3.33 With regard to the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for the Proposed Project in some other way, as set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)** none of the potential route corridors identified in the routeing and siting phase of the project for the Suffolk landfall areas of search could avoid the AONB altogether. As the connection is required in the Sizewell area and the AONB extends along the coast without interruption from Felixstowe and Harwich in the south to Kessingland in the north, it is not possible to avoid this designation and meet the need case without a significantly longer and indirect route that would not be in accordance with National Grid's statutory duties.

7.3.34 The third bullet point of paragraph 5.10.32 requires the SoS to consider "*any detrimental effect on the environment, the landscape and recreational opportunities*". The development in the AONB associated with the landfall and HVDC would be fully reinstated and consequently there would not be significant recreation, PRoW, visual or landscape effects on the AONB following construction when the project is considered individually. The visual effects on the AONB during construction would be minor (not significant), and of a similar magnitude for other receptors associated with the AONB. There is the potential for significant adverse cumulative landscape and visual effects during construction and decommissioning for the short term and temporary period as a result of potential simultaneous or sequential construction of the Suffolk Onshore Scheme, Sizewell C, EA1N, EA2 and LionLink connector. It should be noted of course that the cumulative benefits of four NSIPs are very significant, particularly in meeting Net Zero, and this should be taken into consideration when considering the cumulative adverse effects of the developments on the AONB.

7.3.35 On the basis of the above, exceptional circumstances therefore exist to justify the Proposed Project in the Suffolk and Essex Heaths and Coast AONB and it has been demonstrated that the Proposed Project is critical to the delivery of clean power, and therefore in the public interest. Notwithstanding this, the Proposed Project comprises CNP infrastructure and the starting point for the SoS's decision-making in this case is that exceptional circumstances to justify the Proposed Project's location in the AONB are demonstrated as per paragraph 4.2.17 of NPS EN-1.

7.3.36 The Proposed Project will include an area of land (circa 6 ha) to the south of the A1094 within the Order Limits for delivering acid grassland enhancement to the AONB. As demonstrated above, this enhancement targets the Natural Beauty and some of the Special Qualities indicators of the AONB and contributes to aspirations set out in its Management Plan, and will therefore further the statutory purposes of the AONB. It is considered that, in accordance with paragraph 5.10.33 of NPS EN-1, this measure, which seeks to further the purposes of the designation, is sufficient, appropriate and proportionate. It demonstrates how National Grid will fulfil its statutory duty to seek to further the purpose of conserving and enhancing the natural beauty of the AONB, as set out in Section 85 of the Countryside and Rights of Way act 2000, as well as its statutory duty under Schedule 9 of the Electricity Act 1989 and in compliance with Policy SCLP10.4 (Landscape Character) of the SCLP.

7.3.37 Paragraph 5.10.34 of NPS EN-1, confirms that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for

projects outside the boundaries of these areas, which may have impacts within them. The Proposed Project is partially located within the AONB and extends beyond its boundary. However, this would not result in additional impacts within the AONB. Construction activities associated with the Saxmundham Converter Station or Friston Substation is not likely to be perceptible from the AONB other than in a very localised area of the AONB. Similarly, the operational Saxmundham Converter Station or Friston Substation are not likely to be perceptible from the AONB. Please refer to **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** for further details.

7.3.38 Paragraph 2.2.11 of NPS EN-5 (DESNZ, 2024) notes that statutory duties under Section 85 of the Countryside and Rights of Way Act 2000 may apply. As noted above, the provision of Acid Grassland will seek to further the purposes of the AONB in accordance with this Act.

# 7.4 Ecology and Biodiversity

## Planning Policy Context

### National Planning Policy

7.4.1 Paragraph 5.4.4 of NPS EN-1 (DESNZ, 2024) introduces the Habitat Regulations and the Habitats Regulations Assessment (HRA), and states that "*the highest level of biodiversity protection is afforded to sites identified through international conventions*". The Habitat Regulations set out sites for which an HRA is required, including Special Areas of Conservation and Special Protection Areas.

7.4.2 Paragraph 5.4.7 of NPS EN-1 also recognises SSSIs as sites of international importance, affording features of SSSIs not covered by an international designation, a high level of protection. Paragraph 5.4.8 states that "*development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted*". This is unless the benefits, including need, of the development outweigh both its likely impact on the SSSI and any broader impacts on the national network of SSSIs.

7.4.3 Sites of regional and local biodiversity and geological interest are outlined in NPS EN-1 paragraph 5.4.12, which identifies the important contribution to ecological networks and nature recovery these provide, including wider benefits associated with public access and climate mitigation. This includes local wildlife sites (LWS) with paragraph 5.4.13 confirming that local development plan policies should *"secure their protection from harm or loss but also help to enhance them and their connection to the wider ecological networks.*"

7.4.4 Paragraphs 5.4.14 to 5.4.15 of NPS EN-1 set out national policy consideration with respect to ancient woodland, ancient trees, and veteran trees stating that the government is committed to *"maintain and enhance the existing resource of known ancient and veteran trees*" and that "*ancient and veteran trees found outside ancient woodland are particularly valuable*". Paragraph 5.4.14 identifies Ancient Woodland as an irreplaceable habitat. NPS EN-1 paragraph 5.4.32 states that applicants should "*include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases*".

7.4.5 NPS EN-1 paragraph 5.4.17 states that the applicant should ensure that the "*ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats*". Opportunities to conserve and enhance these biodiversity interests should be demonstrated by the applicant (NPS EN-1 paragraph 5.4.19). The need to consider biodiversity as part of the design, layout and future phases of proposals is set out in NPS EN-3 (DESNZ, 2024) paragraph 2.1.100.

7.4.6 Paragraph 5.4.21 of NPS EN-1 (DESNZ, 2024) outlines the opportunity for nature inclusive design throughout the design process, stating that "*Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains*".

7.4.7 NPS EN-1 paragraph 5.4.25 states that applicants should provide sufficient information to the SoS to determine whether an HRA Appropriate Assessment is required.

7.4.8 Paragraph 5.4.42 of NPS EN-1 sets out that as a general principle, development should "*avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought*".

7.4.9 NPS EN-1 paragraph 5.4.35 sets out examples of measures that applicants should demonstrate to appropriately avoid, mitigate and compensate impacts to, and enhance biodiversity. This includes, but is not limited to, confining construction activities to minimum areas required for the works; timing construction to limit disturbance; best practice measures in construction and operation to ensure impacts to species and habitats is minimised; restoration of habitats; enhancing existing habitats and where practicable, creating new habitats of value.

7.4.10 Paragraph 5.4.41 of NPS EN-1 states the "*benefits of nationally significant low carbon energy infrastructure may include benefits for biodiversity interests and these benefits may outweigh the harm to these interests*". The SoS may take account of such net benefits in decision making.

7.4.11 Paragraph 5.4.48 of NPS EN-1 requires the SoS to ensure that appropriate weight is attached to designated sites, ecological receptors and any relevant biodiversity and geological interests within the wider environment. Paragraph 5.4.52 states the SoS should give "*due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent*".

7.4.12 NPS EN-1 paragraph 5.4.53 explains that the SoS should not grant development consent if the development would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

7.4.13 Paragraph NPS EN-5 (DESNZ, 2024) explains that applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna..*".

7.4.14 Paragraph 2.11.1 of NPS EN-5 states that "*Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately".*

7.4.15 Similar policy tests to those in NPS EN-1 are set out in NPPF paragraphs 192 to 195 and are therefore not repeated. Guidance on biodiversity, geodiversity and ecosystems is also provided in NPPG (paragraphs 009 Reference ID: 8-009-20250219 to 035 Reference ID: 8-035-20190721).

### Local Planning Policy

7.4.16 SCLP Policy SCLP10.1 (Biodiversity and Geodiversity) (East Suffolk Council, 2020) states development must maintain, restore, or enhance green infrastructure and biodiversity, following a hierarchy to avoid, mitigate, or compensate for impacts; proposals affecting designated sites must provide evidence that benefits outweigh losses, achieve environmental net gains, and support ecological enhancements, with additional measures and assessments required for protected species and habitats.

7.4.17 TLP Policy SP30 (Biodiversity and Geodiversity Assets) (Thanet District Council, 2020) aims to conserve and enhance biodiversity and geodiversity by protecting designated sites, species, and habitats, and ensuring new developments contribute to ecological networks. TLP GI01 (Policy GI01- Protection of Nationally Designated Sites (SSSI) and MCZ (Thanet District Council, 2020) protects and enhances the condition of SSSIs by ensuring that development proposals do not adversely affect these sites and by promoting management practices that support their ecological integrity. TLP SP31 (Biodiversity Opportunity Areas) (Thanet District Council, 2020) states the Council will support proposals that enhance, maintain and protect the identified Biodiversity Opportunities Areas, particularly where proposals increase the biodiversity value of the site. TPL SP27 (Green Infrastructure) (Thanet District Council, 2020) promotes the integration and enhancement of green infrastructure within developments.

7.4.18 Policy NE1 of the DDLP (Dover District Council, 2024) states that "*Development proposals must provide a minimum of 10% biodiversity net gain (BNG). Proposals for BNG should be delivered on-site, taking into account local green infrastructure priorities set out in the Local Nature Recovery Strategy, the Dover District Green Infrastructure Strategy and the Kent Biodiversity Strategy. Only if it can be demonstrated that ecologically meaningful BNG that contributes to the local green infrastructure network cannot be practically and/or feasibly achieved within the site boundary, will the Council consider off-site alternatives in line with the biodiversity gain hierarchy.*"

## Assessment Conclusions: Summary

7.4.19 **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant long-term adverse effects are predicted on ecological and biodiversity receptors, as a result of the construction and operation of the Suffolk Onshore Scheme. However, due to the time required for the proposed planting to mature, significant adverse effects have been identified in the short to medium term for breeding and wintering birds and for habitats of up to regional importance. These are considered to be offset by the long-term beneficial effect of the large amounts of landscape planting proposed around the River Fromus bridge, the Saxmundum Converter Station, and the Friston Substation (in the scenario where the substation is built as part of the Proposed

Project). Therefore residual significant positive effects are anticipated in the long term for habitats, ornithology, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation.

7.4.20 **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant long-term adverse effects on ecological and biodiversity receptors are predicted as a result of the construction and operation of this part of the Kent Onshore Scheme. Due to the time required for planting to mature, significant adverse effects have been identified in the short to medium term for breeding and wintering birds and for habitats of up to regional importance. However, these are considered to be offset by the long-term beneficial effect of the large amounts of landscape planting proposed around the Minster Converter Station and Substation and the River Stour; as well as proposals for the enhancement of 10 ha of arable off-site to address permanent losses for farmland birds. Therefore, residual significant positive effects are anticipated in the long-term for, habitats, ornithology, riparian mammals, terrestrial invertebrates, and aquatic macrophytes as well as badgers, bats and reptiles due to habitat creation.

7.4.21 To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 Habitats Regulation Assessment** (HRA) **Report** has been prepared. The HRA concludes that the Proposed Project will not result in any adverse effect on site integrity (AEoSI) of the following sites: Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar.

7.4.22 An **Arboricultural Impact Assessment (AIA) (Application Document 6.10)** has been undertaken which considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits. The AIA concludes that in total, the Suffolk Onshore Scheme will result in the loss of four individual trees and part of two woodlands of high quality; twenty-five individual trees, part of four tree groups four woodlands, part of three hedgerows and one hedgerow of moderate quality; and there is likely to be removal of some low-quality trees, tree groups, part of one woodland and hedgerows. In addition, part of W12S a woodland group protected by TPO (ref: ESCC/54/00026 – W9) will require removal to facilitate the construction of the haul road, cable route and associated infrastructure. The Proposed Project has been carefully designed so that no veteran or ancient trees are to be removed. For example, the access to Saxmundham Converter Station and location of the River Fromus bridge has been designed to retain a veteran tree in the area.

7.4.23 A total of forty one individual trees, six tree groups, four woodlands and ten hedgerows are likely to require Root Protection Area (RPA) incursions to facilitate access and for the installation of new services (a permanent attenuation outfall pipe, a temporary clean water drain, and a temporary rising main). Of the RPA incursions fourteen will be required for veteran and ancient trees. Six sections of Important Hedgerow identified as such for ecological reasons would also have sections temporarily removed for the haul route and buried cable.

7.4.24 For the Kent Onshore Scheme, the **AIA (Application Document 6.10)** concludes that three individual trees, part of one hedgerow and part of one woodland all of moderate quality are likely to be removed; and there is likely to be removal of some low quality trees, tree groups and a hedgerow. No trees of high quality, veteran or ancient trees are to be removed and no trees subject to TPO are to be removed. A total of thirty two

individual trees, thirty seven tree groups, two woodlands and nine hedgerows are likely to require RPA incursions to facilitate access and existing utility line diversions. Of the RPA incursions two will be required for a veteran and ancient tree to facilitate monitoring and maintenance access. Pruning is likely to be required in the future to facilitate construction access along proposed access routes and to ensure that a adequate clearance is maintained from the proposed OHL to any part of a retained tree.

7.4.25 As set out in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. However, National Grid is committed to the delivery of 10% BNG for the Proposed Project and will seek to provide BNG in three broad ways:

- On land in National Grid's ownership, including on-site around the proposed converter stations in locations where it would not be disturbed by future development or maintenance activities;
- Through purchase of biodiversity units from commercial registered provides; and
- Through collaborative delivery off-site with trusted partner.

7.4.26 The final impact on habitats will be determined following detailed design and will be affected by, for example, whether Friston Substation is developed as part of the Proposed Project. Therefore, it is not possible to ascertain with certainty at this stage the level of BNG that can be achieved through the first mechanism above. However, **Application Document 6.12 Biodiversity Net Gain Feasibility Report** indicates that the Suffolk Onshore Scheme couldl result in a Net Gain for hedgerow units and watercourse units on-site, but additional units are likely to be required through the second and third mechanisms to meet 10% BNG for habitat units. For the Kent Onshore Scheme it is likely that the second and third mechanisms will be required to achieve 10% BNG for hedgerows, habitat areas and watercourses.

## Assessment conclusions and appraisal of Suffolk Onshore Scheme

### Internationally and nationally designated nature conservation sites

7.4.27 As required by paragraph 5.4.17 of NPS EN-1, it is necessary to determine whether the Proposed Project is likely to have a significant effect on areas that have been internationally designated for nature conservation purposes such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites, as well as proposed or potential sites (hereafter, European sites).

7.4.28 **Application Document 6.6 HRA Report** concludes that for the Suffolk Onshore Scheme, the following impact pathways were screened in for Appropriate Assessment:

- Dust impacts on nightjar and woodlark associated with the Sandlings SPA, since a construction compound and trenchless drive compound will be within 20 m of the SPA.
- Construction/decommissioning period noise and visual disturbance of nesting woodlark and nightjar at Sandlings SPA, and wintering birds using functionally-linked land for Alde Ore Estuary SPA/Ramsar, is screened into Appropriate Assessment given a construction compound and trenchless drive compound will be located adjacent to the SPA.

- Construction/decommissioning period loss of functionally-linked foraging habitat for nightjar and woodlark associated with Sandlings SPA.

7.4.29 With regard to dust impacts on nightjar and woodlark during construction, given the separation distance between the construction compound and the SPA it is unlikely that dust would be sufficiently thick in depth of layer coating leaves, and long in duration to materially interfere with photosynthesis. Therefore, the risk posed to the SPA, even in the absence of mitigation, is low. Nonetheless, it is considered necessary to implement dust control measures, to ensure that dust deposition is sufficiently insignificant such that no material dust build up would occur on vegetation within the SPA. These control and management measures are outlined in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice (CoCP)**. With these measures in place, it is considered that no AEoSI on the qualifying features of Sandlings SPA would arise.

7.4.30 With regard to the noise and visual disturbance of Sandlings SPA, throughout two seasons of breeding bird survey, no SPA birds were recorded nesting in the part of the SPA that would be subject to potentially disturbing noise levels during compound establishment. There is a restriction requiring works to be scheduled to take place between September and January inclusive and would therefore not result in disturbance of nesting nightjar or woodlark. This is secured in the **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC.** Therefore, no mitigation is required beyond standard noise fencing which is also secured through the REAC.

7.4.31 Non-breeding bird surveys of the wetland parts of RSPB North Warren Reserve, and bird records generally, have identified that it is functionally-linked to both Minsmere-Walberswick SPA/Ramsar and Alde-Ore Estuary SPA/Ramsar. It has been agreed with Natural England and RSPB that a reasonable precautionary threshold for significant disturbance would be 60 dB. Noise modelling undertaken for the project has identified that the 60 dB LAmax contour will only overlap with the RSPB reserve east of the former railway to a very small extent. The affected small area of reserve does not support significant numbers of SPA/Ramsar birds. Therefore, no AEoSI on the qualifying features of the Minsmere-Walberswick SPA or Alde-Ore Estuary SPA will arise due to noise disturbance impacts of the Proposed Project on functionally-linked habitat in RSPB North Warren Reserve. In the HRA screening it was identified that there would be loss of nightjar and woodlark foraging habitat. This will be temporary as it will occur during trenchless installation (which will occur in a single breeding season) and cable trench burial. Once that is complete the habitat will be restored and once again available for nightjar and woodlark. The creation and management of this grassland is set out in the **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**. The replacement of grassland is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured through Requirement 6 of **Application Document 3.1 Draft DCO**. Therefore, it is considered that no AEoSI on the qualifying features of Sandlings SPA would arise from this impact pathway.

7.4.32 In summary, the Suffolk Onshore Scheme will not have a likely significant effect on a European Site alone or in combination with other proposals, as set out in **Application Document 6.6 HRA Report** and in accordance with Paragraph 5.4.4 of NPS EN-1.

7.4.33 The Leiston-Aldeburgh SSSI lies within the Order Limits of the Suffolk Onshore Scheme. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** considers the impact of the Suffolk Onshore Scheme on this SSSI. The SSSI would be traversed using trenchless methods such as Horizontal Direct Drilling

(HDD). The trenchless bore would be approximately 8 m below the SSSI at the boundary and would get deeper from there, so there is minimal risk to surface habitats and hydrology. Since the potential for habitat loss is so low, this is considered a negligible impact on receptors of national importance and thus not significant. No impact pathways linking to other designated sites, including Snape Warren SSSI, are identified. In accordance, with Paragraph 5.4.7 of NPS EN-1, the Suffolk Onshore Scheme therefore avoids adverse effects on SSSIs and therefore NPS EN-1 paragraph 5.4.8 is not engaged.

### Sites of regional and local biodiversity interest

7.4.34 The Haven, Aldeburgh Local Nature Reserve lies on the coast approximately 600 m east of the closest surface construction works (the landfall and associated construction compound S10). RSPB North Warren Reserve is located adjacent to the landfall and associated construction compound S10. It supports a wide range of breeding and non-breeding birds as well as other wildlife.

7.4.35 There are 17 non-statutory County Wildlife Sites (CWS) or roadside nature reserves within 2 km of the proposed Suffolk Onshore Scheme Order Limits. These do not have specific citations or designated features but are Roadside Nature Reserve (RNR) 216, Tiggins Lane RNR, Lonely Wood CWS, Benhall Churchyard CWS, Manor Farm Meadows CWS, Aldeburgh Golf Course CWS, Grove Wood CWS, Knodishall Common CWS, Buckles Wood CWS, Kelsale Morio Meadow CWS, Benhall Green Meadows CWS, Church Common CWS, Disused Railway Line Aldringham – Aldeburgh) CWS, Suffolk Shingle Beaches CWS, Knodishall Whin CWS, Aldeburgh Old Allotments CWS, and Great Wood CWS. Great Wodd CWS, Grove Wood CWS, and Disused Railway Line CWS are the closest of these to the Proposed Project and are located adjacent to the proposed Suffolk Onshore Scheme.

7.4.36 Embedded mitigation measures are set out in section 2.8 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity.** Measures relevant to the control and management of impacts during construction, such as air quality, dust and pollution, have been included within **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**. The chapter concludes that no significant adverse effects to sites regional and local interest are predicted as a result of the Suffolk Onshore Scheme including no direct habitat loss.

7.4.37 North Warren RSPB Reserve and the Disused Railway Line (Aldringham-Aldeburgh) CWS lie within the proposed Suffolk Onshore Scheme. As set out above in relation to Leiston-Aldeburgh SSSI, which is in a similar location, the use of HDD means the potential for habitat loss is low, and therefore is considered to result in a negligible impact on these sites and thus not significant.

7.4.38 In accordance with paragraph 5.4.42 of NPS EN-1, SCLP Policy SCLP10.1 and TLP Policy SP30, the Proposed Project therefore avoids significant harm to sites of regional and local biodiversity interest.

### Ancient Woodland, veteran trees and important hedgerows

7.4.39 The **AIA (Application Document 6.10)** considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits. The design of the Proposed Project has been developed to avoid or minimise tree loss and impacts, especially to those trees with the greatest quality and value (ancient or veteran trees). Notwithstanding this, as described above, the Suffolk

Onshore Scheme will result in the loss of trees (other than ancient or veteran trees). The impacts of those tree removals will be compensated through the proposed tree planting and associated landscaping works which will represent an opportunity to enhance the quality, benefits and resilience of trees within the Suffolk Onshore Scheme Order Limits. New tree planting is detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk** and **Figure 1 Saxmundham Converter Station Outline Landscape Mitigation** and **Figure 5 Friston Substation Outline Landscape Mitigation** within **Application Document 7.5.7.1.**

7.4.40 No veteran or ancient trees are to be removed, and this commitment is secured via the **Application Document 7.5.3 Outline CEMP.** However, RPA incursions will be required for 14 veteran and ancient trees. These are required in order to facilitate proposed construction access routes and the monitoring and maintenance of access routes and construction access routes.

7.4.41 For three of the veteran trees, the existing macadam roads are considered to provide an appropriate level of ground protection, and no mitigation is likely to be required. For one of the trees, due to the high anticipated volume of traffic, fit for purpose ground protection specified to the highest expected load will be utilised. For the remaining veteran and ancient trees, all-terrain vehicles will be used to avoid soil compaction. With mitigation in place, there will be no likely adverse impact on the physiological or structural condition of the trees. Six sections of Important Hedgerow identified for ecological reasons would also have sections temporarily removed for the haul route and buried cable (see **Application Document 6.4.2.2.A Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows**) for locations). The temporary loss of Important Hedgerow comes to approximately 440 m. All of these temporary habitat losses would ultimately be reinstated and most can be reinstated in the winter following cable installation. The reinstatement of hedgerows is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured through Requirement 6 of **Application Document 3.1 Draft DCO**.

7.4.42 Moreover, due to proximity of possible compounds S04 and S05 to Important Hedgerows (identified as 3 and 5 which support bats), there is the potential for other incidental damage during construction. These hedgerows would need to be fenced to avoid incidental damage. In addition, a 20 m gap between the construction compound and hedge would be required.

7.4.43 In line with paragraph 5.4.3 of NPS EN-1, the Suffolk Onshore Scheme therefore avoids the loss or deterioration of irreplaceable habitats through suitable mitigation

### Protected Species and Other Habitats

7.4.44 Section 2.7 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** sets out the existing baseline conditions of the Suffolk Onshore Scheme including relevant protected species. The chapter concludes that no long-term residual significant adverse effects are predicted as a result of the construction and operation of the Proposed Project, in line with paragraph 5.4.14 and 5.4.15 of NPS EN-1, SCLP Policy SCLP10.1 and TLP Policy SP30. The Proposed Project is not considered to result in habitat loss for dormouse, badgers and other Protected Species.

7.4.45 Due to the impacts on hedgerows during construction outlined in the above section, there is likely to be an impact on bats which use these hedgerows for foraging and commuting resulting in a moderate adverse effect which would be significant. To mitigate this impact, larger gaps in hedgerows/woodland belts would be reduced to 10 m maximum during the night by hurdles or similar. A minimum 20 m setback from the

hedge used by barbastelle which connects Important Hedgerows 3 and 5 will be instituted and the gap for access traversing the hedgerow that runs north from Broomfield's Covert will be kept to 10 m maximum. With mitigation in place, the effect is reduced to minor adverse and not significant.

7.4.46 Long-term habitat creation around the Saxmundham Converter Station, Friston Substation (for the scenario where the substation is built as part of the Proposed Project) and permanent access, such as new woodland, hedgerows and balancing ponds, would ultimately benefit foraging and commuting bats by increasing connectivity across the Suffolk Onshore Scheme and wider countryside in the long term and improving food sources. In the long-term this would be a positive significant effect.

7.4.47 Lighting during the construction phase could also result in moderate adverse impacts to bats and fish. Around construction compounds, direct illumination of boundary features would be avoided. In addition, lighting would be designed to comply with published guidelines. With this mitigation in place, the effects would be reduced to negligible and not significant.

7.4.48 A moderate adverse impact for ornithology due to the temporary loss of acid grassland during construction is anticipated. Therefore, as part of the broader habitat mitigation proposals the Proposed Project would restore and enhance approximately 6ha of acid grassland that would be managed in a favourable way for 10 years following creation This habitat creation would result in benefits to reptiles, dormouse, badger, bats, riparian mammals and terrestrial invertebrates. In addition, the Proposed Project includes the management of 12 ha of arable land for ground nesting farmland birds, particularly skylark, maintained favourably for the lifetime of the Proposed Project.

7.4.49 Gaps in ditch marginal vegetation would either be planted with mature emergent vegetation purchased from nurseries or left to recolonize naturally from the adjacent ditch vegetation. In addition, the Proposed Project includes habitat creation, including balancing ponds around the Saxmundham Converter Station and Friston Substation, in various locations including along the River Fromus. See **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** for details. As a result, there would be a long-term net increase in wetland habitats due to the Suffolk Onshore Scheme resulting in a moderate beneficial effect.

7.4.50 As a result of the mitigation and enhancement measures set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** which are secured by the **Application Document 7.5.3.1 Outline Onshore CEMP** and **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk**, significant beneficial long-term effects are anticipated for habitats, ornithology, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to the creation of habitats.

## Assessment conclusions and appraisal of Kent Onshore Scheme

### Internationally and nationally designated nature conservation sites

7.4.51 **Application Document 6.6 HRA Report** concludes that for the Kent Onshore Scheme the following impact pathways were screened in for Appropriate Assessment:

- Direct habitat loss during the construction period at Thanet Coast & Sandwich Bay SPA/Ramsar site.

- Impacts on Thanet Coast & Sandwich Bay SPA/Ramsar site due to loss of functionally-linked land for golden plover during operation of the Kent Onshore Scheme.
- The potential for operational period collision risk cannot be dismissed, associated with the new section of overhead powerline and species travelling to Stodmarsh SPA/Ramsar.

7.4.52 The buried HVDC cable would traverse Thanet Coast and Sandwich Bay SPA/Ramsar for a distance of approximately 3 km. This includes traversing the saltmarsh and upper mudflat, and the intertidal mudflat that constitutes most of Pegwell Bay at low tide. The use of a trenchless crossing will not contain any provision for surface trenching through the saltmarsh of Thanet Coast & Sandwich Bay SPA/Ramsar or Sandwich Bay SAC and therefore, no AEoSI for the qualifying features of the Thanet Coast and Sandwich Bay SPA/Ramsar would arise through habitat loss.

7.4.53 The potential risk of frac out, where drilling fluids reach the surface due to fissures in the geology, while undertaking trenchless techniques beneath Pegwell Bay, has been considered. Mitigation measures being implemented to minimise and address risk of surface frac out or break out are contained in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC.** With mitigation in place This will ensure no AEoSI for the qualifying features of the Thanet Coast and Sandwich Bay SPA/Ramsar.

7.4.54 The HRA (**Application Document 6.6 HRA Report)** confirms that functionally-linked arable foraging land used by golden plover associated with Thanet Coast & Sandwich Bay SPA during early winter (October to December) would be lost permanently due to the Minster Converter Station and Substation. To offset this loss, mitigation land has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)** for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent**, **Figure 1 Minster Converter and Substation Outline Landscape Mitigation** within **Application Document 7.5.7.2**. Further detail on how this land was selected is included in section 7.4 of **Application Document 6.6 HRA Report.** The location and size of the land has been agreed with Natural England and the Kent Planning Authorities.

7.4.55 Detailed information on maintenance and monitoring of the mitigation land, including responsibilities is set out within **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan**. With this land included in the Kent Onshore Scheme and secured through the **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent**, it can be concluded that no AEoSI for the qualifying features of the Thanet Coast & Sandwich Bay SPA/Ramsar will arise due to loss of functionally-linked land for golden plover associated with the SPA/Ramsar.

7.4.56 As identified in the HRA screening, there is the potential for likely significant effects through collision of SPA birds with the new section of overhead powerline being installed to connect the Minster Converter Station and Substation to the existing Richborough to Canterbury overhead line. A collision risk assessment has been undertaken and reviewed by Natural England. It is presented in **Appendix C** of **Application Document 6.6 HRA Report.** The provision of bird deflectors will minimise any risk during adverse weather or low light conditions. These are secured in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC**. There are also numerous examples of powerlines crossing wetland sites that are nonetheless of national or international importance for birds. Moreover, the existing Richborough to

Canterbury overhead line runs through wet grassland west of the Proposed Project. It is therefore concluded that no AEoSI would occur on the qualifying features of either Thanet Coast & Sandwich Bay SPA or Stodmarsh SPA/Ramsar due to collisions with the new section of overhead line.

7.4.57 The Kent Onshore Scheme, with mitigation in place therefore, avoids significant adverse effects to international sites of biodiversity conservation in line in paragraph 5.4.4 of NPS EN-1.

7.4.58 There is a single SSSI within 5 km of the proposed Kent Onshore Scheme, which is also shown on **Application Document 6.4.3.2.A.5 Kent Designated Sites**. **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** considers the impact of the Kent Onshore Scheme on this SSSI. This is Sandwich Bay to Hacklinge Marshes SSSI; a very large SSSI, part of which is located approximately 20 m south of the proposed Minster Converter Station and Minster Substation. During construction and operation, there would be some tree height reduction within a 100m stretch of Management Unit 11 of the SSSI, to ensure no interference with the new section of overhead line. However, this would not result in any net loss of woodland habitat. Moreover, this section of woodland is extremely dense and overgrown and would ecologically benefit from some opening up. Since there would be no habitat loss, this is considered a negligible impact (not significant) on a receptor of national importance.

7.4.59 During site preparation, earthworks and foundation creation for the proposed Minster Converter Station and Substation, including associated piling, the 60 dB LAmax noise contour would at times extend up to 120 m into Management Unit 11. During other construction activities associated with the construction of the proposed Minster Converter Station and Substation, close-board fencing would keep noise levels in the SSSI below 60 dB LAmax. In addition, the establishment of the two pairs of new pylons (PC 54A, PC 54B, PC 53C and PC 53D) either side of the 1.5 ha SSSI strip along the railway line would elevate noise in that strip above 60dB LAmax even after incorporation of noise fencing. In order to minimize the area of SSSI subject to noise disturbance in any season, the site preparation, earthworks, and foundation creation for the Minster Converter Station and Substation, and the section of permanent access north of the SSSI are programmed to avoid the March to June period and thus avoid the nesting season. Given the temporary and thus reversible nature and the fact it would only last for 1-2 nesting seasons, this is considered to be a Minor adverse effect which is not significant.

7.4.60 Measures to reduce impacts to air quality and pollution (dust and water quality) are contained within **Application Document 7.5.3.1 Appendix A Outline CoCP.** In accordance, with Paragraph 5.4.7 of NPS EN-1, the Kent Onshore Scheme therefore avoids adverse effects on SSSI and therefore NPS EN-1 paragraph 5.4.8 is not engaged.

### Sites of regional and local biodiversity interest

7.4.61 The Princes Beachland LNR lies 1.7 km southeast of the Kent Onshore Scheme and is shown on **Application Document 6.4.3.2.A.5 Kent Designated Sites**. This is a site designated for a mosaic of habitats that have importance for migrating birds. There are four LWS within 2 km of the proposed Kent Onshore Scheme. The largest of these is Ash Level and South Richborough Pasture (site DO21), which overlaps with the proposed Kent Onshore Scheme particularly south of the River Stour, specifically where the new proposed OHL would connect into the existing 400 kV Canterbury to

Richborough OHL. Woods & Grassland, Minster Marshes (site TH12) partly includes the rail corridor which traverses the proposed Kent Onshore Scheme. Two other non-statutory sites are more distant from the proposed Kent Onshore Scheme. Sandwich & Pegwell Bay Kent Wildlife Trust Site is a 615ha mosaic of grassland, wetland and saltmarsh habitats. This designated site supports population of both lizard orchids and Deptford pink (*Dianthus armeria*) and is an important overwintering Site for wading bird species. It is located 470 m from the landfall. Site TH3 Pegwell Bay Infilled Dry Valley is located 1.1 km northeast of Kent Onshore Scheme.

7.4.62 The Minster Stream, ditches, scrapes, lowland mixed broadleaved woodland, hedgerows, grazing marsh, and area of saltmarsh are of Regional importance.

7.4.63 Embedded mitigation measures are set out in section 2.8 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.** Measures relevant to the control and management of impacts during construction, such as air quality, dust and pollution, have been included within **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**. The chapter concludes that no significant adverse effects to sites regional and local interest are predicted as a result of the Kent Onshore Scheme.

7.4.64 During construction of the new section of overhead line, and the connection of the new overhead line to the existing Richborough to Canterbury overhead line, there would be temporary loss of 5 ha of land (approximately 0.7 % of the LWS) from the Ash Level and South Richborough Pasture LWS due to works areas and the haul road necessary to reach the pylon construction areas. This loss, whilst temporary, would result in moderate adverse and therefore significant effects. It is proposed as part of the Kent Onshore Scheme to deliver a series of small shallow riverside scrapes with riparian planting, and some alder and willow planting, along the stretch of the River Stour within the Order Limits and (on the south side of the River Stour) within the LWS, before the end of construction. With this mitigation, this is considered a long-term minor beneficial effect which is not significant.

7.4.65 Small scale vegetation removal would be required within the Woods & Grassland, Minster Marshes LWS during construction. The impact will be limited and reversible and therefore will result in a minor adverse effect that is not significant. In accordance with paragraph 5.4.42 of NPS EN-1, the Proposed Project therefore avoids significant harm to sites of regional and local biodiversity interest.

### Ancient Woodland, veteran trees and important hedgerows

7.4.66 The design of the Proposed Project has been developed to avoid or minimise tree loss and impacts, especially to those trees with the greatest quality and value (ancient or veteran trees). The impacts of tree removals (non-veteran or ancient trees) will be compensated through the proposed tree planting and associated landscaping works which will represent an opportunity to enhance the quality, benefits and resilience of trees within the Order Limits. New tree planting is committed to in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent and Figure 1 Minster Converter** and **Substation Outline Landscape Mitigation within Application Document 7.5.7.2**. No veteran or ancient trees are to be removed, and this commitment is secured via the **Application Document 7.5.3 Outline Onshore CEMP.**

7.4.67 RPA incursions are required for one veteran and one ancient tree to facilitate monitoring and maintenance access. The existing ground conditions within the RPAs of these trees is understood to be a turfed area forming the edge of a fairway within St Augustine's

Golf Club. As such it is likely that this area is subject to infrequent pedestrian foot traffic and light weight vehicle movement. Therefore, infrequent use by pedestrian and all-terrain vehicles to facilitate monitoring and maintenance access is not considered likely to significantly change the current situation within the golf course and it is therefore considered unlikely that these operations will negatively impact the structure of the soil. In line with paragraph 5.4.3 of NPS EN-1, the Kent Onshore Scheme therefore avoids the loss or deterioration of irreplaceable habitats through suitable mitigation. No Important Hedgerows have been identified in the Kent Onshore Scheme boundary either using ecological or historical criteria.

7.4.68 No veteran or ancient trees are to be removed, and this commitment is secured via the **Application Document 7.5.3 Outline Onshore CEMP.**

### Protected Species and Other Habitats

7.4.69 Section 2.7 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** sets out the existing baseline conditions of the Kent Onshore Scheme including relevant protected species. The chapter concludes that no residual long-term significant adverse effects are predicted as a result of the construction and operation of the Proposed Project, in line with paragraph 5.4.14 and 5.4.15 of NPS EN-1.

7.4.70 There would be temporary loss of sections of ditch, hedgerow and woodland during construction which would result in moderate adverse impacts to habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes in the medium term. This loss would be temporary and reversible. There would be extensive habitat creation as part of the Proposed Project, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour (See **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent** for details). With this mitigation, moderate beneficial effects are predicted in the long-term for habitats, ornithology, badger, bats, reptiles, riparian mammals and terrestrial invertebrates.

7.4.71 Lighting during the construction phase could result in moderate adverse impacts to bats and fish. Around construction compounds, direct illumination of boundary features would be avoided. In addition, lighting would be designed to comply with published guidelines. With this mitigation in place, the effects would be reduced to negligible and not significant.

7.4.72 There would be a permanent loss of existing woody habitat for bat foraging, due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation footprint. To mitigate this impact, larger gaps in hedgerows/woodland belts would be reduced to 10 m maximum during the night by hurdles or similar. With mitigation in place, the effect is reduced to minor adverse and not significant.

7.4.73 There would be some limited loss of habitat for macroinvertebrates at locations of the 24 temporary culverts located on the ditch network south of the River Stour and ditches around the proposed construction compounds K01 and K02, and permanent access route on Minster Stream (see **Application Document 6.4.1.4.4 Watercourse crossings** and **Application Document 6.3.1.4.A Appendix 1.4.A Crossings Schedules**).With embedded mitigation and a culvert design that preserves the natural bed of the ditch or consists of a box culvert where the invert of the culvert is sunk below the bed level of the water course and natural / existing bed material placed across the inside of the culvert to lift the level up to meet that of the existing, then any potential

impacts on macroinvertebrate populations would be minimal, resulting in an overall minor adverse effect that is not significant. The Kent Onshore Scheme will deliver some habitat improvements in the form of a series of wetland scrapes along the River Stour within the Order Limits, part of which lies within the Lower Stour Wetlands Biodiversity Opportunity Area and therefore will comply with Policy SP31 of the TLP.

## Appraisal Summary

7.4.74 The Proposed Project avoids and/ or mitigates all significant long-term adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**

7.4.75 In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity. The proposed planting design (as outlined in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent**) includes habitat creation, including balancing ponds around the Saxmundham Converter Station and Friston Substation (for the scenario where the substation is built as part of the Proposed Project) and balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.

7.4.76 **Application Document 6.6 HRA Report** concludes that, with mitigation, there are no likely significant effects as a result of the Proposed Project (alone or in-combination) on internationally designated sites. Mitigation has included the provision of mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA within the Order Limits. This mitigation is secured through the **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC – Suffolk** and the **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent**.

7.4.77 National Grid is also committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to consider how to deliver this. It is also noted that there is no mandatory requirement for 10% net gain for NSIPs.

7.4.78 Given the above, consideration of the prescribed matters set out in Regulation 7 of the Decision Regulations (discussed in Section 2 of this Planning Statement) does not materially alter the planning balance for the Proposed Project.

7.4.79 In summary, the Proposed Project is in accordance with NPS EN-1, NPS EN-5 and local planning policy relating to the protection of ecological sites and features. The Proposed Project is also committed to delivering ecological enhancements and net gain in accordance with Policy NE1 of the DDLP and SCLP10.1 of the East Suffolk Council Local Plan.

# 7.5 Cultural Heritage

## Planning Policy Context and Legislative Context

### Relevant Legislation

7.5.1 Legislation relevant to cultural heritage includes the following:

- The Ancient Monuments and Archaeological Areas Act 1979 (The Ancient Monuments and Archaeological Areas Act 1979, 2024);
- The Planning (Listed Buildings and Conservation Areas) Act 1990 (Planning (Listed Buildings and Conservation Areas) Act 1990, 2024); and
- The Hedgerows Regulations 1997 (The Hedgerows Regulations, 1997).

### National Planning Policy

7.5.2 As stated in NPS EN-1 (DESNZ, 2024) paragraph 5.9.1 "*The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground*".

7.5.3 Paragraph 5.9.3 of NPS EN-1 sets out the different types of heritage assets and states *"the sum of the heritage interests that a heritage asset holds is referred to as its significance*", this also includes the setting within which the heritage asset is located. Paragraph 5.9.4 outlines the different types of designated heritage assets, which are those with "*a level of significance that justifies official designation*", while paragraph 5.9.5 sets out that heritage assets may not currently be designated but are "*demonstrated to be of equivalent significant to designated heritage assets of the highest significance*". These non-designated heritage assets are required to be considered subject to the policies for those that are designated. Paragraph 5.9.7 of NPS EN-1 requires the SoS to consider the impacts of development on other non-designated heritage assets.

7.5.4 NPS EN-1 paragraph 5.9.9 requires the applicant to "*undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES*". Paragraph 5.9.10 of NPS EN-1 sets out that the ES should describe the significance of heritage assets and their setting, and paragraph 5.9.11 of NPS EN-1 states that this should include a desk based assessment and, where necessary, field evaluation. The level of detail should be proportionate to the importance of the heritage assets. Paragraph 5.9.12 requires that applications contain sufficient information to enable the extent of impacts on the significance of any heritage assets to be understood.

7.5.5 Paragraph 5.9.17 of NPS EN-1 states "*Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part)*", this should be proportionate to the asset's significance and the impact to the asset.

7.5.6 NPS EN-1 paragraph 5.9.23 makes reference to the SoS needing to comply with regulation 3 of the Decision Regulations which are discussed in Section 2 of this Planning Statement.

7.5.7 NPS EN-1 paragraph 5.9.27 states that "*When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance*".

7.5.8 NPS EN-1 paragraph 5.9.28 states "*any harm or loss of significance affecting any designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification*".

7.5.9 Regarding decision making, in cases where substantial harm to a heritage asset would result, NPS EN-1 paragraph 5.9.31 explains that: "*Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss*".

7.5.10 In cases where harm is less than substantial, NPS EN-1 paragraph 5.9.32 establishes a lower threshold for the need to demonstrate that the benefits of the Proposed Development outweigh impacts on a designated heritage asset, stating that "*where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal…".*

7.5.11 Paragraph 5.9.33 of NPS EN-1 states that "*in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

7.5.12 Paragraph 4.2.16 NPS EN-1 discusses how the SoS will consider the balance of benefits and impacts in relation to CNP infrastructure (such as the Proposed Development) where the NPS (or any other planning policy) requires an outweighing of harm. This states that where residual impacts remain after the mitigation hierarchy has been applied, in all but the most exceptional circumstances the residual impacts will be outweighed by the urgent need for CNP infrastructure, and therefore "…*the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances*".

7.5.13 Paragraph 4.2.17 follows this by providing a non-exhaustive list of policy tests that the SoS will consider the need case for CNP infrastructure satisfies. This includes the requirement for the substantial public benefits of a project to outweigh substantial harm or loss of a heritage asset. It states that: *"…the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests…where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional*".

7.5.14 Given that the need case for, and public benefits of, CNP infrastructure is sufficient to outweigh substantial harm to a heritage asset, and noting that the list of policy tests in NPS EN-1 paragraph 4.2.17 is not exhaustive, it can be inferred that the need case for, and public benefits of, CNP infrastructure will also (and to an even greater degree) outweigh impacts on the significance of a heritage asset that amount to less than substantial harm.

7.5.15 Like NPS EN-1 (DESNZ, 2024), the NPPF (Department of Levelling Up, Housing and Communities, 2024) requires an assessment of harm to the significance of heritage assets affected by a proposed scheme. Both NPS EN-1 and NPPF categorise the level of harm into 'substantial' and 'less than substantial'.

7.5.16 The NPPG (Ministry of Housing, Communities and Local Government, 2016), which supports the NPPF, and the NPS provides further narrative on the interpretation of harm including the evaluation of significance.

### Local Planning Policy

7.5.17 Within the Suffolk Council area, SCLP Policy SCLP11.3 (Historic Environment) (East Suffolk Council, 2020) states the Council will collaborate to conserve and enhance the historic environment, applying National Planning Policy Framework guidelines to heritage assets, requiring Heritage Impact Assessments and/or Archaeological Assessments for developments affecting these assets, and encouraging pre-application consultations to ensure assessments are adequate. SCLP Policy SCLP11.7 (Archaeology) requires planning applications affecting known or suspected archaeological sites must include an assessment to ensure preservation of significant remains, with preference for in situ preservation; if not feasible, recording and analysis of the remains is required, and archaeological conditions or obligations will be applied as necessary.

7.5.18 Within the Kent Council area, TLP Policy SP36 (Conservation and Enhancement of Thanet's Historic Environment) (Thanet District Council, 2020) mandates that new developments must protect and enhance Thanet's historic environment, integrating heritage assets into proposals while ensuring their long-term conservation. TLP Policy HE01 (Archaeology) ensures that archaeological sites are adequately assessed and protected, with necessary measures taken to record and preserve their findings during development. TLP Policy HE03 (Heritage Assets) requires that proposals that affect both designated and non-designated heritage assets, will be assessed by reference to the scale of harm, both direct and indirect, or loss to, the significance of the heritage asset in accordance with the criteria in the NPPF.

## Assessment conclusions - Suffolk Onshore Scheme

7.5.19 **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** presents the assessment of the likely significant cultural heritage effects that could result from the Suffolk Onshore Scheme. This includes a description of the significance of the heritage assets and the contribution of their setting to their significance.

### Designated Heritage Assets

7.5.20 There are no designated heritage assets located within the Order Limits and there would be no physical impacts on designated assets resulting from the construction of the Suffolk Onshore Scheme. As stated in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage,** during construction, there is low potential for significant adverse effects to arise from temporary changes to the setting of designated heritage assets due to the temporary and reversible nature of the impact. Therefore, the assessment focusses on the operational impacts.

7.5.21 Once operational, the underground components of the Proposed Project, such as cables, would not result in any changes to the setting of heritage assets.

7.5.22 Designated assets within 2 km of the proposed above ground infrastructure have been reviewed in combination with the Zone of Theoretical Visibility (ZTV) data produced for the Proposed Project (**Application Document 6.4.2.3.6 Designated Assets within the wider 2km study area adopted for setting impacts - Suffolk**). Only a limited number of designated assets within the 2 km Study Area used for the assessment were identified as having a potential to experience change, as the majority of assets fall outside of the ZTV and/ or the land within the Order Limits does not contribute to their setting. These are discussed further below.

7.5.23 The Grade II listed Wood Farmhouse is located adjacent to the Order Limits in the area of Saxmundham Converter Station. It is recognised that while the farmhouse remains a Grade II listed structure on the National Heritage List for England, Listed Building Consent (DC/23/3457/LBC) has been granted by East Suffolk Council to demolish the structure following significant fire damage in April 2023. As a Grade II listed building it is considered to be of medium value, with its heritage value deriving from its architectural and historical interests. The proximity of the Saxmundham Converter Station would constitute new built form into the functional setting of the farmhouse. This would not affect the ability to appreciate the associative relationship between the farmhouse and the agricultural landscape but would introduce a prominent industrial feature into the farmhouse's visual setting that would be incongruous with its agricultural character. This impact would result in a noticeably different setting and would therefore constitute a medium impact, resulting in a moderate adverse effect, which is significant (at Year 1 of operation).

7.5.24 The majority of the designated assets affected by the Suffolk Onshore Scheme are located within the settlement of Saxmundham, designated as a Conservation Area and located west of the Order Limits for the Suffolk Onshore Scheme. As a Conservation Area containing a number of Grade II* listed buildings, including the Church of St John the Baptist, the settlement and its associated assets are considered to be of high value. The value largely derives from the architectural and historic interest. The majority of assets within the Conservation Area are screened from the Saxmundham Converter Station by the topography as well as the intervening built environment. However, visualisations which illustrate the level of visual change when approaching from the south (**Application Document 6.4.2.1.10-B Representative Viewpoint 2**) confirm that Saxmundham Converter Station and the permanent access over the Rover Fromus would be visible. This would not result in change to the heritage value of the Conservation Area, but it would constitute change to a viewpoint of historical importance that contributes to the sense of arrival to the Conservation Area. Recognising that the change is to the experience of a view and not to the heritage value of the Conservation Area, the impact is assessed to be small resulting in a moderate adverse effect, which is significant (at Year 1 of operation).

7.5.25 The Grade II listed Hurts Hall is located on the southern edge of Saxmundham, and approximately 185 m north of the Order Limits. As a Grade II listed building, Hurts Hall is considered to be of medium value, and this value largely stems from its architectural interest, and also historic interest for the role the hall estate played in the development of Saxmundham. The proposed Saxmundham Converter Station is unlikely to be perceptible in views from the gardens of Hurts Hall, and this is demonstrated by **Application Document 6.4.2.3.8-B Representative Viewpoint Visualisations** which shows that Saxmundham Converter Station would be screened by existing vegetation and would not result in change to the visual setting and experience from this location. The experience of views of Hurts Hall within its relict parkland from the B1121, which is identified as an important view in Saxmundham Neighbourhood Plan, has the potential to change as a result of the presence of Saxmundham Converter Station and the

permanent bridge access over the River Fromus. Embedded landscape mitigation will introduce native hedgerow and tree planting around the Converter Station and plantation along the route of the River Fromus that would partially screen views of the Converter Station and the new permanent bridge over the River Fromus. **Application Document 6.4.2.1.10-B Representative Viewpoint 2** demonstrates that at year 1 operation the presence of the permanent crossing (2 m and 4 m clearance) over the River Fromus would constitute a noticeable change in the foreground of the view. Combined with the presence of Saxmundham Converter Station in the background of the view, this would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated parkland, and would be incongruous with the rural setting that contributes to its heritage value. This would constitute a medium impact on an asset of medium value, resulting in a moderate adverse effect, which is significant (at Year 1 of operation).

7.5.26 With regard to the three designated heritage assets discussed above, additional mitigation measures detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** will reduce the visual impacts of the infrastructure and reduce the level of visual change to their settings. Once the planting/screening proposed to limit views of the Converter Station and River Fromus crossing has achieved its full height, the residual effect on Wood Farm Grade II listed building, the Saxmundham Conservation Area and Hurts Hall Grade II listed building, at year 15 of operation of the Suffolk Onshore Scheme, is assessed to be minor adverse (not significant). **Application Document 6.4.2.3.8-A Representative Viewpoint Visualisations** and **Application Document 6.4.101.10-B Representative Viewpoint 2** illustrate the visual impact of Saxmundham Converter Station on Wood Farm, the Saxmundham Conservation Area and Hurts Hall, at year 15 of operation (summer).

7.5.27 The assessment has concluded that there would be no impact on Hill Farm Grade II listed building and therefore no effect as the Saxmundham Converter Station once completed, would not be perceptible in views from the farmhouse, and would not introduce change to the experience and setting of the farmhouse, and no change to its heritage value.

### Non-Designated Heritage Assets

7.5.28 There are 97 non-designated heritage assets, or groupings of assets, within the Order Limits which could be physically impacted by the construction of the Suffolk Onshore Scheme resulting in permanent effects. Significant adverse effects are anticipated at the following non-designated heritage assets through the loss of assets during construction:

- Gorse Hill Multi-Period Complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065) and Second World War Anti-Diver Site (ADB067, ADB068)
- Possible Enclosure Northeast of Hill Farm (SNF038)
- Enclosures, trackways and possible structures at Saxmundham Converter Station Site (SXM085; SNF033; SNF039)
- Possible ring-ditch at Saxmundham Converter Station South (SNF034)

7.5.29 Potential direct impacts on buried archaeological remains would be managed through a programme of mitigation which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. The guiding principles and methodology for the planning and implementation of the archaeological mitigation are set out in the

**Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation** which is to be agreed with the Archaeology Advisor at Suffolk County Council, this is secured through Requirement 14 of Schedule 3 of the DCO (**Application Document 3.1**).

7.5.30 **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation** includes a requirement for site-specific WSI to be produced by the Applicant's Archaeological Contractor to achieve the mitigation measures. The site-specific WSI would be agreed with the Archaeology Advisor for Suffolk County Council and any other relevant heritage stakeholders prior to the commencement of the archaeological works.

7.5.31 Archaeological mitigation works would focus primarily on the areas of buried archaeological remains identified and characterised during the geophysical survey and archaeological trial trenching undertaken for the Proposed Project. With mitigation in place, no significant residual adverse effects to non-designated heritage assets are predicted.

## Assessment of Harm

7.5.32 A Heritage Statement (**Appendix D of this Planning Statement**) has been prepared which sets out the harm predicted upon designated heritage assets and non-designated heritage assets. The purpose of the Heritage Statement is to assess, in accordance with national policy and guidance, whether the Proposed Project would result in substantial harm to heritage assets. The statement focuses on terrestrial designated heritage assets, and on non-designated terrestrial heritage assets where the EIA has identified a level of impact that might result in substantial harm (Medium or large impacts). It is noted that other assets have been identified in the EIA as likely to experience small or negligible impacts which would result in less than substantial harm at the lower end of the spectrum however these are not discussed further in the Heritage Statement.

7.5.33 The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated or non-designated assets. The Heritage Statement concludes that for the following assets, the significant adverse effects can be reasonably equated with less than substantial harm, at the lower end of the spectrum, for the following reasons:

### Designated Heritage Assets

- **Wood Farmhouse Grade II listed building (NHLE 1231179)**- The change to the functional setting of the farmhouse would not affect the farmhouse's architectural and historical interests and would not result in its heritage significance being altered or lost; and
- **Hurts Hall Grade II Listed Building and associated non-designated parkland (NHLE1268178; SXM017; SXM077) -** The change would not affect the hall's domestic setting and would not affect the hall's architectural or historical interests, including its historical association with the development of Saxmundham, and the associative relationship between the house and the lands that, historically, were within its influence.

### Non-designated Heritage Assets

- **Gorse Hill Multi-Period Complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065)** – the partial loss of this asset would not affect the most sensitive areas and would not result in total loss of, or substantial change to, the asset's heritage significance.
- Possible Enclosure Northeast of Hill Farm SNF038- the entire feature would not be lost and would be mitigated by measures set out in **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation**,
- **Saxmundham Converter Station site (SXM085; SNF033; SNF039)** – the partial loss of this asset would not affect the most sensitive parts of the complex that hold the features with the greatest levels of archaeological interest and heritage significance.
- **Saxmundham Converter Station South Ring Ditch (SNF034)**—the loss of this asset would be mitigated by measures set out in **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation**.

## Assessment conclusions - Kent Onshore Scheme

7.5.34 **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** presents the assessment of the likely significant cultural heritage effects that could result from the Kent Onshore Scheme. This includes a description of the significance of the heritage assets and the contribution of their setting to their significance.

### Designated Heritage Assets

7.5.35 There are no designated heritage assets located within the Order Limits. As stated in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**, during construction, there is low potential for significant effects to arise from temporary changes to the setting of designated heritage assets due to the temporary and reversible nature of the impact. Therefore, the assessment focusses on the operational impacts.

7.5.36 Once operational, the underground components of the Proposed Project, such as cables, would not result in any changes to the setting of heritage assets.

7.5.37 The only designated heritage asset considered within the assessment is Richborough Saxon Shore Fort Scheduled Monument and Grade I listed buildings (NHLE1014642/NHLE1363256). Richborough Saxon Shore Fort stands in an elevated position on the south side of an area formally occupied by the Wantsum Channel. The value of this asset derives from its archaeological interest, and the information it could provide relating to the history and development of the Roman military in the area, as well as the associated civilian settlement. It also has some architectural value from the above ground remains that survive. As a scheduled monument it is considered to be of high value.

7.5.38 While the Minster Substation and Minster Converter Station would represent new elements in the landscape to the north and northwest of the fort, these would be limited to a small element of the vista as is demonstrated by the year 1 operation visualisations in **Application Document 6.4.3.3.8-A** (view to the north) and **Application Document 6.4.3.3.8-B** (view to the north-west)**.**

7.5.39 This would be further reduced because of the distance between the Minster Substation and Minster Converter Station and the fort. Furthermore, the alterations to the overhead lines and the new pylons required to accommodate the new overhead connection would not result in a significant change to the existing wirescape of the Minster Marshes when viewed from the fort. Finally, as the above ground infrastructure is located to the north and northwest, while the Ebbsfleet enclosure is located to the north-northeast, the Kent Onshore Scheme would not sever any views that that may have existed, or been significant, between the fort and the large enclosure on the Ebbsfleet Peninsula. The assessment concludes the magnitude of impact is negligible and therefore on an asset of high value this would result in a minor adverse effect which is not significant.

### Non-Designated Heritage Assets

7.5.40 There are 13 non-designated heritage assets, or groupings of assets, within the Order Limits which could be physically impacted by the construction of the Kent Onshore Scheme, resulting in permanent effects.

7.5.41 The assessment identifies impacts on the non-designated Ebbsfleet Peninsula Complex comprises buried, non-designated, multi-period and multi-phase settlement archaeology. This is of potential national importance and which is of equivalent significance to a scheduled monument. The Kent Onshore Scheme has been designed to avoid physical impacts to the most sensitive areas of archaeological remains, and therefore the areas of greatest heritage significance. Some components of the Kent Onshore Scheme would permanently impact buried remains that are present on the fringes of the complex, resulting in the permanent loss of archaeological interest to a proportion of the asset as a whole.

7.5.42 The Kent Onshore Scheme would therefore result in direct physical impacts on parts of the complex, although as they have been designed so that the best preserved and most sensitive remains (i.e. the main Late Iron Age/Early Roman enclosure and known Bronze Age and Roman burials) would be avoided, they would not totally affect the ability to understand the heritage interests of the assets. Furthermore, the physical impacts will be limited to a relatively small percentage of the complex, as it is currently understood. Therefore, this would result in a major adverse effect which is considered to be significant.

7.5.43 No significant adverse effects are anticipated as a result of the Kent Onshore Scheme on the remaining non-designated heritage assets, except the non-designated Circular Feature (AECOMK007) located to the south of the Sandwich Road junction. Construction works for the Kent Onshore Scheme would potentially result in the total loss of this asset of negligible value. This large impact would result in a moderate effect, which is considered to be significant.

7.5.44 Additional mitigation measures detailed in **Application Document 7.5.4.2 Kent Outline Onshore Overarching Written Scheme of Investigation,** and in Section 3.10 of the **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**, will be implemented to either protect, and preserve the remains *in situ*, or to excavate the remains and record them archaeologically. The successful completion of the additional mitigation will reduce the effect to minor adverse (not significant) for both Ebbsfleet Peninsula Complex and Circular feather AECOMK007.

7.5.45 Although its effect is assessed as not significant for all three assets, an impact of large magnitude during construction is also predicted on the following non-designated heritage assets of low or negligible value, primarily due to the potential for complete removal and total loss of these assets:

- Non-designated former sheep dip (AECOMK002)
- Non-designated bridge and former sheep dip (AECOMK006).
- Non-designated former pillbox (TR 36 SE 465).

7.5.46 Where effects are predicted, these would be managed through a programme of additional mitigation, as described above in the Suffolk Onshore Assessment Conclusions Section and detailed within **Application Document 7.5.4.2 Kent Outline Onshore Overarching Written Scheme of Investigation Kent Onshore**.

7.5.47 These assets are discussed in Section A.4 (Statement of Significance) of the Heritage Statement. However, were not taken forward to the harm assessment (presented in Appendix E of this Planning Statement) for the following reasons.

7.5.48 Evidence provided by fieldwork surveys suggest that any archaeological interest for historical landscape features AECOMK002, AECOMK006 and circular feature AECOMK007 are no longer present and, as such, the features have no heritage significance.

7.5.49 The former Pillbox (TR 36 SE 465) was not taken forward in the harm assessment (Appendix E of this Planning Statement) as **Application Document 6.2.3.3 Part 3 Kent Cultural Heritage** adopted a worst-case scenario that foundation remains may survive and that construction of the Kent Onshore Scheme may therefore result in the total loss of foundation remains. Foundation remains would be of negligible archaeological interest and it is assessed they would therefore be of negligible heritage significance.

### Assessment of Harm

7.5.50 As discussed in the Suffolk Onshore Scheme section above, a Heritage Statement (**Appendix D of this Planning Statement**) has been prepared which sets out the harm predicted upon designated heritage assets and non-designated heritage assets where the EIA identified a level of impact that might result in substantial harm (medium or large impacts). It is noted that other assets have been identified in the EIA as likely to experience a low and very impact which would result in less than substantial harm at the lower end of the spectrum however these are not discussed further in the Heritage Statement.

7.5.51 The Heritage Statement concludes that for the following asset the significant adverse effect likely upon this asset (which is identified in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage)** can be reasonably equated with less than substantial harm, at the lower end of the spectrum, for the following reason:

- **Non- designated Ebbsfleet Peninsula Complex, multi-period settlement archaeology but of schedulable quality**- The Kent Onshore Scheme has been designed to avoid physical impacts to the most sensitive areas of archaeological remains, and therefore the areas of greatest heritage significance. As the asset's heritage significance derives from the archaeological interest of the collective remains, the loss of a part of this interest would not amount to total loss or substantial harm.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.5.52 National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork

analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on designated and non-designated heritage assets.

7.5.53 As set out in Section 3.8 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 2 Kent Chapter 3 Cultural Heritage** mitigation measures that have been incorporated into the Proposed Project design include:

- The construction of the Proposed Project would employ the use of track matting for construction plant, where practicable, as opposed to topsoil stripping for the creation of haul roads. This measure would avoid permanent impacts to buried archaeological remains that may be present.
- To minimise change to the setting of heritage assets, land used temporarily will be reinstated where practicable to its pre-construction condition and use, unless agreed otherwise.
- To minimise light intrusion into the setting of heritage assets, construction lighting will be of the lowest levels necessary to safely perform each task.

7.5.54 These measures are set out in **Application Document 7.5.3.1 Outline Onshore CEMP, Appendix A Outline CoCP.** In addition to the above, further mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent Onshore oWSI and Application Document 7.5.4.1 Suffolk Onshore oWSI** and include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. With this mitigation in place, no significant residual effects are predicted.

7.5.55 The Heritage Statement (Appendix E of this Planning Statement) concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to three designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality.

7.5.56 In accordance with the NPS EN-1 paragraphs 5.9.32 and 5.9.33, and taking into account of the principles set out in NPS EN-1 paragraphs 4.2.16 and 4.2.17, the NPPF and NPPG, the substantial public benefits and need for the Proposed Project, as set out in Section 5 of this Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the lower end of the spectrum, to the designated heritage assets and the non-designated heritage asset of schedulable quality. The less than substantial harm upon non designated heritage assets affected by the Suffolk Onshore Scheme is also clearly outweighed by the substantial public benefits and need for the Proposed Project providing the judgement required under paragraph 5.9.33 of NPS EN-1.

7.5.57 Given the above, consideration of the prescribed matters set out in Regulation 3 of the Decision Regulations (discussed in Section 2 of this Planning Statement) does not alter the planning balance for the Proposed Project.

7.5.58 Overall, the Proposed Project has followed the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable, and the public benefits of the

Proposed Project outweigh the less than substantial harm identified, in line with national policy and regulations as well as with relevant local policies.

## 7.6 Flood Risk and Drainage

### Planning Policy Context

#### Flood risk to and from development and drainage

7.6.1 NPS EN-1 Paragraph 5.8.7 (DESNZ, 2024) states that "*Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood."*

7.6.2 Paragraph 5.8.12 of NPS EN-1 (DESNZ, 2024) requires development to *"be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development".*

7.6.3 NPS EN-1 at paragraph 5.8.36 (DESNZ, 2024) expects applicants to demonstrate to the satisfaction of the SoS that "*in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere*". It also expects the project to include safe access and escape routes where required. Paragraph 5.8.17 of NPS EN-1 (DESNZ, 2024) requires developments including their construction works to account for "*any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features*" to ensure access is retained and their standard of protection is not reduced.

7.6.4 NPS EN-1 paragraph 5.8.41 states that that essential energy infrastructure within flood zone 3b "*should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.*"

7.6.5 NPS EN-5 reiterates the requirements set out in NPS EN-1, detailed above. Paragraph 2.3.2 of NPS EN-5 states that the resilience of projects to climate change should be assessed and the policy states that an FRA should be prepared. The NPPF's Planning Practice Guidance (NPPG) flood risk and coastal change section should also be considered with respect to the preparation of the FRA.

#### Sequential Test

7.6.6 The application of the Sequential Test is set out in Paragraph 5.8.21 of NPS EN-1 which explains that the Sequential Test ensures that "*a sequential and risk based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account*" (Paragraph 5.8.21). It continues that where it is not possible to use low risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas. Paragraph 5.8.23 (DESNZ, 2024), expects the consideration of alternative sites to be undertaken with reference to Section 4.2 of NPS EN-1 ( (DESNZ, 2024), which, amongst other things, requires the consideration of alternatives to be undertaken in a

proportionate manner and only consider those alternatives which can meet the objectives of a project.

7.6.7 Paragraph 5.8.16 of NPS EN-1 (Ref 2) notes that further guidance on flood risk can be found in the NPPF. The NPPF contains similar flood risk policies to NPS EN-1 at paragraph 175 explains that "*the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)*".

7.6.8 NPS EN-1 at paragraph 5.8.21 has a footnote (225) referencing the NPPG's flood risk and coastal change section (paragraph 023 Reference ID: 7-023-20220825 to paragraph: 030 Reference ID: 7-030-20220825) to provide guidance as to how the sequential test should be applied. The NPPG outlines that the sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. It emphasises that all forms of flood risk (including surface water flooding) need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability. Therefore, the Sequential Test should be applied across all areas of flood risk

7.6.9 Paragraph 5.8.29 of NPS EN-1 states "*The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding".*

7.6.10 Policy CC01 of the Thanet Local Plan, Policy SCLP9.5 of the Suffolk Coastal Local Plan and Policy CC5 of the Dover District Local Plan reiterate that development in an area identified as being at risk of flooding and falling within Flood Zones 2 and 3, will only be permitted if it can be demonstrated that it satisfies the Sequential Test and, where required, the Exception Test as set out in the NPPF.

### Exception Test

7.6.11 Paragraph 5.8.9 of NPS EN-1 (DESNZ, 2024) introduces the Exception Test, stating *"If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied".* This paragraph contains a footnote (214) referencing the NPPG flood risk section (paragraph 031 Reference ID 7- 031-20220825) providing guidance on what the Exception Test consists of, and how it is intended to be applied.

7.6.12 The NPPF reiterates the above guidance in relation to the Exception Test. Annex 3 of the NPPF identifies essential utility infrastructure such as electricity distribution systems as 'essential infrastructure'. Table 2: Flood risk vulnerability and flood zone 'incompatibility' of the NPPG (paragraph 079, Reference ID: 7-079-20220825) sets out that where essential infrastructure is located within Flood Zone 3a or 3b, and the sequential test has not been passed, an Exception Test is required.

7.6.13 NPS EN-1 Paragraph 5.8.11 states that "*Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that:*

- the project would provide wider sustainability benefits to the community that outweigh flood risk; and

- the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall."

## Drainage

7.6.14 With regard to drainage, paragraph 5.8.15 of NPS EN-1 introduces the need for a FRA to include details of how surface water will be impacted by development, and how the development will manage the discharge of surface water, including how the hierarchy of drainage mitigation and management has been followed. It also requires a FRA to explain and justify why the types of SuDS and methods of discharge have been selected. Paragraph 5.8.15 of NPS EN-1 also contains a footnote referencing the NPPF's Planning Practice Guidance (NPPG) flood risk section (paragraph 055 Reference ID 7-055-20220825), which explains the use and importance of SuDS, reiterating that they provide benefits for water quantity, water quality, biodiversity and amenity. The NPPG also refers to available technical standards to help guide decisions about the design, maintenance and operation of sustainable drainage systems.

7.6.15 NPS EN-1 paragraph 5.8.25 explains the range of sustainable approaches to surface water drainage management. Paragraph 5.8.26 requires the site layout and surface water drainage systems to be able to "*cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts*". The predicted impacts of climate change should be accounted for in surface water drainage arrangements, as required by paragraph 5.8.27 of NPS EN-1. Paragraph 5.8.28 of NPS EN-1 states it "*may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation".*

7.6.16 Policy SCLP9.6 of the SCLP, Policy CC02 of the TLP and Policy CC6 of the DCLP set out that Sustainable urban drainage systems should be used and integrated with the landscaping scheme and design of the development. Policy CC6 of the Dover District Council Local Plan adds that proposals must follow the following hierarchy of methods for discharge:

*i Into the ground, infiltration: the preferred method for discharging surface water runoff*

*ii To a surface water body, subject to appropriate pollution control measures*

*iii To a surface water sewer, highway drain or another drainage system*

*iv To a combined sewer.*

## Decision making

7.6.17 In terms of decision making, paragraph 5.8.36 of NPS EN-1 directs applicants to demonstrate to the SoS that the application is supported by an appropriate FRA, the Sequential Test has been applied and satisfied as part of site selection, and a sequential approach has been applied at the site level. It also requires proposals to be in line with any relevant national and local flood risk management strategy.

7.6.18 Paragraph 5.8.36 of NPS EN-1 also states that the SoS should be satisfied that SuDS have been designed into the project or provide clear evidence that their use would be inappropriate should they not be used, and that the project is designed to remain safe and operational during its lifetime, without increasing flood risk elsewhere. NPS EN-1

paragraph 5.8.41 adds that essential infrastructure within flood zone 3b "*should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows".*

## Assessment conclusions

7.6.19 **Application Document 6.8 Flood Risk Assessment** (FRA) assesses flood risk from rivers and the sea, surface water and groundwater sources to and from the Proposed Project. Flooding from other sources such as sewers and water mains, reservoirs and other artificial sources were scoped out of the FRA following engagement with the flood risk management authorities (Environment Agency, Suffolk County Council, East Suffolk Council, Kent County Council, Thanet District Council and Dover District Council).

7.6.20 The FRA describes how the risk of flooding has been avoided when situating vulnerable infrastructure, and for other less vulnerable components, how flood risk would be managed through appropriate design, and the control and management measures that are proposed to reduce any potential residual impacts associated with the Proposed Project which are secured via **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC.**

7.6.21 The FRA confirms that the Proposed Project, including proposed temporary construction compounds, are largely located within Environment Agency fluvial/tidal Flood Zone 1 (low risk) and with some localised areas of the Suffolk Onshore Scheme and Kent Onshore Scheme falling within Environment Agency fluvial/tidal Flood Zone 3, as shown in Figures 1 and 3 at **Appendix F** of this Planning Statement. The parts of the Proposed Project which are in Flood Zone 3 include the landfall and parts of the underground HVDC cabling for Suffolk Onshore Scheme and Kent Onshore Scheme. For the Suffolk Onshore Scheme hydraulic modelling of the River Fromus watercourse crossing has been carried out, details of which are outlined in Appendix B of **Application Document 6.8 Flood Risk Assessment**. The underground HVDC cable route linking Suffolk Onshore Scheme to the Offshore Scheme crosses the functional floodplain of the Hundred River and is therefore at high risk of fluvial/tidal flooding. A trenchless crossing of Flood Zone 3 is proposed for the underground cable installation, which avoids effects on the River Hundred during construction as secured by W12 in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC.** The underground HVDC cable route linking Kent Onshore Scheme to the Offshore Scheme crosses the functional floodplain of the River Stour and Stonelees Stream and is therefore at high risk of fluvial/tidal flooding. A trenchless crossing of Flood Zone 3 is proposed for the underground cable installation, which avoids effects on the River Stour and Stonelees Stream during construction and measures would be put in place during the installation to ensure the integrity of existing flood defences as secured by W12 in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC**.

7.6.22 The majority of the land within the Order Limits for the Suffolk and Kent Onshore Schemes is at 'very low' risk of flooding from surface water. However, there are localised areas at higher risk in the vicinity of the proposed watercourse crossings, ranging from low to high risk. An outline Surface Water Drainage Strategy is provided at Appendix C of **Application Document 6.8 Flood Risk Assessment** which aims to replicate as closely as possible the natural runoff characteristics of the existing land, intercepting all flows from the permanent works and temporary works into attenuation ponds prior to discharging into the nearest watercourse and utilising infiltration drainage systems where ground conditions are suitable.

7.6.23 The assessment of flood risk from groundwater is supported by the Groundwater Assessment presented in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Suffolk Kent Chapter 5 Geology and Hydrogeology.** The FRA concludes the Proposed Project is at low risk of groundwater flooding, and both operation of the Proposed Project and construction activities would have no increased impact on this source of flooding.

7.6.24 As per good practice measure W11 in **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**, where new permanent impermeable areas are created, drainage would be designed in accordance with the requirements of policy and guidance requirements of the relevant Lead Local Flood Authorities and will include allowances for climate change in accordance with current (May 2022) Environment Agency requirements.

7.6.25 Overall, with control and management measures as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** and secured via management plans under Requirement 6, Schedule 3 of **Application Document 3.1 draft DCO,** the residual risk of flooding during the construction phase has been assessed as low risk for all sources. During operation, flood risk from rivers and the sea, surface water and groundwater sources is also assessed to be low due to locating key infrastructure (the converter stations and substations) in Flood Zone 1, proposed watercourse crossing designs and implementing permanent surface water drainage solutions, based on use of Sustainable Drainage Systems (SuDS) to be maintained for the lifetime of the Proposed Project and embedding climate change resilience into the Proposed Project's design. Flood risk to neighbouring land from the Proposed Project would not be increased.

### Sequential Test

7.6.26 In terms of application of the Sequential Test, the identification and appraisal of routeing and siting options for the Proposed Project took into account environmental and socio-economic factors as well as technical and engineering design considerations and cost. This included consideration of flood risk. This is explained in **Application Document 7.3 Design Development Report** which summarises the key design decisions from the historical reports detailing options appraisal and **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** which provides an overview of the main alternatives considered**.** The routeing and siting options process resulted in the majority of the Order Limits for the Suffolk Onshore Scheme and Kent Onshore Scheme being outside areas at medium or high risk of flooding with the Proposed Project's infrastructure, particularly those elements that could be at risk of flooding during the operational lifetime of the Proposed Project, such as the substations, converter stations and cable transition joint bays being located in Flood Zone 1. During construction, the Proposed Project avoids construction compounds in Flood zones 2 and 3.

7.6.27 Due to its linear nature some components of the Proposed Project associated with construction access routes (e.g. proposed temporary bridge over the River Stour in Kent) and where the marine cables make landfall at Suffolk and Kent must necessarily cross areas with a medium and/or high likelihood of flooding (Flood Zones 2 and 3) due to there not being reasonable alternatives at lower risk, however, these components are also of low vulnerability to flooding. In addition, below ground infrastructure such as cabling once constructed will not be subject to flood risk because this infrastructure will be buried and therefore the Sequential Test applies only to the construction phase of these components. As discussed above, commitments have been made to use trenchless crossings of landfall areas to avoid impacts on the floodplain from the

underground cable installation. As detailed in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** locations for landfall for the Suffolk and Kent Onshore Schemes were identified and the appraisal of these considered flood risk.

7.6.28 For the Suffolk Onshore Scheme the identified landfall areas of search had similar flood risk except landfall area of search S3 which had only small areas of flood zones 2 and 3 present. Although a landfall location that could be within an area at a low risk of flooding, this landfall area of search was not chosen as it is significantly constrained from a marine approach perspective due to the presence of rocky reefs and, in the immediate offshore, by the proposed export cable route from the proposed East Anglia One North and Two Offshore Wind Farm Projects.

7.6.29 For the Kent Onshore Scheme the identified landfall areas of search have similar flood risk except landfall areas of search K4 and K5 which have smaller areas of flood zones 2 and 3 present. The marine approaches to these landfalls on the north Kent Coast are however significantly constrained by the potential for permanent habitat loss within Margate and Long Sands SAC and the technical and engineering risks associated with potential cable exposure. Terrestrially K5 is significantly constrained by the settlement with Herne Bay and K4 by access. Landfall areas of search at lower risk of flooding were therefore considered but not selected due to other environmental and engineering constraints. Given the above, the Sequential Test, has, where relevant, been met for site selection and as part of layout and siting of the Proposed Project components in accordance with NPS EN-1, the NPPF and NPS EN-5.

### Exception Test

7.6.30 As a result of parts of the Proposed Project being located within Flood Zone 3, it is necessary to apply the Exception Test in accordance with NPS EN-1, the NPPF and NPPG. The Exception Test in paragraph 5.8.11 of NPS EN-1 requires it to be demonstrated that:

7.6.31 *"a. The development would provide wider sustainability benefits to the community that outweigh the flood risk; and*

7.6.32 *b. the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall".*

7.6.33 Footnote 216 of this paragraph sets out that the wider sustainability benefits to the community include the benefits (including need), for the infrastructure set out in Part 3 of NPS EN-1.

7.6.34 In response to meeting part (a) of the Exception Test the need for the Proposed Project is explained in **Application Document 7.2 Strategic Options Backcheck Report** and summarised in Section 5 of this Planning Statement. The Proposed Project is nationally significant low carbon infrastructure which is of CNP and one of the essential network reinforcements needed to urgently deliver the UK's net zero target. The reinforcement will also support security and reliability of electricity supply. Without reinforcement, the capacity of the existing electricity network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Proposed Project would provide this reinforcement, helping to deliver 50 GW of electricity from offshore wind by 2030, and ultimately contributing towards achieving net zero. Section 5 of this Planning Statement also explains the landscape and ecological enhancements of the Proposed Project's design set out in **Application**

**Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan- Kent**; and benefits of the Proposed Project from employment generation and GVA contribution during construction and safeguarding land within the design for future improvements to PRoW.

7.6.35 In response to meeting part (b) of the Exception Test, this is addressed through the site-specific **FRA (Application Document 6.8)**, which demonstrates that with mitigation the Proposed Project will be safe from flooding throughout its lifetime without increasing flood risk elsewhere, taking into account climate change impacts required by paragraph 5.8.12 of NPS EN-1. Therefore, the Scheme satisfies part (b) of the Exception Test.

7.6.36 As the Proposed Project satisfies both elements of the Exception Test, development of essential utility infrastructure within Flood Zone 3 can proceed in accordance with the policy framework.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.6.37 The **Flood Risk Assessment** (**Application Document 6.8 Flood Risk Assessment)** and supporting assessments and hydraulic modelling provide a site-specific flood risk assessment which has also taken into account Suffolk's and Kent's flood risk management strategies in accordance with NPS EN-1 paragraph 5.8.15 and 5.8.36. The FRA confirms that the Proposed Project, with design mitigation and best practice control measures secured via **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC,** will not increase flood risk elsewhere and will remain safe for its lifetime taking into account climate change in accordance with NPS EN-1 paragraphs 5.8.7, 5.8.12 and 5.8.36. The proposed surface water drainage design set out in the Outline Surface Water Drainage Strategy (Appendix C of **Application Document 6.8 Flood Risk Assessment**) demonstrates that sustainable drainage techniques have been designed and will be maintained for the lifetime of the Proposed Project, in accordance with NPS EN-1 paragraphs 5.8.26, 5.8.27, 5.8.36 and 5.8.39 and SCLP9.6 of the Suffolk Coastal Local Plan, Policy CC02 of the Thanet Local Plan and Policy CC6 of the Dover District Council Local Plan. In addition, the Proposed Project's drainage has been designed with consideration to the hierarchy of methods for discharge, in accordance with Policy CC6 of the Dover District Council Local Plan.

7.6.38 A sequential approach has been applied as part of site selection, as well as at the site level minimising risk by directing vulnerable components of the Proposed Project to areas of lowest flood risk. This demonstrates that the Sequential Test has been met in accordance with NPS EN-1 paragraphs 5.8.21, 5.8.23, 5.8.29 and 5.8.36. The Exception Test has also been applied and passed in accordance with the NPPF and NPS EN-1 paragraph 5.8.11 owing to the wider sustainability benefits that the Proposed Project will deliver and that it will remain safe throughout its lifetime without increasing flood risk elsewhere.

7.6.39 In summary, the Proposed Project is therefore in accordance with the flood risk and drainage policies of NPS EN-1, the NPPF, NPPG and the relevant policies in local development plans.

# 7.7 Water Environment

## Planning Policy Context

### National Planning Policy

7.7.1 Section 5.16 of NPS EN-1 (DESNZ, 2024) sets out policies related to water quality and resources. Where the project is likely to have effects on the water environment, paragraph 5.16.3 expects applicants, as part of their ES, to "*undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment*.". The subsequent paragraphs 5.16.4 to 5.16.7 provide guidance to applicants on matters that this assessment should cover.

7.7.2 Paragraph 5.16.5 of NPS EN-1 encourages applicants "*to manage surface water during construction by treating surface water runoff from exposed topsoil (…) and to limit the discharge of suspended solids (…) during operation"*.

7.7.3 NPS EN-1 Paragraph 5.16.12 states that the SoS, within the decision making process, will need to "*give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017)*".

7.7.4 The SoS must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including Regulation 19) are met (NPS EN-1 paragraph 5.16.14). Paragraph 5.16.16 states that the SoS should also "*consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary*".

7.7.5 NPS EN-5 paragraph 2.9.19 expects applicants to protect surface and groundwater sources as part of proposals for new overhead lines (DESNZ, 2024).

7.7.6 Paragraph 187 of the NPPF and the Water Supply, Wastewater and Water Quality Guidance (Department for Levelling Up, Housing and Communities, 2019) contain similar water environment policies to the NPS and are therefore not repeated here.

### Local Planning Policy

7.7.7 TLP Policy SE04 (Groundwater Protection) (Thanet District Council, 2020) states proposals for development within the Groundwater Source Protection Zones identified on the Policies Map will only be permitted if there is no risk of contamination to groundwater sources.

7.7.8 Policy SCLP10.3 (Environmental Quality) of the SCLP (East Suffolk Council, 2020) requires development proposals to protect water quality and meet Water Framework Directive objectives. Additionally it is stated that proposals should seek to secure improvements in relation to the above where possible and the cumulative effect of development, in this regard, will be considered.

7.7.9 Policy NE5 (Water Supply and Quality) of the DDLP (Dover District Council, 2024) states *"Schemes that would be likely to result in a reduction in the quality or quantity of groundwater resources will not be permitted".*

## Assessment Conclusions

7.7.10 This section presents an overview of the assessments of likely significant water environment effects resulting from the Suffolk and Kent Onshore Scheme.

7.7.11 The construction phase of the Suffolk Onshore Scheme and Kent Onshore Scheme has the potential to impact a range of attributes of the watercourses that flow through the assessment study area (land within the Order Limits together with an additional 500 m buffer from these limits) and change the existing land drainage regime and flood risk. These impacts would be temporary and would result in effects that are not significant. Robust control measures are proposed during construction and are outlined in **Application Document 7.5.3.1 Appendix A Outline CoCP**.

7.7.12 The operational effects of the Suffolk Onshore Scheme and Kent Onshore Scheme would be negligible, with no likely significant effects anticipated on water environment receptors, land drainage or flood risk.

7.7.13 All decommissioning activities related to the Suffolk and Kent Onshore Schemes would be expected to take place in accordance with the relevant environmental permitting regimes and in accordance with good practice measures. These measures would reduce sources of pollution generated by decommissioning, ensuring no significant effects.

### Suffolk Onshore Scheme

7.7.14 **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment** presents the assessment of the likely significant water environment effects that could result from the Suffolk Onshore Scheme.

7.7.15 Once the construction of the Suffolk Onshore Scheme is complete, working areas will be fully reinstated. Surface water drainage from permanent access routes and, the Saxmundham Converter Station and the Friston Substation will pose minimal risks to water quality during the operation and maintenance phase, given the proposed treatment measures described in **Application Document 7.5.3.2 CEMP Appendix B REAC.** All 11 temporary culverts would be removed and watercourse channels reinstated.

7.7.16 Maintenance activities are expected to follow strict control measures (also described in the REAC), ensuring no significant impacts on watercourse flow regimes, flood risk, hydromorphology and water quality.

7.7.17 Operational effects are considered negligible, with no likely significant effects anticipated on water environment receptors, land drainage, or flood risk.

### Kent Onshore Scheme

7.7.18 **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** presents the assessment of the likely significant water environment effects that could result from the Kent Onshore Scheme.

7.7.19 Once the construction of the Kent Onshore Scheme is complete, working areas will be fully reinstated. Surface water drainage from permanent access routes and the Minster

Converter Station and Substation will pose minimal risks to water quality during the operation and maintenance phase, given the proposed treatment measures described in **Application Document 7.5.3.2 CEMP Appendix B REAC.** All 26 temporary culverts and the temporary bridge over the River Stour required for the construction phase would be removed. Watercourse channels would then be reinstated.

7.7.20 Maintenance activities are expected to follow strict control measures (also described in the REAC), ensuring there would be no significant impacts on watercourse flow regimes, flood risk, hydromorphology and water quality. The assessment concludes that operational effects would be negligible, with no likely significant effects anticipated on water environment receptors, land drainage or flood risk.

### Water Framework Directive Assessment

7.7.21 A Water Framework Directive (WFD) Assessment of the Proposed Project has been completed and submitted as part of the application for development consent (**Application Document 6.9 Water Framework Directive Assessment**). The WFD waterbodies screened in the assessment were as follows:

- In Suffolk: Hundred River, Fromus, Suffolk Waterbody and Alde & Ore
- In Kent: Monkton and Minster Marshes, Kent North Waterbody and Stour Waterbody

7.7.22 The assessment concludes that the residual effects of Proposed Project activities on WFD waterbodies would be negligible, with no potential for waterbody deterioration at the waterbody scale following implementation of the embedded and good practice measures. The assessment concludes that the Proposed Project is compliant with the objectives of the WFD.

7.7.23 In addition to the embedded and good practice measures to reduce detrimental impacts on the waterbodies and avoid deterioration of their WFD status, some measures contributing towards improvements of their WFD status are proposed. The Suffolk Onshore Scheme will deliver enhancement of an approximately 500 m stretch of the riparian corridor along the River Fromus. Within this stretch, at specific locations, reprofiling of selected areas of the banks of the River Fromus will be implemented to create an approximately 50 cm wide berm just above the typical summer water level. This berm will be planted with riparian vegetation and will enhance the value of the River Fromus. Details are set out in **Application Document 7.5.7.1 oLEMP – Suffolk.**

7.7.24 It is proposed as part of the Kent Onshore Scheme to deliver a series of small shallow riverside scrapes with riparian planting, and some alder and willow planting, along the River Stour within the Order Limits, to increase the ecological value of what is currently a predominantly arable landscape (north of the River Stour). The Azolla weevil will also be released into the watercourses, as part of the Kent Onshore Scheme, to control the invasive water fern Azolla filiculoides. Further details on these measures are available in **Application Document 7.5.7.2 oLEMP – Kent.** These proposals align with the WFD (Water Environment (Water Framework Directive) (England and Wales) Regulations 2017), which promote ecological enhancement, and help ensure that schemes contribute to the improvement of the ecological status of these watercourses.

7.7.25 The WFD assessment notes that there are no specific measures set out in the River Basin Management Plans to improve the future status of the waterbodies which have been included in the assessment.

7.7.26 Overall, because of the proposed enhancement measures, the Proposed Project would deliver a long-term net increase in woody and wetland habitats.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.7.27 As required in paragraphs 5.16.3 to 5.16.7 of NPS EN-1 (DESNZ, 2024), the effects of the Proposed Project on the water environment have been assessed as part of the ES. The assessment has covered impacts on water quality, surface water and land drainage, hydromorphology and flood risk. The potential for the Proposed Project to compromise objectives established under the WFD has also been assessed in a separate document with reference to the specific objectives set for relevant waterbodies within the Anglian River Basin Management Plan (for the Suffolk Onshore Scheme) and the South East River Basin Management Plan (for the Kent Onshore Scheme). Measures aimed at improving the WFD status of the waterbodies affected by the Proposed Project are proposed.

7.7.28 In accordance with paragraphs 5.16.8 to 5.10.10 of NPS EN-1 regarding the need to consider mitigation measures, the Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce water environment impacts and effects through the process of design development and by embedding measures into the design of the Proposed Project. The full list of mitigation measures proposed to minimise impacts to the water environment during construction and operation is provided in **Application Document 7.5.3.2 CEMP Appendix B REAC.** Measures relevant to the control and management of impacts during construction are outlined in **Application Document 7.5.3.1 Appendix A Outline CoCP**.

7.7.29 Measures for the treatment of surface water runoff during construction and operation have been included, as per paragraph 5.16.5 of NPS EN-1. During construction, construction compounds, haul roads and bellmouths will be served by Sustainable Drainage Systems (SuDS) comprising filter drains, swales and header drains. These would include pollution controls to address the possibility of runoff contamination with oils and silts. During operation, the converter stations would also be served with drainage systems that embed SuDS for attenuation of runoff to greenfield runoff rates in line with the receiving watercourse authorities.

7.7.30 The WFD assessment makes it clear that the Proposed Project is not likely to cause deterioration of the WFD status of the waterbodies interacting with the Proposed Project. Paragraph 5.6.14 of NPS EN-1, stating that the SoS must refuse consent where a project is likely to cause deterioration of a waterbody or its failure to achieve good status, is therefore not engaged.

7.7.31 Overall, given that the mitigation hierarchy has been followed, and there are no likely significant residual effects in relation to water environment receptors during all phases of the Proposed Project, it is considered that the Proposed Project is in accordance with both national and local policy with regard to impacts on the water environment.

# 7.8 Geology and Hydrogeology

## Planning Policy Context

### National Planning Policy

7.8.1 Paragraph 5.4.17 of NPS EN-1 (DESNZ, 2024)states that "[…] *Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on*

*internationally, nationally and locally designated sites of … geological conservation importance*". Paragraph 5.4.19 further adds that applicants "*should show how the project has taken advantage of opportunities to conserve and enhance geological conservation interests*".

7.8.2 Paragraph 5.4.42 expects:

*"As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought".*

7.8.3 Paragraph 5.11.8 requires the ES to "*identify existing any proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing.""*.

7.8.4 Paragraph 5.11.17 advises that "*Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination*".

7.8.5 Paragraph 5.11.19 states that "*Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place*" Paragraph 5.11.28 adds that "*Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources"*. Paragraph 5.16.7 states that "*The ES should in particular describe: any impacts of the proposed project on… source protection zones (SPZs) around potable groundwater abstractions*".

7.8.6 Paragraph 2.2.10 of NPS EN-5 (DESNZ, 2024) states that "*[…]applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest*."

7.8.7 There is no specific policy in NPS EN-3 (DESNZ, 2024) that is directly relevant to this topic.

7.8.8 Paragraphs 187, 192, 196 and 223 of the NPPF and the NPPG, including 'Land Affected by Contamination' (Minstry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2019) and also 'Land Stability' (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2019) contain similar Geology and Hydrogeology policies to the NPS and are therefore not repeated here.

### Local Planning Policy

7.8.9 Local planning policy supports the protection and enhancement of geodiversity through:

- SCLP Policy SCLP10.1 (Biodiversity and Geodiversity) (East Suffolk Council, 2020).
- TLP Policy SP30 (Biodiversity and Geodiversity Assets) (Thanet District Council, 2020)

- DDLP Policy SP13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets) (Dover District Council, 2024)

7.8.10 SCLP Policy SCLP10.3 (Environmental Quality Policy), TLP Policies SE02 (Landfill Sites and Unstable Land) and SE03 (Land affected by Contamination) relate to the identification and mitigation of unstable land or contaminated land. There is no specific policy on contaminated land in the DDLP.

7.8.11 Local planning policy supports the protection of groundwater through TLP policy SE04 (Groundwater Protection) and DDLP Policy NE5 (Water Supply and Quality). There is no specific policy on groundwater protection in the SCLP.

7.8.12 Policy MP10 (Minerals Consultation and Safeguarding) of the Suffolk Minerals and Waste Local Plan (Suffolk County Council, 2020) states that the County Council will safeguard:

*"a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha. The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development;*

*b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction (…)".*

7.8.13 Policy MP10 also sets out that the District Councils must consult the County Council when a proposal falls within a Minerals Consultation Area. No safeguarded minerals have been identified within the Kent Onshore Scheme Boundary that would be impacted by the Proposed Project. Policies of the Kent Minerals and Waste Local Plan (Kent County Council, 2020) are therefore not material to the determination of the application.

## Assessment conclusions

7.8.14 **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology** provide assessments of the likely effects on geology and hydrogeology that could result from construction, operation and decommissioning of the Suffolk Onshore Scheme and Kent Onshore Scheme, respectively. These include assessments of the potential for existing contamination and pollutant linkages, in relation to sensitive receptors such as human health and groundwater.

7.8.15 The study area for geology and hydrogeology comprises the Order Limits for the Suffolk and Kent Onshore Schemes plus a 250 m buffer for geology and contaminated land and up to 500 m for hydrogeology. There are no designated geological sites within the study area in Suffolk. The Sandwich Bay to Hacklinge Marshes SSSI is the only designated geological site identified within the study area in Kent. The impacts on this receptor are assessed within **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Processes** as it is located within the marine section of the Proposed Project.

7.8.16 **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** assess the exposure of existing ground contamination through ground disturbance for both the Suffolk and Kent Onshore Schemes during construction and decommissioning. The results of the assessments

identified a generally low risk of significant existing ground contamination within the study areas. With good practice measures, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP**, the impacts from existing ground contamination on construction workers is considered negligible (not significant).

7.8.17 Groundwater risk assessments have been undertaken for both Suffolk and Kent Onshore Schemes and are set out in **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**. The assessments conclude that there is a low/moderate risk of existing contamination within groundwater, that could be mobilised. However, with control and management measures set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP** the potential effects of groundwater contamination are expected to be minor due to mitigation measures

7.8.18 Whilst safeguarded minerals have not been identified within the study area for the Kent Onshore Scheme**,** the majority of the Suffolk Onshore Scheme (around 70%) is located within a Mineral Consultation Area (MCA), according to the policies map accompanying the Suffolk Minerals and Waste Local Plan (Suffolk County Council, 2020). Although in an MCA, the Suffolk Onshore Scheme does not cross any active mineral extraction sites and is not located within a Minerals Safeguarding Area.

7.8.19 As set out in **Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment,** impacts on mineral resources can be considered temporary, as upon decommissioning of the Proposed Project the permanent infrastructure could be removed and access to the underlying mineral restored. Given that Suffolk has greater than the minimum 7-year landbank of sand and gravels required by National Planning Policy, and sufficient additional safeguarded areas, it is considered that the Minerals Resource impacts are negligible (not significant). Overall, with embedded mitigation measures, there are no likely significant residual effects in relation to geology and hydrogeology that could result from the Suffolk and Kent Onshore Schemes during their construction, operation and maintenance and decommissioning phases.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.8.20 As required by paragraph 5.4.17 of NPS EN-1 (DESNZ, 2024), the ES has identified designated sites within the study areas for the Suffolk and Kent Onshore Schemes. There are no designated geological sites in Suffolk and in Kent, the designated geological site is located within the coastal margin and is therefore considered in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment.**

7.8.21 As set out in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology,** geology and hydrogeology effects have been mostly avoided through design, by avoiding where practicable, known sources of significant potential contamination (e.g. landfills) and receptors such as high sensitivity hydrogeological features. The Proposed Project incorporates suitable consideration of the ground conditions in the design, based on data from site-specific ground investigation and assessment, and therefore any risks from ground instability, chemical aggressivity of the ground, ground gases and radon reports would be considered within the engineering design of the new infrastructure in accordance with best practice.

7.8.22 Good practice measures and commitments have been outlined in **Application Document 7.5.3.2 CEMP Appendix A Outline CoCP** and **Application Document 7.5.3.2 CEMP Appendix B REAC**. With these measures, there are no likely significant residual effects in relation to geology and hydrogeology receptors during construction, operation and maintenance and decommissioning of the Suffolk and Kent Onshore Schemes.

7.8.23 The Proposed Project has therefore sought to conserve geological conservation sites (as required by paragraph 5.4.19 of NPS EN-1) and has followed the general principle that development should, in line with the mitigation hierarchy, aim to avoid significant harm to geological conservation interests (as recommended in paragraph 5.4.42 of NPS EN-1).

7.8.24 Further groundwater and contamination assessments were undertaken in accordance with paragraph 5.11.17 of NPS EN-1 to ensure that the land within the Order Limits are suitable and safe for the Proposed Project.

7.8.25 The majority of the Suffolk Onshore Scheme lies within an MCA. Parts (a) and (b) of Policy MP10 of the Suffolk Minerals and Waste Local Plan (Suffolk County Council, 2020) (see Local Planning Policy section above) are therefore not applicable as the Proposed Project is not situated within a Minerals Safeguarding Area and is not within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The only requirement of Policy MP10 that applies to the Proposed Project, due to its location within an MCA, is for the County Council to be consulted by the Districts on Town and Country Planning Act applications.

7.8.26 In accordance with paragraph 5.11.19 of NPS EN-1 the Suffolk Onshore Scheme is not expected to have an adverse impact on mineral resources. This is due to the Suffolk Onshore Scheme being designed to not cross any active mineral extraction sites the impact on mineral resources being considered temporary and that the Suffolk Onshore Scheme.

7.8.27 Overall, the Proposed Project is in accordance with both national and local policy in regard to geology and hydrogeology impacts.

## 7.9 Agriculture and Soils

### Planning Policy Context

#### National Planning Policy

7.9.1 Paragraph 5.11.12 of NPS EN-1 (DESNZ, 2024) states that "*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*". Paragraph 5.11.13 also specifies that applicants should *"identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed".* Applicants are encouraged to prepare a Soil Management Plan (paragraph 5.11.14).

7.9.2 Paragraph 5.11.34 of NPS EN-1 requires the SoS to ensure "*applicants do not site their Proposed Development on the best and most versatile agricultural land without justification*". Paragraph 5.11.34 further adds:

"*Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*".

7.9.3 Paragraph 2.9.25 of NPS EN-5 (DESNZ, 2024) relates to cases where the SoS needs to consider the benefits of undergrounding of a proposed line over an overhead alternative and states that, in this context, the SoS should consider:

*"the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. (…)".*

7.9.4 There is no specific policy in NPS EN-3 (DESNZ, 2024) that is directly relevant to this topic.

7.9.5 Paragraphs 187, 188 and Footnote 65 of the NPPF and the NPPG for the 'Natural Environment' contain similar agriculture and soils policies to the NPS and are therefore not repeated here.

### Local Planning Policy

7.9.6 SCLP Policy SCLP10.3 (Environmental Quality) (East Suffolk Council, 2020) states:

"*Development proposals will be considered in relation to impacts on (…)*

*b) Soils and the loss of agricultural land".*

7.9.7 TLP Policy E16 (Best and Most Versatile Agricultural Land) (Thanet District Council, 2020) states:

*"Except on sites allocated for development by virtue of other policies in this Plan, planning permission will not be granted for significant development which would result in the irreversible loss of best and most versatile agricultural land unless it can be clearly demonstrated that:*
*1) the benefits of the proposed development outweigh the harm resulting from the loss of agricultural land,*
*2) there are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and*
*3) the development will not result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land."*

7.9.8 In addition, TLP Policy SP30 (Biodiversity and Geodiversity Assets) indicates that development proposals should "*protect and enhance valued soils"*.

7.9.9 DDLP Policy CC3 (Renewable and Low Carbon Energy Development) (Dover District Council, 2024) supports development to general energy from renewable and low carbon sources where it is demonstrated that (inter alia) *"there is no significant loss of the best and most versatile agricultural land, unless it can be demonstrated that no alternative lower-grade land is available"*.

## Assessment Conclusions

7.9.1 **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** present

the assessment of the likely significant agriculture and soils effects that could result from the Suffolk Onshore Scheme and the Kent Onshore Scheme (respectively).

7.9.2 An assessment (using predictive modelling) was undertaken to assign grades to agricultural land within the Order Limits, in accordance with the Agricultural Land Classification (ALC) system. **Application Document 6.3.2.6.A Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk** and **Application Document 6.3.3.6.A Appendix 3.6.A Predictive Agricultural Land Classification Report – Kent** provide further details on this assessment.

7.9.3 The extent of each predicted ALC grade within the Order Limits is presented in Table 6.12 (Predictive agricultural land by area (ha)) in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils** for the Suffolk Onshore Scheme and Table 6.13 (Predictive agricultural land by area (ha)) in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils** for the Kent Onshore Scheme.

7.9.4 As shown in Table 6.12, 67.75% (189.25 ha) of the land within the Order Limits for the Suffolk Onshore Scheme is graded as Best and Most Versatile (BMV) land (ALC Grade 1, 2 and 3a), with the majority (155.45 ha) of this BMV land being ALC Grade 3a. There is no ALC Grade 1 land within the Order Limits for the Suffolk Onshore Scheme.

7.9.5 As shown in Table 6.13, 50.11% (85.01 ha) of the land within the Order Limits for the Kent Onshore Scheme is graded as BMV land, with the majority 53.36 ha) of this BMV land being ALC Grade 3a. There is no ALC Grade 1 land within the Order Limits for the Kent Onshore Scheme.

7.9.6 **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk** and **Application Document 7.5.10.2 Outline Soil Management Plan - Kent** have been prepared to ensure the effective management, protection and reinstatement of soil resources throughout the phases of the Proposed Project. The plans outline the necessary measures to minimise soil degradation and promote sustainable land use in accordance with best practice and regulatory requirements. In accordance with Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1 Draft DCO)** detailed soil management plans will be provided for approval post consent and will need to be substantially in accordance with the outline plans.

7.9.7 Construction activities required by both the Suffolk Onshore Scheme and the Kent Onshore Scheme will lead to temporary disturbance to soils (adversely affecting the ecosystem services the soils provide) as well as temporary removal of BMV land from agricultural production (e.g., for temporary access roads, construction compounds and soil stripping). Although the assessment concludes these effects during construction are significant, the effects are temporary with the majority of the land proposed to be reinstated to the pre-construction condition and ALC grade by the end of the construction phase, in accordance with the control measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP**. In addition, soil resources from the footprint of the permanent infrastructure would be re-used within the Proposed Project where practicable, enabling an associated range of soil functions to continue.

7.9.8 Construction activities would also require permanent land take for the Proposed Project's permanent infrastructure (e.g. permanent accesses, pylons, converter stations), which would impact on BMV land. As set out in Table 6.13 (Predictive ALC Grades (ha) affected by the temporary and permanent design features of the Proposed Project) in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils**, the Suffolk Onshore Scheme would require a total permanent land take of 11.59 ha, of which 11.45 ha is BMV land (ALC Grades 2 and 3a). For the Kent Onshore

Scheme, a total permanent land take of 12.27 ha is required, of which 12.21 ha is graded as BMV land (see Table 6.14 Predicted ALC Grades (ha) affected by the temporary and permanent design features of the Proposed Project in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils**). For both schemes, this is assessed as a major to moderate adverse effect, that is significant.

7.9.9 During the operation and maintenance phase of the Suffolk Onshore Scheme and the Kent Onshore Scheme, any disturbance to soils or agricultural land is expected to be small-scale, infrequent and temporary, and there would be no significant effect. Permanent loss of agricultural land reported under the construction phase would remain lost during the operational phase.

7.9.10 The effects during decommissioning would be similar to those identified during the construction phase. However, the decommissioning phase would allow for the reinstatement of soils and agricultural land used for above ground infrastructure, which is considered to be a moderate to major beneficial effect. It is estimated that 11.47 ha of BMV land in Suffolk and 12.21 ha of BMV land in Kent would be reinstated. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning and detailed in **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk** and **Application Document 7.5.10.2 Outline Soil Management Plan - Kent.**

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.9.11 In line with paragraph 5.11.12 of NPS EN-1, National Grid has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. The optioneering and site selection process is set out in details **8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** and **Application Document 8.2 Options Selection and Design Evolution Report (October 2023),** and summarised in **Application Document 7.3 Design Development Report.** The presence of provisionally graded BMV land formed part of the routeing and siting process, in particular in the appraisal of the converter site option areas.

7.9.12 The construction of the permanent infrastructure for the Proposed Project would involve the permanent loss of BMV land (11.45 ha for the Suffolk Onshore Scheme and 12.21 ha for the Kent Onshore Scheme), which is assessed as a significant effect. The bulk of this loss is required for the construction of the proposed converter stations. The location of the converter stations has been determined by the selected network connection points; Friston Substation in Suffolk and initially, Richborough Substation in Kent. The Kent Onshore Scheme remains restricted by the need to connect into the Richborough to Canterbury 400 kV line, which also routes predominantly through BMV land restricting the range of potential suitable sites.

7.9.13 Areas of search for potential converter station sites had to be located within a radius of approximately 5 km of the identified connection points. This was to ensure as short as possible AC connection between the converter station and connection point. The greater the AC cable length the greater the losses which need to be reduced with the use of reactive compensation equipment, which would result in additional land take and cost (see **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** for further details). Although the presence of provisional BMV land was a consideration in the siting of the converter stations, this had to be

balanced against other key environmental and technical constraints which meant sites which have BMV land were chosen, although sites with lower grades of BMV land were chosen over those which contained Grade 1. However, avoidance of Grade 1 agricultural land was a key consideration in selecting sites for the converter stations, as explained in **Application Document 7.3 Design Development Report**.

7.9.14 Overall, the temporary nature of many of the construction activities and the subsequent restoration of the land, and its return to pre-construction use is likely to result in the avoidance of long-term impacts on agricultural and soil receptors. Mitigation measures that are embedded into the design of the Proposed Project to reduce, and where possible, avoid agricultural and soils effects are set out in **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP, Application Document 7.5.3.2 CEMP Appendix B REAC.** As encouraged by paragraph 5.11.14 of NPS EN-1 (DESNZ, 2024), outline Soil Management Plans (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent**) have been prepared. These plans set out measures to ensure soils are protected as far as possible during construction. Final Soil Management Plans are required to be prepared and submitted to the relevant planning authority for approval by Requirement 6 of **Application Document 3.1 Draft DCO.**

7.9.15 In summary, the Proposed Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Proposed Project. Dealing with the local policy tests, the benefits provided by the Proposed Project, explained in Section 5 of this Planning Statement, outweigh the resultant loss of BMV agricultural land. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Proposed Project. The impact on the viability of agricultural holdings was scoped out of the ES and will be dealt with through compensation agreements which lie outside of the ES process (as explained in **Application Document 6.15 Scoping Opinion 2022**).

7.9.16 Overall, it is considered that the Proposed Project is in accordance with the national and local policies relating to the protection of agricultural land as the use of agricultural land and the permanent loss of BMV land during construction is justified.

## 7.10 Transport and Access

### Planning Policy Context

#### National Planning Policy

7.10.1 Section 5.14 of NPS EN-1 (DESNZ, 2024) sets out the policy requirements for the consideration and mitigation of transport related impacts of NSIP development, confirming at paragraph 5.14.4 that the consideration and mitigation of traffic and transport impacts is "*an essential part of the Government's wider policy objectives for sustainable development*".

7.10.2 Paragraph 5.14.5 of NPS EN-1 requires applicants to include a Transport Appraisal within the ES, where a project is likely to have significant transport implications. Paragraph 5.14.6 requires applicants to consult with National Highways and Highways Authorities with regard to the assessment and mitigation that informs the application.

7.10.3 As set out in paragraph 5.14.7 of NPS EN-1, applicants should prepare a travel plan including demand management and monitoring measures to mitigate impacts on transport. It states that "*The applicant should also provide details of proposed measures to improve access by active, public and shared transport*".

7.10.4 NPS EN-1 paragraph 5.14.12 requires the applicant to consider a modal shift of freight from road to more environmentally sustainable alternatives at all stages of the project. "*Regard should be given to the needs of freight at all stages in the construction and operation of the development*" (paragraph 5.14.13 of NPS EN-1).

7.10.5 Paragraph 5.14.14 states that the "*Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that… control numbers of HGV movements to and from the site in a specified period during its construction and possible on the routing of such movements… and ensure satisfactory arrangements for reasonably foreseeable abnormal disruption*".

7.10.6 Paragraph 5.14.18 recognises that energy NSIPs may result in substantial impacts on the surrounding infrastructure, and requires the applicant to mitigate these impacts, including during the construction phase. Paragraph 5.14.21 of NPS EN-1 states that development should only be refused consent on highway grounds if there would be an "*unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision*".

7.10.7 Section 9 of the NPPF covers 'Promoting sustainable transport' and the NPPG provides advice on 'Transport evidence bases in plan making and decision taking1 and 'Travel Plans, Transport Assessments and Statement'. These policies and guidance are similar to those in NPS EN-1 and are therefore not repeated here.

### Local Planning Policy

7.10.8 SCLP Policy SCLP7.1 (Sustainable Transport) (East Suffolk Council, 2020) expects development to promote non-car travel options, mitigate impacts on the transport network, integrate with pedestrian and cycle routes, and contribute to local sustainable transport strategies; significant developments must include a Travel Plan, and transport impacts will be assessed based on scale and nature, with specific requirements for large residential and employment sites.

7.10.9 TLP Policy SP45 (Transport Infrastructure) (Thanet District Council, 2020) states development proposals will be evaluated based on their travel demand impact, and approval will be contingent upon making necessary provisions for transport infrastructure, including improvements to walking, cycling, public transport facilities, and road networks.

7.10.10 DDLP Policy TI1 (Sustainable Transport and Travel) (Dover District Council, 2024) also promotes the provision of sustainable transport options. Policy TI2 (Transport Statements, Assessments and Travel Plans) states that Developments that would generate significant traffic movements must be well related to the primary and secondary road network and that types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted.

7.10.11 The Kent Local Transport Plan (Kent County Council, 2024) published in December 2024 does not contain any specific policies relating to transport and access. However, the document's aims include providing the county's transport network, and maintaining

safe and accessible travel and trade. Similar principles are set out in the Suffolk Local Transport Plan (Suffolk County Council, 2025).

## Assessment Conclusions

7.10.12 **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** of the ES present the assessment of the likely effects of construction traffic generated by the Suffolk Onshore Scheme and Kent Onshore Scheme. These chapters include an assessment of severance; pedestrian delay; non-motorised user amenity; fear and intimidation; driver delay; road safety; hazardous/ large loads; and PRoW diversions and closures.

7.10.13 These assessments are supported by **Application Document 6.3.2.7.A Appendix 2.7.A Suffolk Transport Assessment Note** (TAN) and **Application Document 6.3.3.7.A Appendix 3.7.A Kent TAN.** The TAN provides assessment of the impacts of the Suffolk Onshore Scheme and Kent Onshore Scheme on the local highway network managed by Kent County Council and Suffolk County Council, and the Strategic Road Network (SRN) managed by National Highways. Separate Transport Assessments have not been produced as the assessment has largely been incorporated into **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**. This approach was agreed through consultation with Kent County Council and Suffolk County Council as the local highway authorities, and National Highways, which manages the SRN.

7.10.14 The focus of the traffic and transport assessment 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** is the construction phase as the Proposed Project is expected to generate a very low level of vehicle movements during the operational and maintenance phase as discussed in Section 4 of this Planning Statement. During the decommissioning phase, the assessments have assumed impacts will be similar to the construction phase.

7.10.15 The assessment presented 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** conclude that with mitigation measures, no significant adverse effects on sensitive receptors, including PRoW, and on the use and safety of the local road network, are anticipated during construction. The Suffolk and Kent TAN's (**Application Document 6.3.2.7.A Appendix 2.7.A Suffolk TAN and 6.3.3.7.A Appendix 3.7.A Kent TAN.**) conclude that the impacts of the Suffolk and Kent Onshore Schemes on the SRN would not be significant. Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan- Suffolk** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent**. These documents also explain the approach to travel planning for construction staff, including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan (PRoWMP) – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent.**

7.10.16 An assessment of inter-cumulative effects is presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** and **Application Document Number 6.2.3.13 Part 3 Kent**

**Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** which assesses the other developments identified within the TAN. This concludes that no significant cumulative effects are expected upon the SRN or local road network as a result of construction traffic generated by the Suffolk Onshore Scheme or Kent Onshore Scheme when combined with construction/ operational traffic associated with other committed developments in isolation or when considering all committed developments combined.

## Appraisal of Suffolk Onshore Scheme and Kent Onshore Scheme

7.10.17 In accordance with Paragraphs 5.14.5 and 5.14.6 of NPS EN-1, the scope and approach taken for the transport assessments discussed above has been agreed with National Highways and the relevant Highways Authorities (Kent County Council and Suffolk County Council).

7.10.18 The assessment concludes that traffic generated during construction, operation and decommissioning of the Proposed Project will not result in significant adverse effects on road users, pedestrians, equestrians or cyclists and road links in terms of severance, delay, amenity, fear and intimidation, hazardous/large loads or accidents and safety.

7.10.19 Impacts on the local highway network and SRN are considered acceptable during the construction phase. Impacts would be temporary and would be managed through the measures set out in construction traffic management and travel plans. Outline plans are provided as part of the application submission (**Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan- Suffolk** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent**) with detailed plans to be brought forward under Schedule 3 Requirement 6 of the draft DCO.

7.10.20 A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. **Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent** explain the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project.

7.10.21 In response to NPS EN-1 paragraph 5.14.12, consideration has been given to the shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways. As set out in Table 7-1 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and Table 7-1 of **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**, the requirements of the Proposed Project are such that the only feasible method, resulting in least disruption, is to make use of the existing highway network during both the construction and operational phases. However, as noted above no significant adverse effects are anticipated as a result of the construction phase.

7.10.22 In response to NPS EN-1 Paragraph 5.14.21, no significant adverse cumulative effects on the SRN or local road network are expected as a result of construction traffic generated by the Suffolk Onshore Scheme and Kent Onshore Scheme when combined with construction/ operational traffic associated with other committed developments in isolation or when considering all committed developments combined.

7.10.23 In summary, with the implementation of appropriate mitigation measures, including the Outline CTMPs, traffic generated by the Proposed Project is not expected to result in any significant adverse environmental effects. It is also not expected that the Proposed

Project will have a significant impact on the strategic or local highway networks in terms of their capacity and highway safety. Effects resulting from the diversion of a limited number of PRoWs during construction and operation, will be managed appropriately in accordance with the Outline PRoW Management Plans (**Outline PRoWMP** (**Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent)**.

7.10.24 Overall, the Proposed Project would not have an unacceptable impact on highway safety or result in severe residual cumulative impacts on the SRN or local road network. The Suffolk Onshore Scheme and Kent Onshore Scheme also include measures in their respective Outline Traffic Management Plans to promote public transport and active travel provision. The Proposed Project is therefore in accordance with the transport and access policies of NPS EN-1, the NPPF and the relevant local plans and transport plans.

## 7.11 Air Quality

### Planning Policy Context

#### National Planning Policy

7.11.1 NPS EN-1 (DESNZ, 2024) paragraph 5.2.8, requires applicants to undertake an assessment of the impacts of the proposed project as part of the ES, where a project is likely to have adverse effects on air quality.

7.11.2 NPS EN-1 paragraph 5.2.9 asserts that "*The ES should describe:*

- *existing air quality concentrations and the relative change in air quality from existing levels;*
- *any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;*
- *the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and*
- *any potential eutrophication impacts*."

7.11.3 Paragraph 5.2.13 of NPS EN-1 states that the SoS should consider whether mitigation measures are needed, noting that a "*construction management plan may help codify mitigation at this stage*". It also sets out that the SoS should have regard to the Air Quality Strategy and should consider relevant advice within Local Air Quality Management guidance.

7.11.4 Paragraph 5.2.16 of NPS EN-1 explains that air quality considerations should be given substantial weight in the decision making process, especially where a project would lead to a deterioration in air quality. It also states that "*air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets*".

7.11.5 NPS EN-1 paragraph 5.7.1 requires mitigation of impacts from a range of emissions, including dust, to be included within the Development Consent Order, as they have the potential to have a detrimental effect on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act (1990).

7.11.6 Paragraph 5.7.4 of NPS EN-1 (Ref 2) acknowledges that some impact on amenity for local communities is likely to be unavoidable, therefore "*the aim should be to keep impacts to a minimum, and at a level that is acceptable"* Paragraph 5.7.5 requires an assessment to be undertaken on the potential for dust impacts and the effect on amenity within the ES and paragraph 5.7.6 sets out the criteria for such an assessment.

7.11.7 In its decision making, paragraph 5.7.12 of NPS EN-1, states that the SoS should satisfy itself that an assessment of dust has been carried out and all reasonable steps have or will be taken to minimise any detrimental impacts.

7.11.8 Section 15 of the NPPF sets out policies for 'Conserving and enhancing the natural environment', including air quality (paragraphs 187, 199). Given the policies in this section are similar to those in NPS EN-1 above, they are not repeated here.

### Local Planning Policy

7.11.9 SCLP Policy SCLP10.3 (Environmental Quality) (East Suffolk Council, 2020) requires that development proposals must protect environmental quality by minimizing pollution and contamination, addressing impacts on air quality, soils, land contamination, water quality, light pollution, and noise, and should seek improvements in these areas, considering the cumulative effects of development.

7.11.10 TLP Policy SE05 (Air Quality) (Thanet District Council, 2020) states major developments must promote low-emission transport, be accessible to public transport, walking, and cycling, and include measures to mitigate air quality impacts; an Air Quality and/or Emissions Mitigation Assessment is required for projects likely to affect air quality, especially in areas with existing air quality issues.

## Assessment Conclusions

7.11.11 **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** provide assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Suffolk Onshore Scheme and Kent Onshore Scheme. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**.

7.11.12 The assessments conclude that during construction, operation and decommissioning phases the effects on air quality from vehicle emissions generated by the Suffolk Onshore Scheme and Kent Onshore Scheme would be negligible and therefore not significant. Similarly, effects of emissions on air quality generated by Non-Road Mobile Machinery used during construction and decommissioning are also negligible. The construction dust assessments conclude that effects from the Suffolk Onshore Scheme and Kent Onshore Scheme on local amenity and ecological sites would be not significant.

7.11.13 These conclusions assume design mitigation and management measures proposed, set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP** as well as the **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent** are implemented.

7.11.14 For the Kent Onshore Scheme, diesel-fuelled backup generators are proposed at the Minster Converter Station and Substation. Additional measures including adhering to emissions standards and careful placement to manage the impacts of these emissions from these generators at sensitive receptors, in the unlikely event that they are needed, during operation, are proposed and included in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent.** These measures would ensure emissions from the back-up generators do not have significant adverse effects on ecological receptors, in particular the Sandwich Bay to Hacklinge Marshes SSSI, which is located approximately 20 m from the Minster Converter Station and Substation.

7.11.15 During the operational phase of the Suffolk Onshore Scheme, back-up generators would also be located at the Friston Substation and Saxmundham Converter Station. However, there are no human or ecological receptors within 200 m of their respective LoD. The effect of back-up generator emissions associated with the operational phase of the Suffolk Onshore Scheme is predicted to be not significant.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.11.16 In accordance with NPS EN-1 paragraphs 5.28 and 5.2.9 and TLP policy SE05, **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assess the likely air quality effects that would result from the Proposed Project and consider the existing baseline conditions and the likely changes and effects to air quality levels during the construction, operation and maintenance and decommissioning phases. The assessments confirm there would not be a deterioration in air quality or substantial changes in air quality levels and therefore are not expected to have significant adverse effects upon air quality. The Suffolk Onshore Scheme and Kent Onshore Scheme would also not lead to a breach of any national air quality limits or statutory air quality objectives.

7.11.17 In accordance with NPS EN-1 sections 5.7.4, 5.7.6 and 5.7.12 construction dust assessments have also been carried out for the Suffolk Onshore Scheme and Kent Onshore Scheme confirming that, with the implementation of good practice control measures, effects on local amenity and ecological receptors would be minimised and would therefore be kept to acceptable levels.

7.11.18 The Onshore Scheme has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC.** Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A CoCP.** The detailed CEMP would come forward post consent as secured by Requirement 6 in Schedule 3 of the draft DCO (**Application Document 3.1**). The Suffolk Onshore Scheme and Kent Onshore Scheme would also not lead to a breach of any national air quality limits or statutory air quality objectives.

7.11.19 Air quality management plans have been compiled and presented in **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent**. Both management

plans set out measures to control and manage air quality impacts during construction including the provision of construction dust management plans which demonstrates compliance with NPS EN-1 paragraph 5.2.13. As committed in these plans, construction vehicles will conform to relevant applicable standards and will be correctly maintained and operated in accordance with the manufacture's recommendations, therefore reducing vehicle emissions in line with TLP Policy SE05 (Air Quality) (Thanet District Council, 2020).

7.11.20 In summary, NPS EN-1 directs the SoS to give substantial weight to air quality considerations as part of decision making however, it has been demonstrated that there will be no significant adverse effects upon air quality during each phase of the Suffolk Onshore Scheme and Kent Onshore Scheme and effects can be managed to acceptable levels. The Proposed Project therefore accords with NPS EN-1 and local policies relevant to air quality.

7.11.21 The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP.** The detailed CEMP would come forward post consent as secured by a requirement in Schedule 3 of the draft DCO (**Application Document 3.1**).

## 7.12 Noise and Vibration

### Planning Policy Context

#### National Planning Policy

7.12.1 Paragraph 5.12.6 of NPS EN-1 (DESNZ, 2024) requires a noise assessment to be prepared where noise and vibration impacts are likely to arise and sets out the methodology for this assessment. Paragraph 5.12.9 of NPS EN-1 expects operational noise impacts, with respect to human receptors, to be assessed using the principles of the relevant British Standards and other guidance.

7.12.2 NPS EN-1 expects energy NSIPs to demonstrate good design with regard to mitigating noise impacts. Specifically, paragraph 5.12.15 of NPS EN-1 requires projects to "*demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible*". It also suggests the optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. Paragraph 4.7.3 of NPS EN-1, and paragraph 3.5.2 of NPS EN-3 (DESNZ, 2024) also explains that 'good design' should mitigate impacts such as noise.

7.12.3 Paragraph 2.9.39 of NPS EN-5 (DESNZ, 2024) notes that for *"the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory"*. Paragraphs 2.9.40 to 2.9.42 further explain the criteria for the assessment of noise from overhead lines in dry and wet weather.

7.12.4 NPS EN-1 (DESNZ, 2024) paragraph 5.12.17 states that the SoS "*should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:*

- avoid significant adverse impacts on health and quality of life from noise
- mitigate and minimise other adverse impacts on health and quality of life from noise
- where possible, contribute to improvements to health and quality of life through the effective management and control of noise".

7.12.5 The NPPF at paragraph 198 identifies decisions should "*mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life"* which is similar to NPS EN-1 paragraph 5.12.17. It also adds that planning policies and decisions should "*identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason".*

7.12.6 Paragraphs 5.12.13 to 5.12.16 of NPS EN-1 set out national planning policy requirements with respect to mitigation. This states that, in considering mitigation measures, the hierarchy approach for the consideration of noise impacts should be adopted. It also refers to the need for due regard to be had to the Noise Policy Statement for England (NPSE) (DEFRA, 2010), the NPPF (Department of Levelling Up, Housing and Communities, 2024) and NPPG (Ministry of Housing, Communities and Local Government, 2016) with regard to noise mitigation. By applying the hierarchy approach this ensures compliance with these policies and guidance.

7.12.7 In applying the hierarchy approach to considering potential impacts upon noise, the NPSE (DEFRA, 2010) sets out definitions for significant adverse effects and adverse effects. This is described as:

- Lowest Observed Adverse Effect Level (LOAEL) – the level above which, as an average response, adverse effects on health and quality of life can be detected; and
- Significant Observed Adverse Effect Level (SOAEL) – the average response level above which, as an average response, significant adverse effects on health and quality of life occur.

7.12.8 The NPSE clarifies that where the impact associated with noise lies between the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL), that "*all reasonable steps should be taken to mitigate and minimise effects."*

7.12.9 NPS EN-5 paragraph 2.10.9 also expects applicants to consider a range of mitigation measures for noise and vibration impacts including positioning of lines, maintenance of conductors and selection of quieter plant.

7.12.10 In terms of decision making, NPS EN-5 paragraphs 2.11.7 and 2.11.8 require the SoS to ensure with respect to noise and vibration "*that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted".* It states "*noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable".*

7.12.11 Section 15 of the NPPF sets out policies for 'Conserving and enhancing the natural environment', including noise pollution (paragraphs 187, 198). Given the policies in this section are similar to those in NPS EN-1 above, they are not repeated here.

### Local planning policy

7.12.12 SCLP Policy SCLP10.3 (Environmental Quality) (East Suffolk Council, 2020) requires that development proposals protect environmental quality by minimising pollution and contamination, addressing impacts on air quality, soils, land contamination, water quality, light pollution, and noise, and should seek improvements in these areas, considering the cumulative effects of development.

7.12.13 TLP Policy SE06 (Noise Pollution) (Thanet District Council, 2020) states noise-sensitive developments in high-noise areas will be permitted only if adequate mitigation is provided, and developments generating significant noise must include a scheme to minimize impacts; proposals causing unacceptable noise impacts will not be allowed.

## Assessment Conclusions

7.12.14 **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. The assessments consider temporary impacts from noise and vibration during the construction stage, including construction traffic noise and vibration, as well as the decommissioning phase. The assessment considers operational noise from the proposed Saxmundham Converter Station and Friston Substation in Suffolk and the proposed Minster Converter Station and Substation in Kent. Operational traffic noise and operational noise from overhead lines and underground cables have not been assessed due to the likely low level noise generation from these aspects of the Proposed Project. The Noise Sensitive Receptors (NSR) that have been considered in the assessments are shown in **Application Document 6.4.2.9.1 Suffolk Noise and Vibration Baseline** and **Application Document 6.4.3.9.1 Kent Noise and Vibration Baseline**.

7.12.15 There are several sources of noise and vibration during construction. The nature and duration of the works varies with a combination of relatively short duration works and long duration works at fixed stationary locations, and intermittent linear works. As discussed in Section 4.5 above, weekend and bank holiday working is proposed. Night time works are not proposed as standard during the construction phase however there may be instances where night time working is required and therefore this has been assessed as a worst-case scenario.

7.12.16 The assessments conclude that significant residual adverse effects from noise generated by the Proposed Project upon noise sensitive receptors during construction can be avoided through the use of standard mitigation in the form of Best Practice Measures (BPM). As set out in the Outline Noise and Vibration Management Plans (**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent)**, further detailed construction noise and vibration assessments would also be undertaken by the contractor prior to commencing works The outcome of these detailed assessments would include details of specific mitigation measures for each activity which would then be implemented to reduce noise levels.

7.12.17 The majority of the construction activities are not expected to generate significant levels of vibration; however, activities that may generate significant levels of vibration include ground compaction and percussive or vibratory piling. Without additional mitigation potential vibration levels are predicted to exceed the SOAEL at two NSR within Kent and at six NSRs within Suffolk due to compaction activities associated with the construction of access routes. Two NSRs in Suffolk are also predicted to exceed the SOAEL due to compaction activities associated with the construction of access routes and underground cable construction. However, the duration of exceedance would be expected to be relatively short (typically a single day) and is therefore considered to be minor and not significant. In addition, BPM would be employed to reduce vibration levels as far as practicable. The assessment therefore concludes that construction vibration would therefore cause a minor effect at these NSR which is not significant.

7.12.18 There is one high sensitivity NSR in the vicinity of Kent Onshore Scheme proposed works; namely the Great Oaks Small School. A small magnitude impact is predicted at this receptor. However, an alternate threshold of 5 dB below the SOAEL has been applied to this receptor following discussions with the local authority. Construction noise levels are predicted to not exceed 5 dB below the SOAEL, without mitigation, and as such the effects of construction noise would not be significant.

7.12.19 During construction, there would be additional vehicle traffic (including heavy goods vehicles) on the local road network, travelling to and from the construction sites. The assessments indicate that construction traffic noise impacts are negligible on all routes and therefore effects from construction traffic at all NSR are not significant.

7.12.20 The effects of decommissioning activities are expected to be similar or less than those during construction. No significant adverse effects are therefore anticipated during the decommissioning phase.

7.12.21 The assessment of operational noise for the Suffolk Onshore Scheme and Kent Onshore Scheme concludes that with appropriate noise mitigation measures in the design (e.g. plant selection, and transformer noise enclosures), the impact of operational noise from the proposed Saxmundham Converter Station, proposed Minster Substation and Minster Converter Station on all nearby NSR, has been assessed as having a small magnitude impact, during both daytime and night-time periods, taking account of the noise context. This would result in negligible to minor adverse effects at all nearby NSR, which is assessed as not significant. Noise and vibration effects from routine and more substantial maintenance activities would be mitigated through the use of BPM and may be supported by detailed noise and vibration assessment, if applicable

7.12.22 Regarding the proposed Friston Substation, there are no sources of operational noise (such as transformers) during the normal operation of the substation. Operational noise during the normal operation of the proposed Friston Substation would therefore be negligible and not significant. At the request of East Suffolk Council assessments of operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines have also been conducted. The assessments are included in **Application Document 6.3.2.9.E Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative).** These assessments indicate that operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines would be not significant.

7.12.23 No significant adverse effects are therefore identified during the operational and maintenance phase.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.12.24 The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.

7.12.25 The construction mitigation measures proposed include:

- Construction working will be undertaken within the agreed working hours set out within the DCO.
- Construction traffic routes, access tracks, and construction haul routes will be surveyed for damage and irregularities (e.g. potholes) that may lead to vibration from construction traffic.
- The contractor will conduct detailed construction noise and vibration assessments to determine whether additional measures, including site-specific BPM, may be required.
- Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where practicable.
- Members of the community and local businesses will be kept informed regularly of the works through active community liaison.

7.12.26 These measures and other controls are set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP, Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and Outline Noise and Vibration Management Plans (**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent).** Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6, Schedule 3 of **Application Document 3.1 Draft DCO**.

7.12.27 It is also noted that the duration of any construction noise and vibration effects and construction traffic noise effects are considered to be temporary, short term, and leaving no permanent residual effect once the works are complete. This would also be the case for decommissioning.

7.12.28 The Proposed Project accords with noise related policies in NPS EN-5 regarding substations and overhead lines. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Kent Onshore Scheme as levels of noise are likely to be low.

7.12.29 With the mitigation measures proposed and good design implemented, the three aims of paragraphs 5.12.17 of NPS EN-1 are met along with relevant policies of NPS EN-3, NPS EN-5, NPSE (DEFRA, 2010) the NPP (Department of Levelling Up, Housing and Communities, 2024) (Department of Levelling Up, Housing and Communities, 2024) and relevant local planning policies regarding the effective management and control of noise from the Proposed Project.

7.12.30 Overall, the Proposed Project is considered to be in accordance with national and local policies with regard to the acceptability of noise and vibration impacts.

## 7.13 Socio-Economics, Recreation and Tourism

### Planning Policy Context

#### National Planning Policy

7.13.1 Section 5.13 of NPS EN-1 (DESNZ, 2024) sets out the socio-economic considerations for energy projects. Paragraph 5.13.2 of NPS EN-1 requires applicants to undertake an assessment of socio-economic impacts at local or regional levels as part of the ES.

7.13.2 NPS EN-1 paragraph 5.13.4 sets out the scope of matters which the applicant's socio-economic assessment within the ES should consider, stating that it may include details on *"the creation of jobs and training opportunities*", "*the contribution to the development of low-carbon industries*", "*any indirect beneficial impacts for the region*", "*effects (positive and negative) on tourism and other users of the area*", "*the impact of a changing influx of workers*" during the different phases of the project, and cumulative effects.

7.13.3 Applicants are required under paragraph 5.13.5 of NPS EN-5 (DESNZ, 2024) to describe the existing socio-economic conditions in the area(s) surrounding a proposed development and how the project's socio-economic impacts correlate with local policy. Paragraph 5.13.6 of NPS EN-1 (DESNZ, 2024) explains that socio-economic impacts may be linked to other impacts, for example the visual impact of a development, which may impact on tourism and local business. Paragraph 5.13.10 of NPS EN-1 explains the SoS may conclude that "*limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)".*

7.13.4 Paragraphs 5.13.8 and 5.13.11 of NPS EN-1 set out that the decision maker should consider "*whether mitigation measures are necessary to mitigate any adverse socio-economic impacts*" and any legacy benefits that may arise, respectively.

7.13.5 Paragraph 5.13.12 of NPS EN-1 adds that an "*employment and skills plan detailing arrangements to promote local employment and skills development opportunities…*" may be included as a requirement if the SoS wishes.

7.13.6 NPS EN-1 paragraph 5.11.30 also sets out policy requirements with respect to PRoW recognising that PRoWs are important recreational facilities for example for walkers, cyclists and horse riders. It states that appropriate mitigation measures to address adverse effects on PRoW should be taken and opportunities to improve or create new access should be considered. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.

7.13.7 Section 2 of the NPPF covers ‘Building a strong and competitive economy’, section 8 relates to ‘Promoting healthy and safe communities’ which covers impacts to PRoW. Key advice on open space, sports and recreation facilities, PRoW and Local Green Spaces is also provided in the NPPG. Given the policies and guidance are similar to those set out in NPS EN-1 above, they are not repeated here.

### Local Planning Policy

7.13.8 SCLP Policy SCLP6.1 (Tourism) (East Suffolk Council, 2020) states the Council will manage tourism to protect attractive features and support local facilities, favouring proposals that enhance the visitor experience and accommodate increased tourism; developments should be assessed for their impact on environmental policies and local management solutions may be introduced to address tourism-related issues.

7.13.9 SCLP Policy SCLP 3.4 (Proposals for Major Energy Infrastructure Projects) notes that any proposals for major energy infrastructure projects must maximise economic and community benefits where feasible, through agreement of strategies in relation to employment, education and training opportunities for the local community.

7.13.10 TLP Policy E10 (Thanet’s Beaches) (Thanet District Council, 2020) sets out that development proposals on major holiday beaches are supported for recreational and tourist facilities, subject to heritage and nature conservation policies; intermediate beaches may have small-scale tourism developments, while undeveloped beaches will prioritise preserving their natural state with new developments generally not permitted.

7.13.11 The Saxmundham Neighbourhood Plan policy SAX6 (Saxmundham Town Council , 2023): Public Rights of Way states that existing PRoW should be protected and enhanced to promote walking and cycling.

## Assessment conclusions – Suffolk Onshore Scheme

7.13.12 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** provides an assessment of the likely effects on socio-economics, recreation and tourism that could arise from the construction, operation and decommissioning of the Suffolk Onshore Scheme.

7.13.13 The Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff, with an average of 86 gross direct FTE jobs estimated to be required onsite per annum over the construction period. Of the average 86 gross direct FTE staff, it is expected that 30% of the workforce will be sourced from the study area used for the assessment (60 minute travel area), resulting in 26 FTE jobs per annum for residents within the study area during the five year construction phase. Further to this, it is expected that the temporary annual employment generated by the Suffolk Onshore Scheme accounting for leakage, displacement and multiplier effects would support, on average, 65 total net jobs per annum during the construction phase. Of these, 20 jobs per annum would be expected to be taken up by residents in the study area.

7.13.14 During construction there would be sufficient capacity to accommodate the construction workforce within a 60-minute drive time from the Order Limits leading to negligible effects on the accommodation sector in Suffolk. Similarly, there would be a negligible effect on local healthcare facilities as there is sufficient FTE GPs to accommodate the additional construction workforce as patients.

7.13.15 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** calculates the total Gross Value Added (GVA) arising from

the construction phase of the Suffolk Onshore Scheme. Using the GVA per worker in the construction sector in the East of England (£62,895) and applying that to the average net employment generated by the Suffolk Onshore Scheme, it is estimated that the construction work would generate approximately £4.1 million to the national economy, with £1.3 million would likely be within the 60 Minute Drive Time Catchment Area. Due to the size of GVA generation associated with the Suffolk Onshore Scheme relative to the East of England Region GVA, this impact has been assessed as being of minor beneficial effect.

7.13.16 During the construction phase, 16 PRoW will need to be either temporarily diverted or closed. The effects on PRoW during construction will be short term and will be managed by National Grid through measures set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk**. The Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15). Whilst PRoW diversions are required, these have been designed to minimise additional journey distances, re-join existing routes and improve route connectivity. These PRoW will be managed through measures set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk.** The Proposed Project has also prepared an illustrative masterplan (**Application Document 7.10 Coordination Document, Appendix A NGV Coordination Masterplan**) demonstrating how up to three converter stations could be developed at the Saxmundham Converter Station Site, taking account of the likely phasing of works and the location of construction compounds, and the potential strategy for the retention of PRoW. Therefore, the Proposed Project is sited to minimise adverse or repeated impacts on the PRoW network.

7.13.17 The effects of the Suffolk Onshore Scheme on PRoW will have negligible to minor adverse effects that will impact recreational routes around Suffolk. These effects are not deemed significant due to the temporary nature of the works and the proposed mitigation measures set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk**. There will be no effect on private, community and tourism assets arising from the construction, operation or decommissioning of the Suffolk Onshore Scheme.

7.13.18 In the event that the Suffolk Onshore Scheme is decommissioned, the workforce required for decommissioning of the assets would be lower than the number required during construction. Therefore, it is considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

7.13.19 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** concludes that with embedded mitigation and control management measures, there is considered to be no likely significant adverse socio-economic, recreation and tourism effects expected as a result of the Suffolk Onshore Scheme.

## Assessment conclusions – Kent Onshore Scheme

7.13.20 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** provides an assessment of the likely effects on socio-economics, recreation and tourism that could arise from the construction, operation and decommissioning of the Kent Onshore Scheme.

7.13.21 The Kent Onshore Scheme will require a peak workforce of 241 FTE staff, with an average of 67 gross direct FTE jobs estimated to be required onsite per annum over the construction period. Of the average 67 gross direct FTE staff it is expected that 30% of

the workforce will be sourced from the study area, resulting in 20 FTE jobs per annum for residents within the study area during the construction phase. Further to this, it is expected that the temporary annual employment generated by the Kent Onshore Scheme accounting for leakage, displacement and multiplier effects would support, on average, 50 total net jobs per annum during the construction phase. Of these, 15 jobs per annum would be expected to be taken up by residents in the study area. As such, the Kent Onshore Scheme is expected to result in short-term temporary minor beneficial socio-economic effects.

7.13.22 During construction there would be sufficient capacity to accommodate the workforce within a 60-minute drive time from the Order Limits leading to negligible effects on the accommodation sector in Kent.

7.13.23 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** calculates the total Gross Value Added (GVA) arising from the construction phase of the Kent Onshore Scheme. Using the GVA per worker in the construction sector in the South East (£72,671) and applying that to the average net employment generated by the Kent Onshore Scheme, it is estimated that the construction work would approximately generate £3.5 million to the national economy, with £1.1 million would likely be within the 60 Minute Drive Time Catchment Area. Due to the size of GVA generation associated with the Kent Onshore Scheme relative to the Study Area GVA, this impact has been assessed as being of minor beneficial effect.

7.13.24 During the construction phase, 9 PRoW will need to be either diverted or closed. The effects on PRoW during construction will be temporary and will be managed through measures set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent**. In terms of PRoW, there will be no permanent PRoW closures/ diversions associated with the Kent Onshore Scheme during the operational phase. The effects on the Kent Onshore Scheme on PRoW are considered negligible to minor adverse and not significant due to the temporary nature of construction works and managed mitigation measure set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent**.

7.13.25 Great Oaks Small School has the potential to be impacted by induced severance resulting from diverting the existing UKPN OHL. The proposed works would be undertaken during school holidays and/or at a time agreed with the school, so as to avoid any effects on vulnerable users. As a result, no significant effects are anticipated.

7.13.26 Two local businesses fall within the Kent Onshore Scheme Order Limits, namely St Augustine's and Stonelees Golf Clubs, both of which could experience land use impacts. The golf clubs are considered to experience minor adverse effects, given the permanent but infrequent, access requirements. Two other local businesses, Chai Stop Takeaway and Kent Waterjet Cutting, do not fall within the Order limits but are expected to experience severance effects from the trenching of the existing UKPN OHL along Jutes Lane. Both businesses will only be temporarily impacted (1 week) and alternative access arrangements will be agreed, leading to a temporary negligible effect.

7.13.27 In the event that the Kent Onshore Scheme is decommissioned, the workforce required for decommissioning of the assets would be lower than the number required during construction. Therefore, it is considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

7.13.28 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** concludes that with appropriate embedded mitigation, there are no likely significant adverse socio-economic, recreation and tourism effects

expected as a result of the Kent Onshore Scheme. There would be minor beneficial effects as a result of the employment generation and GVA, but again these would not be significant.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.13.29 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** assess the socio economic, tourism and recreation effects of the Proposed Project in accordance with NPS EN-1 (DESNZ, 2024) paragraphs 5.13.2 and 5.13.4.

7.13.30 The assessments conclude that there are likely to be socio-economic beneficial effects on employment through direct employment of construction workers and additional net employment in other sectors, during the construction phase accounting for leakage, displacement and multiplier effects. Further to this, the estimated GVA per worker during the construction phase is expected to contribute to minor beneficial effects to both the national and regional economy.

7.13.31 Social infrastructure, local accommodation facilities and local businesses are assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism**. Great Oaks Small School, St Augustine's and Stonelees Golf Clubs, and Chai Stop Takeaway and Kent Waterjet Cutting are expected to be impacted during the construction of the Kent Onshore Scheme. However, the effects are considered negligible to minor adverse due to the proposed mitigation measures and temporary and infrequent nature of the works. No other significant effects are expected to impact any other recreational or tourist facilities and therefore the Proposed Project is compliant with local policies, SCLP6.1 (Tourism) of the SCLP (East Suffolk Council, 2020) and Policy E10 (Thanet's Beaches) of TLP (Thanet District Council, 2020).

7.13.32 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** assess the likely impacts of the Suffolk Onshore Scheme and Kent Onshore Scheme on PRoW. It is expected that there will be some negligible to minor adverse effects on PRoW as a result of construction. In accordance with paragraph 5.11.30 of NPS EN-1 (DESNZ, 2024), mitigation and management measures have been devised to avoid and/or reduce the adverse effects on PRoW, which are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent**. In addition, National Grid has sought to avoid future PRoW disturbance with the siting of the Saxmundham Converter Station. **Application Document 7.10 Coordination Document** Appendix A NGV Coordination Masterplan demonstrates how up to three converter stations could be developed, taking account of the likely phasing of works and the location of construction compounds, and the strategy for the retention of PRoW. This accords with the Saxmundham Neighbourhood Plan policy SAX6.

7.13.33 The Suffolk Onshore Scheme and Kent Onshore Scheme have been designed in accordance with paragraphs 5.13.8 and 5.13.11 of NPS EN-1, as the mitigation hierarchy has been followed, as far as practicable, to, in the first instance, avoid or reduce socio-economic, recreation and tourism impacts and effects through the process of design development. This has included:

- Sensitive routing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economic, recreation and tourism receptors;
- Utilising trenchless methods at landfall to minimise potential impacts on walking/cycling routes.

7.13.34 An additional commitment in the **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** includes trenching works for utilities associated with the Kent Onshore Scheme to be undertaken during the school holidays or as agreed with Great Oaks Small School to avoid impacts on users of this receptor.

7.13.35 In response to NPS EN-1 paragraph 5.13.12 and SCLP Policy SCLP 3.4 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 given the number of construction workers anticipated, and that National Grid has not identified any likely significant effects in relation to construction employment.

7.13.36 Further control and management measures have also been included to mitigate any adverse socio-economic, recreation and tourism effects. Such measures which include traffic control measures are set out in **Application Document 7.5.3.1 Outline Onshore CEMP, Appendix A Outline CoCP**.

7.13.37 Overall, the Suffolk Onshore Scheme and Kent Onshore Scheme are considered to be in accordance with national and local policies with regard to the acceptability of socio-economic, recreation and tourism impacts.

## 7.14 Open Space

### Planning Policy Context

#### National Planning Policy

7.14.1 Section 5.11 of NPS EN-1 (DESNZ, 2024) sets out policies for land use, including open space, green infrastructure and Green Belt.

7.14.2 As per Footnote 246 of NPS EN-1, open space is "*defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. However, in applying the policies in this section* [5.11 of NPS EN-1]*, open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.*"

7.14.3 Paragraph 5.11.9 of NPS EN-1 states that "*Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, Applicants should refer to the Green Infrastructure Framework*."

7.14.4 Paragraph 5.11.24 of the NPS EN-1 (DESNZ, 2024) sets out "*Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is*

*maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes* ".

7.14.5 Paragraph 5.11.32 of the NPS EN-1 stipulates "*The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities."*

7.14.6 There is no supplementary policy or guidance in NPS EN-3 and EN-5 relevant to this topic.

7.14.7 Paragraphs 8(d), 98(a), 103-108, 128(b) of the NPPF and the NPPG for 'Open space, sports and recreation facilities, PRoW and local green space' contain similar policies to NPS EN-1 in relation to open space and are therefore not repeated here.

### Local Planning Policy

7.14.8 SCLP Policy SCLP8.2 asserts *"that there will be a presumption against any development that involves the loss of open space or community sport and recreation facilities. Proposals for development that results in the loss of open spaces will only be permitted in exceptional circumstances where:*

*a) The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit;*

*b) An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses; or*

*c) The loss resulting from the proposed development will be replaced by equivalent or better provision in terms of quantity, quality and in a suitable location."*

7.14.9 TLP Policy SP38 sets out "*The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities.*

*Proposals will be supported that:*

*1) bring forward accessible community services and facilities, including new health facilities;*

*2) safeguard existing community services and facilities;*

*3) safeguard or provide open space, sport and recreation;*

*4) promote healthier options for transport including cycling and walking;*

*5) improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops;*

*6) create social interaction and safe environments through mixed uses and the design and layout of development;*

*7) create greener neighbourhoods and improve biodiversity and access to nature."*

7.14.10 Policy APN2 of the Ash Neighbourhood Plan states "*Development proposals that result in the loss of local green spaces or result in any harm to their character, setting, accessibility, appearance, or general quality or amenity value will not be supported.*"

## Assessment conclusions and appraisal

7.14.11 This assessment only addresses the impact of the Proposed Project on open space from a planning policy perspective and does not consider open space from the perspective of special category land, which is dealt with in **Application Document 4.2 Statement of Reasons**.

7.14.12 The Order Limits have been designed to avoid built development and proposed development allocations, in adopted and emerging local plans, including designated and identified open space.

7.14.13 In accordance with paragraph 5.11.9 of NPS EN-1, which states, '*applicants will need to consult the local community on their proposals to build on open space, sports or recreational facilities, to substitute for any losses as a result of their proposal*', and in accordance with requirements of the 2008 Act, National Grid undertook multistage pre-application consultations, allowing consultees several opportunities to provide feedback as the proposals evolved. Details of the relevant consultation are set out in **Application Document 5.2 Consultation Report**.

7.14.14 National Grid has undertaken a detailed assessment of the land within, or adjacent to, the Kent and Suffolk Onshore Schemes Order Limits, to determine whether it is open space (as defined in Footnote 246 of NPS EN-1).

7.14.15 There are two areas of open space within the Suffolk Onshore Scheme Order Limits and four areas of open space within the Kent Onshore Scheme Order Limits which fall within the definition of open space under Footnote 246. Table 7.1 and Table 7.2 below set out the potential for these open spaces to experience land use changes as a result of the Proposed Project in Suffolk and Kent respectively. The open spaces assessed in respect of the Suffolk and Kent Onshore Scheme Order Limits are shown in Appendix E Figures 10 and 11.

7.14.16 Given the definition in Footnote 246 of NPS EN-1, PRoW and recreational routes could also be regarded as open space. These are assessed in Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism.** As explained in these chapters, there will be no loss of PRoW and recreational routes. Where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project, in accordance with paragraph 5.11.25 and 5.11.32 of NPS EN-1.

7.14.17 If the loss of open space is proposed, then in accordance with Paragraph 5.11.32 of NPS EN-1, the assessment must consider if any LPA or independent assessment identified whether the space was surplus to requirements. Alternatively, if the space is not considered surplus, then the assessment must consider whether the benefits of the project (including need) outweigh the loss of part of the existing space when taking into account any compensatory land proposed. As evidenced in Tables 1 and 2 below, the issue of surplus land is not engaged.

7.14.18 The Proposed Project has taken a precautionary approach to the identification of potential open space given the definition in NPS EN-1 footnote 246. There will be no material impact or loss to the function or use of the spaces identified in Suffolk and

Kent, or PRoW and recreation routes therefore, no further assessment is required. This is evidenced by the assessment presented at Table 7.1 and Table 7.2 .

7.14.19 Whilst there might be some short-term disturbance during construction this will be temporary and there will be no material permanent impact or loss to the area of open space.

7.14.20 Overall, there will be no loss and no increased demands or impacts on open spaces as a result of the operation of the Proposed Project and, therefore, the NPS policy and local policies relating to impact on open space provision are not engaged. Subsequently, there is no need to consider whether the open space in question is surplus to requirements or provide compensatory land as per the national and local policy requirements .

## Table 7.1 Open Space Assessment - Suffolk

| Site | Location in relation to Order Limits | Purpose and Use of Open Space | Assessment of the impact of the project on the open space | Loss? |
|---|---|---|---|---|
| River Fromus | Within | Running Water and surrounding floodplain | A permanent bridge will be required over the River Fromus to deliver the proposed permanent access route. There are two options with regards to the proposed bridge over the River Fromus, as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and set out in Section 10.5. In both scenarios, the construction of the bridge will not require land take from the open space, and the River Fromus is not used for recreational activities, such as fishing or mooring. Hence, the NPS open space paragraphs are not engaged and no further assessment is required. | No |
| Aldeburgh Beach | Within | The beach area along Thorpe Road, to the north of Aldeburgh, is publicly accessible and can support a range of recreational activities. | The Order Limits for the Suffolk Onshore Scheme will go through these open spaces. In this location, the Order Limits are required for the Suffolk Landfall, which marks the transition point from the underground HVDC cable to marine HVDC cable. The cable would be laid underground using a trenchless technique. Any impact as a result of this would be temporary in nature and not lead to a change in the integrity of the open space. Therefore it is not considered that the Proposed Project would materially impact on the function or use of the open spaces. Hence, the NPS open space paragraphs are not engaged and no further assessment is required. | No |

## Table 7.2 Open Space Assessment - Kent

| Site | Location in relation to Order Limits | Purpose and Use of Open Space | Assessment of the impact of the project on the open space | Loss? |
|---|---|---|---|---|
| The River Stour | Within | Running water and surrounding floodplain | A temporary bridge structure will span across the River Stour for the duration of the construction period. The public right of navigation along the River Stour will be temporarily stopped-up/closed for one to five days whilst the bridge is lifted into place and secured. The bridge will be designed so that once in place the river remains navigable. Any impact as a result of this would be temporary in nature and not lead to a change in the integrity of the open space. Hence, the NPS open space paragraphs are not engaged and no further assessment is required. | No |
| Pegwell Bay Country Park | Adjacent | Pegwell Bay Country Park is part of the Sandwich and Pegwell Bay National Nature Reserve and comprises a play area, picnic spot and a main path for coastal walks and bike rides. | Pegwell Bay Country Park is located to the south of the Kent Landfall, adjoining (and outside) the Order Limits. As the site is located outside of the Order Limits, it is not considered that the Proposed Project would materially impact on the function or use of this space. Hence, the NPS open space paragraphs are not engaged and no further assessment is required. | No |
| St Augustine's Golf Course | Within | St Augustine's Golf Course is located to the south of Cliffsend, on the western edge of Sandwich Road. It is open to paying members and visitors and as such, it is not publicly accessible. However, adopting a precautionary approach to the definition of open space, and | Part of the golf course will be located within the Kent Onshore Scheme, at the Kent Landfall. It is proposed to locate the Transition Joint Bay (TJB) where the offshore cable will be jointed to the onshore cable, within the golf course. As this will be installed underground, it is not considered | No |

| Site | Location in relation to Order Limits | Purpose and Use of Open Space | Assessment of the impact of the project on the open space | Loss? |
|---|---|---|---|---|
| | | having particular regard to the visual amenity aspect of the definition of open space, the golf course has been considered as potential open space. | that the Proposed Project would materially impact on the function or use of this space and there is no loss in the use or function of this space. Hence, the NPS open space paragraphs are not engaged and no further assessment is required. | |
| Stonelees Golf Centre | Within | Stonelee's Golf Centre is located to the south of St Augustine Golf Course, at the intersection of Sandwich Road and Ebbsfleet Lane. It is open to paying members and visitors and as such, it is not publicly accessible. However, adopting a precautionary approach to the definition of open space, and having particular regard to the visual amenity aspect of the definition of open space, the golf course has been considered as potential open space. | The Order Limits will cut across the Stonelee's Golf Centre and St Augustine's Golf Course, to provide for a permanent field access from Ebbsfleet Lane to the onshore underground HVDC cable route. The field access will follow existing tracks wherever possible and may be used by vehicles to conduct maintenance of the underground cables during the construction and operation phases and will be used on an infrequent basis. However, it is not considered that this would materially impact on the function or use of this space and there is no loss in the use or function of this space. Hence, the NPS open space paragraphs are not engaged. | No |
| Ramsgate Hoverport | Within | Previously developed site (former Ramsgate hovercraft terminal), comprising areas of hardstanding, connected via PRoW TR33 to the Viking Ship Hugin tourist attraction and settlement of Cliffsend. Adopting a precautionary approach to the definition of open space, the former hoverport site has been considered as a potential open space. | The Order Limits will cut across the hoverport site to provide access from Sandwich Road during construction and for maintenance during operation, utilising existing track and hardstanding. Access during operation to undertake maintenance works would be infrequent (maintenance works are anticipated on an annual basis with a maximum of two work vehicles and a trailed quad bike per visit). | No |

| Site | Location in relation to Order Limits | Purpose and Use of Open Space | Assessment of the impact of the project on the open space | Loss? |
|---|---|---|---|---|
| | | | Therefore it is not considered that this would materially impact on the function or use of this space and there is no loss in the use or function of this space. Hence, the NPS open space paragraphs are not engaged. | |

## 7.15 Health and Wellbeing

### Planning Policy Context

#### National Planning Policy

7.15.1 Paragraphs 4.4.1 and 4.4.2 of NPS EN-1 (DESNZ, 2024) set out that energy infrastructure has the potential to impact on the health and well-being of the surrounding population. Potential direct impacts including "*increased traffic, air or water pollution, dust odour, hazardous waste and substances, noise, exposure to radiation and increases in pests".* Paragraph 4.4.3 also adds "*New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity."*

7.15.2 Paragraphs 4.4.4 and 4.4.5 of NPS EN-1 sets out how the applicant should assess the potential impact of the projects on human health within the ES. This includes "*identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate*", in isolation and cumulatively with other developments where appropriate.

7.15.3 NPS EN-1 paragraph 4.4.7 recognises that the aspects of energy infrastructure most likely to have a detrimental impact on the population are subject to their own separate regulation, that will result in effective mitigation of them. Therefore, "*it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008*".

7.15.4 As discussed in section 7.12 above, paragraph 5.12.17 of NPS EN-1 directs the SoS "*to refuse consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise*:

- avoid significant adverse impacts on health and quality of life from noise
- mitigate and minimise other adverse impacts on health and quality of life from noise
- where possible, contribute to improvements to health and quality of life through the effective management and control of noise."

7.15.5 NPS EN-5 paragraph 2.10.11 (DESNZ, 2024) states "*The Applicant should consider the following factors: […]that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise effects of EMFs; and any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines."*

7.15.6 There is no supplementary policy or guidance in NPS EN-3 relevant to this topic.

7.15.7 Paragraphs 8(b), 96(c), 98, 103, 135, 198, 223(f) and 224(b) of the NPPF and the NPPG for 'Healthy and safe communities' and 'Open space, sports and recreation facilities, public rights of way and local green space' contain similar health and wellbeing policies to the NPS and are therefore not repeated here.

#### Local Planning Policy

7.15.1 SCLP Policy SCLP11.2 (Residential Amenity) (East Suffolk Council, 2020) states the Council will assess development proposals based on their impact on privacy, outlook,

daylight, noise, physical relationships with other properties, light spillage, air quality, and safety, ensuring that developments provide adequate living conditions and do not unacceptably harm the amenity of existing or future residents. Policy SCLP3.4 (Proposals for Major Energy Infrastructure Projects) also seeks to ensure that proposals for major energy infrastructure deliver positive outcomes for the local community and surrounding environment and have regard to community safety and cohesion.

7.15.2 SP2 (Planning for healthy and inclusive communities) of the DDLP (Dover District Council, 2024), sets out how the Council will support the creation of healthy, inclusive and safe communities in the district.

7.15.3 TLP Policy QD03 (Living Conditions) (Thanet District Council, 2020) requires all new development "*not to lead to unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure".*

## Assessment conclusions

7.15.4 **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** provide assessments of the likely effects on health and wellbeing that could result from construction, operation and decommissioning of the Suffolk Onshore Scheme and Kent Onshore Scheme. The assessments consider the impacts of the Proposed Project on various determinants of health and wellbeing and draw upon the suite of environmental assessments provided in the ES.

7.15.5 The following potential impacts are considered:

- Access to healthcare services
- Access to open space, leisure and play
- Air quality
- Noise and vibration
- Transport modes, access, connections and physical activity
- Employment and income
- Social cohesion and community identity.

7.15.6 With appropriate mitigation and management measures in place, there will be no significant effects on health and wellbeing resulting from the above impacts during the construction, operation and maintenance, and decommissioning phases of the Suffolk Onshore Scheme and Kent Onshore Scheme.

7.15.7 Likely effects on health and wellbeing during construction would be temporary in nature. During the construction phase, the Suffolk Onshore Scheme and Kent Onshore Scheme are expected to generate an average of 86 and 67 gross direct FTE jobs respectively, as well as an average of 65 and 50 net additional jobs respectively. The temporary additional jobs would represent local job growth, which would result in a temporary minor beneficial effect (not significant) on health and wellbeing.

7.15.8 Due to additional employment from the construction of the Suffolk Onshore Scheme and Kent Onshore Scheme, there is expected additional pressure on healthcare services and facilities. The additional employment impacting, access to healthcare facilities as a result of the Kent Onshore Scheme, is considered negligible (not significant) effect. This is due to the GPs still accepting registrations, the construction workforce only

accounting for 0.2% of the population in the area used for the assessment, and the impact is only temporary. As for the additional employment generated by the Suffolk Onshore Scheme, it is determined not to have a significant effect on access to healthcare facilities as the average patient per GP is below the national average.

7.15.9 There is potential for severance effects arising during the construction phase, impacting residents' ability to access open space. Taking into account the residual effects assessment results of **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,** there are no roads that would experience a significant effect in terms of severance; there is also not likely to be any significant effects regarding fear and intimidation, after consideration of traffic flow, speed, proportion of HGVs and the proximity of traffic to people during construction of the Suffolk Onshore Scheme and Kent Onshore Scheme. Therefore, the likely effect on health and wellbeing arising from impacts on accessing open space, leisure, and play facilities during the construction phase is assessed to be not significant.

7.15.10 During the operational and maintenance phases, there would be no significant effects on open space designations (including access) and on PRoW or recreational routes (as demonstrated in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**). Due to the limited number of operatives manning the site and only infrequent additional trips to site, no severance impacts are expected on any receptors during this phase. Therefore, the likely effect on health and wellbeing arising from impacts on accessing open space, leisure and play facilities, and from transport, access and connection impacts, during the operational and maintenance phase, is assessed to be not significant.

7.15.11 The likely effect on health and wellbeing arising from social cohesion and community impacts during the operational phase of the Proposed Project is assessed to be not significant, on the basis that no traffic flow and severance impacts are expected to any receptors and there are no permanent effects on residential properties that would affect the social environment and community cohesion. It is noted that the Suffolk and Kent Onshore Schemes would result in a small number of significant effects on landscape and visual receptors (according to **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual and Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**) and local amenity may be affected due to the reduced enjoyment of the affected areas by recreational and residential users.

7.15.12 The likely effect on health and wellbeing arising from noise and vibration impacts during the operational and maintenance phase of the Suffolk and Kent Onshore Schemes is assessed to be not significant. Routine operational maintenance is not expected to generate high levels of noise or vibration and would generally be relatively short-term. Where more substantial operation and maintenance activities are required the contractor would undertake detailed noise and vibration assessments and determine best practical means to reduce the effects of noise and vibration at nearby noise sensitive receptors.

7.15.13 The likely effect on health and wellbeing arising from air quality impacts during the operational and maintenance phase is assessed to be not significant due to limited changes in particulate concentrations. There would be no significant effects from the substations backup generator emissions or from vehicle emissions generated by the Suffolk Onshore Scheme or Kent Onshore Scheme (due to the limited number of operatives and infrequent vehicle trips).

7.15.14 Consideration of visual effects of light pollution during construction and operation is presented in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline** and **Assessment and Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment**. As explained in these documents, associated lighting at the Saxmundham Converter Station and the Minster Converter Station and Substation would be on for occasional and short periods of time during the operational phase.

7.15.15 If this should occur, the impacts of the decommissioning phase would be the same as, and not greater, than those of the construction phase.

7.15.16 Electromagnetic Fields from overhead lines are unlikely to have significant environmental effects and was therefore scoped out of the EIA. The design of the Proposed Project is compliant with the International Commission on Non-Ionizing Radiation Protection guidelines (1998) in ensuring that the threshold for impacts to humans is not met or exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public electric and magnetic fields (EMF) exposure limits.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.15.17 In accordance with paragraphs 4.4.4 and 4.4.5 of NPS EN-1 (DESNZ, 2024), **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** have identified potential adverse health impacts and measures to avoid or reduce these impacts. The Suffolk Onshore Scheme and Kent Onshore Scheme have been designed to follow the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control and reduce the impact on health and wellbeing are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC,** which will require the contractor(s) to undertake regular site inspections to check conformance to Management Plans, in relation to dust, waste, water and noise during construction.

7.15.18 Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**, including:

- TT03: all designated PRoWs crossing the working area will be managed with access only closed for short periods while construction activities occur.
- GG10: any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance will be located away from sensitive receptors such as residential properties or ecological sites where practicable.

7.15.19 As demonstrated in section 7.12 above, effective management and control of noise will be in place to avoid or minimise significant adverse impacts on health and quality of life from noise, in line with paragraph 5.12.17 of NPS EN-1.

7.15.20 **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** conclude that with appropriate mitigation measures, there will be no significant adverse effects on human health and wellbeing. The Suffolk Onshore Scheme and Kent

Onshore Scheme are therefore compliant with national policy, with regard to the acceptability of health and wellbeing impacts. It is also concluded that the impacts of the Suffolk Onshore Scheme and Kent Onshore Scheme from noise, air quality, light pollution and on community safety and cohesion will not unacceptably harm living conditions and residential amenity, in line with local planning policy.

## 7.16 Cumulative Effects

### Planning Policy Context

#### National Planning Policy

7.16.1 Paragraph 4.1.5 of NPS EN-1 (DESNZ, 2024) confirms that in weighing up the impacts and benefits of a proposed development, the SoS will also need to take into account:

*"its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term wider benefits*

*its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".*

7.16.2 Paragraph 4.2.12 of NPS-EN-1 relates to the applicant's consideration of residual impacts stating that "*the cumulative impacts of multiple developments with residual impacts should also be considered."*

7.16.3 Paragraph 4.3.3 of NPS EN-1 requires applicants to provide an assessment of the likely significant effects of a proposed development, in accordance with the requirements of the EIA Regulations, including any cumulative effects.

7.16.4 Paragraph 4.3.19 of NPS EN-1 with respect to decision making states that:

*"The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place".*

7.16.5 Section 4.4 of NPS EN-1 sets out policy on the consideration of health with respect to energy proposals stating at paragraph 4.4.5 that:

*"The impacts of more than one development may affect people simultaneously, so the applicants should consider the cumulative impacts on health in the ES where appropriate".*

7.16.6 Section 5 of NPS EN-1 includes policies for the consideration of cumulative impacts with respect to flood risk (paragraphs 5.8.15 and 5.8.32), the historic environment (paragraphs 5.9.9), landscape and visual effects (paragraph 5.10.6), socio-economic impacts (paragraph 5.13.4), traffic and transport effects (paragraph 5.14.21), and impacts on water quality and resources (paragraph 5.16.7).

7.16.7 Paragraph 2.8.72 of NPS EN-3 (DESNZ, 2023) sets out that the "*Assessment of environmental effects of transmission infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure*."

7.16.8 NPS EN-5 (DESNZ, 2024) reiterates the policy positions of NPS EN-1 (DESNZ, 2024) confirming the need to consider cumulative impacts within the ES and this being an overall consideration as part of the planning balance exercise.

7.16.9 Paragraphs 50(a), 116, 165(a), 171, 198, 199 and 223(f) of the NPPF contain similar cumulative impact policies to the NPS and are therefore not repeated here. There is no supplementary policy or guidance in the NPPG relevant to this topic.

### Local Planning Policy

7.16.10 SCLP Policy SCLP3.4 (Proposals for Major Energy Infrastructure Projects) (East Suffolk Council, 2020) requires proposals for major energy infrastructure projects to ensure that *"cumulative impacts of projects are taken into account and do not cause significant adverse impacts".*

## Assessment Conclusions - Suffolk Onshore Scheme

7.16.11 National Grid has worked closely with developers of other projects proposed in the area to coordinate in a way that reduces the cumulative impact of the projects on the environment and local communities. **Application Document 7.10 Coordination Document** reports on how the projects have worked together throughout development of the project; including a prepared masterplan for the Saxmundham Converter Station site. The approach has been informed by extensive consultation, including being shaped by the views of LPAs and communities in Suffolk who requested that infrastructure be co-located to reduce the area affected by the projects. This has been achieved through colocation of Friston Substation with substations for the EA1N and EA2 projects; and colocation of the Saxmundham Converter Station on a site with sufficient space to accommodate the LionLink and Nautilus projects, should they be progressed in the area.

7.16.12 **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects** and **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** assess the intra- and inter- project cumulative effects, of the Suffolk Onshore Scheme. Intra-cumulative effects refer to where a single receptor is affected by more than one source of effect arising from the Proposed Project, whereas inter-cumulative effects arise where there is the potential for two or more developments that are reasonably foreseeable and/ or consented but not yet forming part of the baseline environment and within close enough proximity to the Proposed Project to lead to significant cumulative effects on the same receptor.

7.16.13 Intra-project cumulative effects and inter-project cumulative effects resulting from the Suffolk Onshore Scheme have been assessed in accordance with the methodology set out in **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Effects Methodologies.**

### Intra-project Cumulative Effects

7.16.14 Significant adverse intra-project cumulative effects were identified in the assessment presented in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects** for the following receptors:

- In respect to residential receptors, for Friston scenario 2 (in the situation where National Grid build Friston Substation under the Sea Link DCO) the intra-project

cumulative effect is judged to be significant during construction and decommissioning. This is due to visual amenity effects being assessed as significant along with additional noise effects which, albeit expected to be minor, may impact the same receptors.

- For transport users, there is potential for a significant intra-project cumulative effect during construction, operation and decommissioning phases as several visual amenity effects were assessed as significant for people using cycle paths, roads and rail and there will be several temporary and permanent PRoW diversions and closures. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor, the combination of all these impacts could have a significant adverse effect upon transport users.
- In respect of users of PRoW, there is potential for a significant intra-project cumulative effect to occur during construction and decommissioning on PRoW users of Footpaths 260/017/0, 491/005/0, 491/006/0 and Bridleway 491/010/0 as changes to user experience and local travel patterns were assessed as moderate adverse, visual amenity effects were assessed as either moderate or major adverse and the PRoW may also be subject to minor adverse traffic and transport effects.
- Similarly, there is potential for a significant intra-project cumulative effect to occur during construction and decommissioning on PRoW users of Bridleway 354/002/0 as visual amenity effects were assessed as minor adverse, changes to user experience and local travel patterns were assessed as moderate adverse and the PRoW may also be subject to minor adverse traffic and transport effects**.**

7.16.15 In summary, with the exception of transport users which will experience a significant intra-project effect during operation also, significant intra-project effects of the Suffolk Onshore Scheme are anticipated to occur during the construction and decommissioning phases only and are therefore temporary.

### Inter-project cumulative effects

7.16.16 A summary of the residual significant Inter-Project cumulative effects of the Suffolk Onshore Scheme, as set out in **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 13 Onshore Scheme Inter-Project Cumulative Effects**, are as follows:

- Landscape and Visual
  - During construction, several potential significant adverse inter-project effects have been identified. The Suffolk Coast and Heaths AONB, SCT03 Nearshore Waters, Suffolk Heritage Coast, LCAs L1 and K3 and viewpoints 6, 7, 8 and 22 will experience a likely significant landscape and visual effect due to sequential construction of the Suffolk Onshore Scheme with the East Anglia ONE North & East Anglia TWO Offshore Windfarms. The Proposed Project is also predicted to have significant cumulative effects with the LionLink Offshore Interconnector on LCA L1, SCT03 Nearshore Waters and visual amenity for viewpoints 1-7, 15-17, and 19-21. LCA B4, L1 and 01 as well as several viewpoints may also experience a likely significant effect from the construction of the Suffolk Onshore Scheme and South Saxmundham Garden Neighbourhood. These effects are also anticipated during decommissioning.

- A likely significant effect on BMV land is predicted due to the combined effects of: the Suffolk Onshore Scheme, EAN1 and EA2 Windfarms, Croft Farm land and buildings, and South Saxmundham Garden Neighbourhood.
- During operation, there is a likely significant effect anticipated for viewpoint 6 from the Suffolk Onshore Scheme with East Anglia One North & East Anglia Two Offshore Windfarms. There would also likely be a significant cumulative effect with LionLink Interconnector on LCA L1 and viewpoints 1-7, 15-17 and 19-21.
- Considering total inter-project cumulative effects i.e. the effects of all of the other developments considered together, there is the potential for significant cumulative effects for a short term and temporary period on the Suffolk Coast and Heaths AONB as a result of the potential simultaneous or sequential construction of the Suffolk Onshore Scheme, Sizewell C main development site, East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector. The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the Suffolk Coast and Heaths AONB has the potential to alter the perception of the AONB with construction of major energy projects becoming a temporary characteristic feature of the landscape. These total cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time.
- Total cumulative effects on LCAs at all project stages have the potential to be significant for LCA L1 (Heveningham and Knodishall Estate Claylands) primarily as a result of EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector developments, although the remaining projects may also contribute in a minor way to the total effect. There would also be total cumulative effects for a temporary and limited duration for LCA K3 (Aldringham and Freston Sandlands) and SCT 03 Nearshore Waters during construction (and decommissioning).
- Total cumulative effects on representative viewpoints have the potential to be significant as a result of the total combined effects primarily from the Suffolk Onshore Scheme with EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector developments for various viewpoints at all project stages.

- Agriculture and Soils
  - There is a likely significant adverse cumulative effect in relation to soils and BMV land as a result of the temporary disturbance and the temporary and permanent loss of BMV land associated with each of the other developments in isolation and the total effect when combined. However, there is no additional mitigation available in relation to the permanent loss of BMV land to that presented in **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk**, and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP.**

7.16.17 In summary, total cumulative effects on LCAs at all project stages have the potential to be significant for LCA L1 (Heveningham and Knodishall Estate Claylands) primarily as a result of East Anglia ONE North & TWO Offshore Windfarms and LionLink Offshore Interconnector developments, although the remaining projects may also contribute in a minor way to the total effect. At all project stages, there would be one representative visual receptor experiencing a permanent significant inter-project cumulative effect as a result of the East Anglia ONE North & TWO Offshore Windfarms at Friston and 13

visual receptors expected to experience a permanent significant inter-project cumulative effect as a result of the LionLink Offshore Interconnector being located at the Saxmundham Converter Station site. All other significant effects are during construction and decommissioning and are therefore short term and temporary. Additionally, there will be a permanent significant inter-project cumulative effect due to the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk**, and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP.**

## Assessment Conclusions – Kent Onshore Scheme

7.16.18 **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Onshore Scheme Inter-Project Cumulative Effects** assess the intra-and inter-project cumulative effects, of the Kent Onshore Scheme. The assessment of intra-project and inter-project cumulative effects resulting from the Kent Onshore Scheme has been assessed in accordance with the methodology set out in **Application Document 6.3.1.5.A Appendix 1.5.A Cumulative Effects Assessment Methodologies**.

### Intra-project Cumulative Effects

7.16.19 The assessment presented in **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects** concludes that there are anticipated to be significant adverse intra-project cumulative effects for the following receptors:

- For Residential receptors, there is likely to be a significant adverse intra-project cumulative effect during construction and decommissioning for those residential receptors which are likely to be subject to minor adverse noise effects as assessed in the Noise and Vibration chapter and where visual amenity effects are also experienced at these same locations.

- For PRoW TE39, there is the likely to be a significant intra-project cumulative effect during construction and decommissioning on PRoW users of TE39 as user experience socio economic effects were assessed as significant and the PRoW may also be subject to minor adverse severance, pedestrian delay and PRoW diversions and closures impacts.

- For PRoW TE37 there is likely to be a significant intra-project cumulative effect during construction and decommissioning on PRoW users of TE37 and the Saxon Shore Way as visual amenity effects were assessed as significant and the regional trail may also be subject to minor adverse socio-economic effects.

7.16.20 In summary, the likely significant adverse intra-project effects for the Kent Onshore Scheme are anticipated to occur during the construction and decommissioning phases and therefore, will be temporary.

### Inter-Project Cumulative

7.16.21 A summary of the significant residual inter-project cumulative effects for the Kent Onshore Scheme, as set out in **Application Document 6.2.3.13 Kent Onshore Scheme Inter-Project Cumulative Effects**, are as follows:

- Landscape and Visual
  - In summary, no significant cumulative effects on landscape and visual receptors are expected from the combined effects of each development in isolation. However, when considering the total potential cumulative effect of all the other developments in Kent combined with the Kent Onshore Scheme, there is the potential for a significant total cumulative effect on LCA E1 Stour Marshes. The concentration of energy related development close to and within Richborough Energy Park whilst occupying the less sensitive part of LCA E1, would have the potential to result in a small and peripheral part of LCA E1 becoming an energy focused landscape, rather than exhibiting characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.
- Agriculture and Soils
  - There is a likely significant cumulative effect in relation to soils and BMV land as a result of the temporary disturbance and the temporary and permanent loss of BMV land associated with each of the other developments in isolation and when combined.
  - However, there is no additional mitigation available in relation to the permanent loss of BMV land to that presented in **Application Document 7.5.10.2 Outline Soil Management Plan- Kent**, and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP.**

7.16.22 In summary, there would be a permanent significant inter-project cumulative effect on LCA E1 Stour Marshes however the industrial setting and proposed mitigation planting will limit the impact. Additionally, there would be a permanent significant cumulative effect as a result of the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.2 Outline Soil Management Plan - Kent**, and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP.**

## Assessment Conclusions – Combined Effects

7.16.23 **Application Document 6.2.5.2 Part 5 Combined Chapter 2 Combined Effects of the Onshore and Offshore Elements of the Proposed Project** presents details of the combined effects of the Proposed Project, i.e.:

- The combined effects of the Suffolk Onshore Scheme and Offshore Scheme, where the schemes are likely to interact in the vicinity of the Suffolk landfall (designated sites, ornithology);
- The combined effects of the Kent Onshore Scheme and Offshore Scheme, where the schemes are likely to interact in the vicinity of the Kent landfall (designated sites, ornithology);
- The combined effects of the Suffolk Onshore Scheme and Kent Onshore Scheme, where the schemes both impact the same national resource (Best and Most Versatile agricultural land).

7.16.24 Ornithology receptors and some designated sites have the potential to be impacted by combined effects from the Suffolk Onshore Scheme and Offshore Scheme, and from

the Kent Onshore Scheme and Offshore Scheme. However, the assessment concludes that these combined effects would not be significant in both cases.

7.16.25 The only shared receptors across the Suffolk Onshore Scheme and the Kent Onshore Scheme is the permanent loss of BMV agricultural land, as there are losses in both Suffolk (11.45 ha) and Kent (12.21 ha). The permanent loss of BMV land amounts to less than 1% of all BMV agricultural land in Suffolk Coastal and Thanet Districts and is therefore not considered significant. No other combined effects of the Suffolk Onshore Scheme and Kent Onshore Scheme were identified.

7.16.26 The assessment of the combined effects of the Proposed Project therefore concludes that these effects would not be significant.

## Appraisal of the Suffolk Onshore Scheme and Kent Onshore Scheme

7.16.27 In accordance with national and local planning policy, an assessment of the cumulative impacts of the Proposed Project has been undertaken to assess whether there are any new significant effects or significant effects of the Proposed Project in isolation are made greater when considering the Proposed Project alongside other developments.

7.16.28 The majority of significant intra-project cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature. For transport users, under the Suffolk Onshore Scheme, there is potential for a significant intra-project cumulative effect during the operational phase too as several visual amenity effects were assessed as significant for people using cycle paths, roads and rail and there will be several temporary and permanent PRoW diversions and closures. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor, the combination of all these impacts could have a significant adverse effect upon transport users.

7.16.29 The combined effects of the Suffolk Onshore Scheme with EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector result in significant inter-project cumulative landscape and visual effects at all project stages. For landscape, the effects are localised with significant effects expected upon one Landscape Character Area (LCA) L1 (Heveningham and Knodishall Estate Claylands) where the converter stations and works for Friston would be located. In terms of visual receptors, at all project stages there would be one representative visual receptor experiencing a significant inter-cumulative effect as a result of the EA1N and EA2 Offshore Windfarms at Friston and 13 visual receptors experiencing a significant inter-cumulative effect as a result of the LionLink Offshore Interconnector.

7.16.30 Significant inter-project cumulative effects are identified for both the Suffolk and Kent Onshore Schemes with regard to the loss of BMV land. Management plans set out in **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk, Application Document 7.5.10.2 Outline Soil Management Plan - Kent**, and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP** would manage the loss as far as practicable**.**

7.16.31 For the Kent Onshore Scheme there is the potential for a significant inter-project cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1, which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent

Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.

7.16.32 NPS EN-1 (DESNZ, 2024) acknowledges that most NSIP infrastructure projects will have residual landscape and visual effects. With regard to visual effects, NPS EN-1 paragraph 5.10.13 (DESNZ, 2024) is clear that "*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".* Paragraph 5.10.14 then goes on to state that the SoS *"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*". NPS EN-1 paragraph 5.10.12 confirms that whilst local landscape designations are important that these should not be used to refuse consent since they will unduly restrict acceptable development. This is important context given the Proposed Project is identified as CNP, meaning there is a presumption that the urgent need for such infrastructure will typically outweigh these types of residual effects.

7.16.33 The landscape and visual inter-project cumulative effects in Suffolk are partly as a result of National Grid coordinating with other projects. As discussed in **Application Document 7.10 Coordination Document**, NPS EN-1, NPS EN-3 and NPS EN-5 advocate the importance of coordination when considering the location and route of onshore and offshore transmission infrastructure. National Grid has therefore considered the possibility of co-locating converter stations, sharing cable corridors and consolidating landfalls as part of the exploration of coordination with other projects. In addition to policy, this has also been in response to feedback from Suffolk County Council and East Suffolk Council. This type of coordination has been proposed with EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector at the Friston Substation and the Saxmundham Converter Station Site.

7.16.34 In order to reduce the potential spread of infrastructure through other parts of Suffolk's rural environment, the Proposed Project has sought opportunities to concentrate development in a single area. There is also potential for sharing some elements of infrastructure, such as temporary and permanent access, and allows for shared mitigation in the future. Therefore, although the assessment of inter-cumulative effects has identified significant adverse landscape and visual effects during operation because of these projects in combination with the Proposed Project, these effects are localised and reduce the geographical extent of impacts of multiple projects if co-location had not been proposed.

7.16.35 Taking into account the principles set out in NPS EN-1 (DESNZ, 2024) paragraphs 4.2.16 and 4.2.17, the substantial public benefits and need for the Proposed Project (as described on Section 5 of this Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments) clearly and demonstrably outweigh the significant adverse cumulative effects identified in the assessments.

# 8. Planning Appraisal of the Offshore Scheme

## 8.1 Introduction

8.1.1 This Section presents an appraisal of compliance of the Offshore Scheme with the main policy requirements identified following a review of the documents identified in Section 2 of this Planning Statement.

8.1.2 Marine considerations in respect of DCO applications are covered in Section 4.5 of NPS EN-1 (DESNZ, 2024). Paragraph 4.5.8 states that "*Applicants for a Development Consent Order must take account of any relevant Marine Plans and are expected to complete a Marine Plan assessment as part of their project development, using this information to support an application for development consent".* The relevant Marine Plans are identified in Section 2.4 of this Planning Statement. A Marine Policy Assessment (**Application Document 6.13 Marine Policy Assessment**) is submitted with the ES. In addition, Appendix A: NPS Accordance Table and **Appendix B: Marine Plans Accordance Table** of this Planning Statement set out an analysis of compliance of the Proposed Project against relevant policies NPSs EN-1, EN-3 (DESNZ, 2024) and EN-5 (DESNZ, 2024) and those of the Marine Policy Statement (MPS) (H.M Government, 2011), the East Inshore and East Offshore Marine Plan (DEFRA, 2014) and the South East Offshore Marine Plan (DEFRA, 2021), respectively. The appraisal considers the construction, operation and decommissioning of the Proposed Project.

8.1.3 The NPSs do not include specific policies in relation to the marine elements of energy projects although references are made to marine elements in different sections of the NPSs, for example, Section 2.8 of NPS EN-3 which relates to offshore wind developments.

8.1.4 Therefore, where the NPSs remain silent on the marine elements of projects, these have been assessed in this Planning Statement in terms of how they accord with the MPS and the East Inshore and East Offshore Marine Plan and South East Offshore Marine Plan.

8.1.5 The application for development consent is accompanied by an ES which meets the requirements of Section 4.2 of NPS EN-1 (see Section 1.5 of this Planning Statement on the EIA). The following topic chapters from the ES relevant to the Offshore Scheme and are used as the basis to assess the Proposed Project's accordance with NPS EN-1, EN-3 and EN-5, the MPS, the East Inshore and East Offshore Marine Plans and the South East Offshore Marine Plans:

- **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**
- **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**
- **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology**

- **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**
- **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**
- **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries**
- **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users**
- **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects**
- **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**

8.1.6 Where relevant, Local Plan policies and the NPPF have been considered and the Proposed Project's compliance against them is assessed in the appraisal below. It is noted that the NPPF predominantly relates to terrestrial development.

## 8.2 Physical Environment

### Planning Policy Context

#### National Planning Policy

8.2.1 Paragraph 5.6.11 of NPS EN-1 (DESNZ, 2024) sets out a requirement for the ES to include an assessment of the effects on the coast, in particular "*the impact of the proposed project on coastal processes and geomorphology, including by taking into account of potential impacts from climate change"*. The paragraph goes on to state that *"if the development will have an impact on coastal processes, the applicant must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast."*

8.2.2 With regard to decision-making, the SoS *"should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and decommissioning period"* (paragraph 5.6.16). It is also made clear in paragraph 5.6.17 that the SoS should not consent *"new development in areas of dynamic shorelines where the proposal could inhibit sediment flow or have an adverse impact on coastal processes at other locations"*.

8.2.3 Section 2.8 of NPS EN-3 (DESNZ, 2024) provides additional guidance regarding the potential impacts of offshore transmission infrastructure. Paragraph 2.8.111 sets out how the construction, operation and decommissioning of offshore energy infrastructure (including installation of cable routes) can have indirect effects on the physical offshore environment. The subsequent paragraphs (2.8.112 to 2.8.114) advise applicants on the contents of their assessments in relation to these effects on the physical environment.

8.2.4 Section 14 of the NPPF relates to 'Meeting the challenge of climate change, flooding and coastal change'. Given the similarity to the policies set out in NPS EN-1 and EN-3 above, the NPPF policies are not repeated here.

#### Marine Policy Statement and Marine Plans

8.2.5 The MPS (H.M Government, 2011) does not include a chapter specifically addressing the physical offshore environment. However, Section 2.6.8 covers coastal change and flooding and highlights that these risks are *"major consideration in ensuring that*

*proposed new developments are resilient to climate change over their lifetime"* (paragraph 2.6.8.1).

8.2.6 Paragraph 2.6.8.6 encourages marine plan authorities to *"seek to minimise and mitigate any geomorphological changes that an activity or development will have on coastal processes, including sediment movement".*

8.2.7 Policies of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) relevant to offshore physical processes include:

- Policy CC1: "proposals should take account of how they might be impacted upon by, and respond to, climate change over their lifetime (…)."
- Policy ECO1: "cumulative impacts affecting the ecosystem of the East marine plan and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation".

8.2.8 Policies of the South East Inshore Marine Plan (DEFRA, 2021) relevant to offshore physical processes include

- Policy SE-CC-22: "proposals in the south east marine plan areas should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change".
- Policy SE-MPA-4: "proposals that may have significant adverse impacts on designated geodiversity must demonstrate that they will, in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts so that they are no longer significant".

### Local Planning Policy

8.2.9 Policies relevant to physical processes in the SCLP (East Suffolk Council, 2020) include:

- Policy SCLP9.3 (Coastal Change Management Area): this policy permits essential infrastructure in the Coastal Change Management Area only where no other sites outside of the Area are feasible and there is a management plan in place to manage the impact of coastal change.
- Policy SCLP10.1 (Biodiversity and Geodiversity): this policy requires proposals that will have the potential to impact on a SAC, SPA or Ramsar site to be supported by information to inform a Habitat Regulations Assessment.

8.2.10 Policies relevant to physical processes in the TLP (East Suffolk Council, 2020) include:

- Policy CC03 (Coastal Development): this policy applies to new development proposed within 40 m of the coastline and requires a demonstration that it will no accelerate coastal erosion (amongst other things).
- Policy GI01 (Protection of Nationally Designated Sites and MCZs): this policy does not support development which would materially harm a SSSI, National Nature Reserve or MCZ.

## Assessment conclusions

8.2.11 **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** presents information about the environmental assessment of the potential physical processes effects that could result from the construction, operation and decommissioning of the Offshore Scheme

8.2.12 The physical processes baseline conditions have been established by undertaking a combination of desktop review of published information and the collection of project-specific survey data, in line with the requirements set out in NPS EN-3. This has included a sediment transport model to assess sediment dispersion distances associated with different types of cable burial techniques (**Application Document 6.3.4.1.A Appendix 4.1.A Suspended Sediment Modelling**).

8.2.13 Potential impacts assessed for the construction phase (preparation of route cable and cable installation) include:

- Changes to seabed morphology and bedforms
- Coastal geomorphological change and associated changes to sediment transport regimes
- Changes to nearshore seabed morphology at the landfalls, and beach morphology including Pegwell Bay to Hacklinge Marshes SSSI and The Haven (Local Nature Reserve and SSSI)
- Increased Suspended Sediment Concentration (SSC) in the water column.

8.2.14 Potential impacts assessed for the operation and maintenance phase include:

- Changes to seabed morphology and increased SSC
- Coastal geomorphological change and associated changes to sediment transport regimes
- Offshore scour of the seabed
- Discharges, leaks and spills from vessels, including loss of oils.

8.2.15 Following the completion of the operational phase, the decommissioning phase will take place. As this work is planned decades into the future, it is unknown what the exact methodology will be for decommissioning, as this will be based on the best available technology available at the time of decommissioning (**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**). Any impacts from the Decommissioning phase activities involved in cable removal, will be the same as those carried out during the construction phase. The effects of these impacts are predicted be to be either the same or less than the impacts associated with the installation and operation phase.

8.2.16 With the implementation of the design mitigation and management measures, the assessment concludes that the residual effects resulting from the Proposed Project on offshore physical processes during construction, operation and maintenance and decommissioning, are small or negligible, therefore not significant in EIA terms.

## Appraisal of Offshore Scheme

8.2.17 As required by paragraph 5.6.11 of NPS EN-1 (DESNZ, 2024), the Proposed Project has assessed its potential impacts on coastal processes and geomorphology, including

by taking into account of potential impacts from climate change. Coastal processes were assessed at a regional and local scale in association with both landfall sites using sediment transport studies, recent erosion studies, beach and seabed and elevation data and the information provided in shoreline management plans. This analysis was used to establish the potential of the Proposed Project to coastal and nearshore morphological change and coastal processes.

8.2.18 Mitigation measures have been incorporated into the project design to reduce the physical processes effects of the Proposed Project so that they are not likely to be significant. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP.**

8.2.19 The assessment set out in **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** reports a moderate (significant) effect during the operational lifetime of the Proposed Project from coastal geomorphological changes due to the effects of climate change. The future baseline described in Section 1.7 of **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** accounts for how the effects of climate change and the associated effects of sea level rise and increased storminess may alter the landfall sites. Further information is provided on how the effects of climate change are considered within the Proposed Project, see **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change.**

8.2.20 All other impacts were assessed as resulting in effects that are not predicted to be significant on physical processes receptors, including seabed morphology, coastal geomorphology and associated sediment transport regimes, water quality and water column.

8.2.21 On the basis of the above, it is concluded the Proposed Project would not have any adverse effects on physical processes and complies with the relevant policies of NPS EN-1, NPS EN-3 (DESNZ, 2024), East Inshore and East Offshore Marine Plans (DEFRA, 2014), South East Inshore Marine Plan (DEFRA, 2021) and local planning policy.

## 8.3 Marine Ecology and Biodiversity

### Planning Policy and Legislative Context

#### Relevant Legislation

#### The Natural Environment and Rural Communities Act 2006 (HM Government, 2006)

8.3.1 Section 41 of the Natural Environment and Rural Communities Act 2006 (‘the NERC Act’) requires the listing of habitats and species that are of principal importance for the conservation of biodiversity, including those that have been identified as priorities within the UK Biodiversity Action Plan (UK BAP).

8.3.2 The NERC Act requires that the Section 41 list be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act ‘to have due regard’ to the conservation of biodiversity when carrying out their normal functions.

## Decisions Regulations

8.3.3 Regulation 3A of the Decisions Regulations (HM Government, 2010) (set out in Section 2 of this Planning Statement) sets out that the Secretary of State must have regard to the need to protect the environment, the need to protect human health, and the need to prevent interference with legitimate uses of the sea, including fishing.

## National Planning Policy

8.3.4 Section 4.6 of NPS EN-1 (DESNZ, 2024) sets out policies relating to environmental and biodiversity net gain. Paragraph 4.6.3 indicates that "*currently biodiversity net gain policy in England only applies to terrestrial and intertidal components of projects",* adding that *"there are provisions in the Environment Act 2021 to allow Marine Net Gain to be made mandatory for NSIPs in the future".* At present BNG is not mandatory for terrestrial or marine NSIPs.

8.3.5 Section 5.4 of NPS EN-1 covers biodiversity and geological conservation. Paragraph 5.4.4 of NPS EN-1 states that "*the highest level of biodiversity protection is afforded to sites identified through international conventions*" and refers applicants to the Habitats Regulations, which sets out the sites for which a HRA is required. Applicants are advised to provide the SoS with the relevant information to determine whether an HRA Appropriate Assessment is required (paragraph 5.4.25).

8.3.6 Paragraph 5.4.7 of NPS EN-1 recognises that many SSSIs are also sites of international importance and affords those SSSIs that are not covered by an international designation, a high level of protection. Paragraph 5.4.8 states that "*development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted*". This is unless the benefits, including need, of the development outweigh both its likely impact on the SSSI and any broader impacts on the national network of SSSIs.

8.3.7 Paragraph 5.4.9 of NPS EN-1 sets out that if a proposal is likely to have significant impacts on an MCZ, an MCZ Assessment should be undertaken as per the requirements under Section 126 of the Marine and Coastal Access Act 2009 (H.M Government, 2009).

8.3.8 Marine Protected Area (MPA) is a term used to describe the network of habitat sites, SSSIs, MCZs, and Highly Protected Marine Areas. Paragraph 5.4.11 highlights that *"equal consideration of the effect of proposals should be given to all MPAs regardless of the legislation they were designated under. This is because all sites contribute to the network of MPAs and therefore to overall network integrity*."

8.3.9 Paragraph 5.4.17 of NPS EN-1 requires applicants to clearly outline any effects on internationally, nationally and locally designated sites of ecological and geological conservation importance, protected species, and habitats of principal importance for conservation. Applicants should demonstrate, as per Paragraph 5.4.19, how their projects conserve and enhance biodiversity and geological conservation interests, with paragraph 5.4.35 adding that they *must include appropriate avoidance, mitigation, compensation, and enhancement measures as an integral part of the proposed development*."

8.3.10 Paragraph 5.4.42 of NPS EN-1 outlines the general principle that "*development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests"* and "*Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures*

*should be sought*." Paragraph 5.4.43 goes on to state that "*If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm."* Similarly, paragraph 2.2.10 of EN-5 (DESNZ, 2024) stipulates electricity infrastructure proposals must account for preserving natural beauty and conserving important natural features, as mandated by the Electricity Act 1989 (H.M Government, 1989). Paragraph 2.14.2 states that *"applicants should demonstrate how environmental, community and other impacts have been considered and how adverse impacts have followed the mitigation hierarchy i.e. avoidance, reduction and mitigation of adverse impacts through good design; how the mitigation hierarchy has been followed, in particular to avoid the need for compensatory measures for coastal, inshore and offshore developments affecting SACs SPAs, and Ramsar sites".* A similar policy (SE-DIST-1) in contained within the South East Inshore Marine Plan (DEFRA, 2021).

8.3.11 Similar policy tests to those in NPS EN-1 are set out in NPPF paragraphs 192 to 195 and are therefore not repeated here.

### Marine Policy Statement and Marine Plans

8.3.12 The MPS (H.M Government, 2011) ensures that marine resources are used in a sustainable way by ensuring biodiversity is protected and conserved by using the precautionary principle and relying on sound evidence. Paragraph 2.6.1.3 establishes the general principle that "*development should aim to avoid harm to marine ecology, biodiversity and geological conservation interests (including geological and morphological features), including through location, mitigation and consideration of reasonable alternatives".*

8.3.13 Key policies of the East Inshore and East Offshore Marine Plan (DEFRA, 2014), with regard to biodiversity, are Policies BIO1 and BIO2. Policy BIO1states that *"Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial)."* Policy BIO2 adds that "*where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests*."

8.3.14 Policy MPA1 of the East Inshore and East Offshore Marine Plan seeks to ensure that any impacts on the overall Marine Protected area network is taken into account of in strategic level measures and assessments.

8.3.15 Key policies of the South East Inshore Marine Plan (DEFRA, 2021) with regard to biodiversity are Policies SE-BIO1, SE-BIO-2, and SE-BIO-3. Policy SE-BIO-1 states:

*"Proposals that enhance the distribution of priority habitats and priority species will be supported.*

*Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:*

*a) avoid*

*b) minimise*

*c) mitigate - adverse impacts so they are no longer significant*

*d) compensate for significant adverse impacts that cannot be mitigated."*

8.3.16 Similar policies are set out within Policy SE-BIO-2 in relation to impacts on native species or habitat adaptation or connectivity, or native species migration Policy SE-FISH-3 sets out a similar policy with regards to essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes. Policies SE-MPA-1 to SE-MPA-4 of the South East Inshore Marine Plan relate to the consideration of impacts on Marine Protected Areas.

### Local Planning Policy

8.3.17 Policy SCLP10.1 (Biodiversity and Geodiversity) of the SCLP (East Suffolk Council, 2020) sets out that development which would harm a local wildlife site will not be supported unless the benefits of the project outweigh the harm caused. The policy also identifies the need for surveys if protected or Suffolk priority species are present, identifies the need for Habitats Regulations Assessment where SACs and SPAs are involved, and sets out the mitigation hierarchy of avoid-mitigate-compensate. Policy SP30 of the TLP (Thanet District Council, 2020) (Biodiversity and Geodiversity Assets) similarly sets out that *"Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority."*

8.3.18 Policy SP28 of the TLP (Thanet District Council, 2020) states that "*Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in-combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2017 (as may be amended). Where possible applicants should incorporate measures to avoid or mitigate any adverse impacts. Where, despite all possible avoidance and mitigation measures being put in place, a proposal is still shown to have an adverse effect on the integrity of an International site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.*"

## Assessment conclusions

### Overview

8.3.19 This Section provides an overview of the assessments of likely significant effects resulting from the Offshore Scheme during its construction and operation and maintenance phases in relation to the following topics:

- Benthic ecology
- Fish and shellfish
- Marine mammals
- Ornithology.

8.3.20 The Offshore Scheme is designed for a lifespan of approximately 40 to 60 years. Following the completion of the operational phase, the decommissioning phase will take place. As this work is planned decades into the future, it is unknown what the exact methodology for decommissioning will be, since it will be based on the best available technology at the time. All the above assessments conclude that during the decommissioning phase, impacts may be of a similar magnitude to those of construction

phase activities and therefore, these impacts are not discussed further in the following paragraphs.

### Benthic Ecology

8.3.21 **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology** presents information about the environmental assessment of the likely significant benthic ecological effects that could result from the Proposed Project.

8.3.22 The Suffolk landfall is located on the coast, between Aldeburgh and Thorpeness. Trenchless techniques will be used under the transition zone between the onshore and offshore elements, with the entry/exit point located entirely in the subtidal environment. Therefore, there will be no direct impacts to intertidal benthic ecology receptors at this location.

8.3.23 The Kent landfall is located at Pegwell Bay within the Sandwich Bay to Hacklinge Marshes SSSI. This site is designated for the protection of a range of habitats, such as dunes and coastal grasslands above the marine environment, and saltmarsh and mudflats in the intertidal environment. As with the Suffolk landfall, a trenchless solution, such as HDD, will be employed at the landfall and will avoid the saltmarsh habitat entirely. The entry/exit point will be located within the intertidal zone.

8.3.24 The key sites designated for the protection of benthic features within the benthic ecology study area (a 17 km wide area from the Offshore Scheme centre line) comprise:

- four SACs: Southern North Sea SAC (located partially within the Offshore Scheme), Thanet Coast SAC (located partially within the Offshore Scheme), Sandwich Bay SAC Margate (located partially within the Offshore Scheme) and Long Sands SAC (located outside the Offshore Scheme but within the ecology study area)
- two SPAs: Outer Thames Estuary SPA, Thanet Coast and Sandwich Bay SPA (both located partially within the Offshore Scheme)
- four MCZs: Orford Inshore MCZ (located outside the Offshore Scheme but within the ecology study area), Kentish Knock East MCZ (located outside the Offshore Scheme but within the ecology study area), Thanet Coast MCZ (located less than 1 km from the Offshore Scheme) and Goodwin Sands MCZ (located partially within the Offshore Scheme)
- three SSSIs: Leiston-Aldeburgh SSSI (located partially within the Offshore Scheme), Thanet Coast SSSI, Sandwich Bay to Hacklinge Marshes SSSI (located partially within the Offshore Scheme).

8.3.25 These are shown on **Figure 6.4.4.2.1 Benthic Ecology Study Area and relevant designated sites**.

8.3.26 Impacts to SACs and SPAs are detailed in **Application Document 6.6 HRA Report** and impacts to MCZs are covered in **Application Document 6.11 Marine Conservation Zone Assessment.**

8.3.27 The benthic ecology receptors taken for consideration in the appraisal comprise a range of benthic habitats that are listed as habitats of conservation importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act or Annex I of the Habitats Directive:

- Sandbanks which are slightly covered by seawater all the time

- Communities on circalittoral rock
- Subtidal sands and gravels
- Blue mussel beds
- Intertidal mudflats.

8.3.28 Potential impacts assessed for the construction phase are:

- Temporary physical disturbance to habitats and species (the total area of temporary disturbance from the Offshore Scheme is estimated to be 3.07 $km^2$).
- Temporary increase in SSC and sediment deposition leading to increased turbidity and smothering effects and possible contaminant mobilisation.
- Changes to marine water quality during cable installation and cable lay from the use of drilling fluids.
- Underwater sound impacts on marine invertebrates.

8.3.29 Potential impacts assessed for the operation and maintenance phase include:

- Direct loss of benthic habitats and species due to placement of hard substrates on the seabed: placement of protection measures such as rock berms, rock backfill or concrete mattresses will be required at some locations of the seabed (the total estimated area of permanent loss of habitat of 0.15 $km^2$).
- Introduction and spread of Invasive and Non-Native Species (INNS) via the addition of cable protection.
- Effects from thermal emissions from the heat produced by the subsea cable.
- Effects from Electromagnetic Fields (EMF) emissions from the subsea cable.

8.3.30 The assessment concludes that no likely significant effects on benthic ecology receptors from the above impacts have been identified during the construction, operation and decommissioning of the Proposed Project, with the implementation of embedded mitigation set out in Section 2.8 of **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology.**

### Fish and Shellfish

8.3.31 **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish** presents information about the environmental assessment of the likely fish and shellfish effects that could arise from the Proposed Project.

8.3.32 There are several fish and shellfish species known to be present in the study area (50 km from the Offshore Scheme) that are protected under international and national conservation legislation. These include European eel, Atlantic salmon, sandeel and European smelt.

8.3.33 There are four designated sites for the protection of fish and shellfish located within the study area for fish and shellfish (50 km from the Offshore Scheme). These are all MCZs designated for the protection of blue mussel or native oyster beds:

- Goodwin Sands MCZ (located partially within the Offshore Scheme)
- Thanet Coast MCZ (located less than 1 km from the Offshore Scheme)
- Dover to Deal MCZ (located approximately 12 km from the Offshore Scheme)

- Medway Estuary MCZ (located approximately 42 km from the Offshore Scheme).

8.3.34 There are no SACs designated for fish or shellfish within the study area.

8.3.35 Further detail on designated sites screened in the Offshore Scheme assessment relevant to fish and shellfish are presented in **Application Document 6.11 Marine Conservation Zone Assessment.**

8.3.36 Species of commercial importance vary along the length of the Offshore Scheme depending on location. Details on commercial fisheries within the Study Area, including information on ports and fishing fleet characteristics, is provided within **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries.**

8.3.37 The fish and shellfish ecology receptors taken for consideration in the assessment are described in Table 3.12 of **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish.** They include:

- Migratory species such as European eel, Atlantic salmon and European smelt
- Pelagic fish species such as herring, sprat and mackerel
- Demersal fish species such as sandeel and cod
- Elasmobranchs
- Shellfish of commercial and/or conversation importance
- General fish, shellfish and cephalopod communities not included above.

8.3.38 Potential impacts taken into consideration for the construction phase include:

- Temporary physical disturbance to fish and shellfish habitat from landfall, route preparation and cable installation activities (the total area of temporary disturbance from the Offshore Scheme is estimated to be approximately 3 $km^2$).
- Temporary increase in SCC and subsequent sediment deposition leading to contaminant mobilisation, increased turbidity and smothering effects on fish and shellfish.
- Underwater sound (excluding UXO).

8.3.39 Potential impacts taken into consideration for the operation and maintenance phase include:

- Permanent loss of fish and shellfish habitat due to placement of hard substrates on the seabed: placement of protection measures such as rock berms, rock backfill or concrete mattresses will be required at some locations of the seabed (the total estimated area of permanent loss of habitat of 0.15 $km^2$)
- Disturbance to fish due to subsea cable EMF emissions
- Potential effects on fish and shellfish due to subsea cable thermal emissions.

8.3.40 The assessment concludes that no likely significant effects on fish and shellfish from the above impacts have been identified during the construction, operation and decommissioning of the Proposed Project, with the implementation of embedded mitigation set out in Section 3.8 of **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish.**

## Marine Mammals

8.3.41 **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** presents information about the environmental assessment of the likely significant marine mammal effects that could result from the Proposed Project.

8.3.42 The baseline studies undertaken as part of the assessment identify harbour porpoise, harbour seal and grey seal as the marine. In the UK, two groups of marine mammals occur: cetaceans (harbour porpoise, bottlenose dolphin, minke whale and white-beaked dolphin are the most common species) and pinnipeds (the two species known to occur in the northeast Atlantic are harbour seal and grey seal). The assessment of baseline conditions considers their conservation status and their abundance/density within proximity to the Offshore Scheme and a wider study area.

8.3.43 Key sites designated for the protection marine mammals and screened in for assessment are:

- Southern North Sea SAC (located partially within the Offshore Scheme)
- Wash and North Norfolk Coast SAC (located outside the Offshore Scheme)
- Humber Estuary SAC (located outside the Offshore Scheme)
- Berwickshire and North Northumberland SAC (located outside the Offshore Scheme).

8.3.44 Only the Southern North SAC is located partially within the Offshore Scheme, passing through a section approximately 70 km long, close to the south-eastern boundary of the site. This site is designated specifically for harbour porpoise. An assessment of impacts to European designated sites is provided in **Application Document 6.6 Habitats Regulations Assessment Report** and **Application Document 6.11 Marine Conservation Zone Assessment**.

8.3.45 Potential impacts on marine mammals assessed for construction include:

- Underwater sound (excluding UXO) generated by construction activities
- Potential for indirect effects through impacts to prey species: construction activities which disturb the seabed or produce underwater sound could impact demersal fish and shellfish species which are prey items for many marine mammals
- Vessel collision risk
- Airbourne sound and visual disturbance
- Reduction in water quality due to discharges and unplanned releases, accidental leaks and spills from vessels.

8.3.46 For the operation and maintenance phase, disturbance to marine mammals from EMF emissions from the subsea cable has been considered.

8.3.47 The assessment concludes that no likely significant effects on marine mammals from the above impacts have been identified during construction, operation and decommissioning with the implementation of the embedded mitigation set out in Section 4.8 of **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals**.

## Ornithology

8.3.48 **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** presents information about the environmental assessment of the likely significant ornithology effects that could result from the Proposed Project.

8.3.49 The Offshore Scheme passes through six sites that are designated nationally or internationally for the protection of birds: Outer Thames Estuary SPA, Thanet Coast and Sandwich Bay SPA, Thanet Coast and Sandwich Bay Ramsar site, Sandwich and Pegwell Bay National Nature Reserve (NNR), Sandwich Bay to Hacklinge Marshes SSSI, and Leiston-Aldeburgh SSSI. A further six sites, in which seabirds and waterbirds (qualifying features) are likely to interact with the Offshore Scheme, are: Minsmere-Walberswick SPA, Minsmere-Walberswick Ramsar site, Minsmere-Walberswick Heaths and Marshes SSSI, Alde-Ore Estuary SPA, Alde-Ore Estuary Ramsar site and Alde-Ore Estuary SSSI.

8.3.50 From the assessment of baseline conditions, the Important Ecological Features (IEFs), i.e. features that are potentially affected by the Offshore Scheme, have been identified (Table 5.15 of **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology).** They include Lesser Black-backed Gull, Herring Gull, Little Tern, Common Tern, Red-throated Diver and Golden Plover.

8.3.51 Potential impacts considered for the construction phase include:

- Disturbance and displacement of birds
- Changes in prey availability
- Alteration of water quality due to increased Suspended Sediment Concentration (SCC) and disturbance of contaminated sediment (around 7,025 $m^3$ of sediment is likely to be disturbed during construction along the entire route of the Offshore Scheme).

8.3.52 Potential impacts considered for the operation and maintenance phase include:

- Disturbance and displacement of birds (from vessels required for maintenance activities)
- Loss and disturbance of seabed habitat used by foraging seabirds and waterbirds (occurring during cable repair)
- Changes in prey availability: the placement of rock protection on the seabed could result in permanent habitat loss of fish and shellfish habitat, leading to a reduction in prey availability for seabirds and waterbirds
- Alteration of water quality due to increased SCC and disturbance of contaminated sediment (likely to occur during maintenance and repair work).

8.3.53 With the embedded mitigation in place as set out in Section 5.8 of this chapter, the assessment concludes that no significant residual effects are expected to occur as a result of the Proposed Project

8.3.54 The cumulative assessment presented in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** has identified the potential for a significant adverse effect to arise on red-throated diver from construction and installation disturbance in combination with other projects. As such, the Proposed Project has committed to a full seasonal restriction (1st November – 31st March) for offshore cable burial 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. With this additional mitigation measure in place, there would be no likely significant effect on red-throated diver.

### Habitats Regulations Assessment (HRA)

8.3.55 To support the Secretary of State with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 Habitats Regulations Assessment Report** has been prepared. The HRA concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity (AoSI) or qualifying features (either alone or in combination with other projects) of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC. No derogation or additional compensation is therefore considered necessary.

### Marine Conservation Zone Assessment

8.3.56 **Application Document 6.11 Marine Conservation Zones Assessment** provides the necessary information to allow the MMO to meet its specific duty for MCZs as outlined in Section126 of the MCAA ( (H.M Government, 2009). Stage 1 of the assessment (screening) was completed for Goodwin Sands MCZ, Thanet Coast MCZ, Kentish Knock East MCZ, Orford Inshore MCZ, Dover to Deal MCZ and Medway Estuary MCZ due to their sites falling within the ZoIs of the following impact pathways:

- Temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only);
- Temporary increase in SSC and deposition;
- Underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only);
- Direct loss of benthic habitats and species (Goodwin Sands MCZ only);
- Disturbance from thermal emissions (Goodwin Sands MCZ and Medway Estuary MCZ only); and
- Effects of EMF emissions (Goodwin Sands MCZ and Medway Estuary MCZ only)
- Decommissioning effects.

8.3.57 The Stage 1 assessment found that these impact pathways are not considered to have significant effects on the designated features or conservation objectives of these MCZs and therefore no Stage 2 assessment is required. Consideration was also given to cumulative and in-combination effects, however, it was concluded that cumulative effects on MCZs are considered highly unlikely. It has therefore been concluded that the conditions of Section 126 of the MCAA (H.M Government, 2009) as determined under Stage 1 of the MCZ assessment process, can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of Proposed Project related activities.

## Appraisal of Offshore Scheme

8.3.58 In line with paragraph 5.4.17 of NPS EN-1 (DESNZ, 2024), the above chapters of the ES set out the effects from the Proposed Project on key designated sites of ecological or geological conservation importance, protected species and habitats and other species of principal importance for the conservation of biodiversity.

8.3.59 Mitigation measures have been embedded in the design of the Proposed Project to ensure that there would be no likely significant adverse effects on benthic ecology, fish and shellfish, marine mammals and ornithology as a result of the construction, operation and maintenance and decommissioning phases of the Offshore Scheme. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP.**

8.3.60 Embedded mitigation measures include:

- Sensitive routeing and siting of infrastructure and temporary works.
- A biosecurity plan to be produced following the latest guidance on INSS.
- Target burial depth (Depth of Lowering (DOL)) of the cable between 1 m to 2.5 m across the route of the Offshore Scheme (subject to local geology and obstructions) to minimise effects to fish caused by EMF.
- Best practice mitigation measures to prevent spillages from occurring and to minimise disturbance of sediments.
- **Application Document 7.8 Red Throated Diver Protocol**: this sets out a range of measures to minimise disturbance to red-throated diver
- **Application Document 7.5.2 Outline Offshore CEMP:** this outlines measures to manage dust, waste, water, noise, vibration and soil during construction.
- **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan**: this highlights overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities on marine mammals.

8.3.61 In addition, as required in paragraphs 5.4.9 and 5.4.25 of NPS EN-1 (DESNZ, 2024), separate reports have been produced which specifically assess the effects of the Offshore Scheme on European sites (**Application Document 6.6 Habitats Regulations Assessment Report**) and MCZ (**Application Document 6.11 Marine Conservation Zones Assessment**), which conclude that there will be no significant effects on these sites resulting from the Proposed Project. No derogations under the (HM Government, 2017) or under section 126(7) of the MCAA (H.M Government, 2009) will therefore be required for the Proposed Project.

8.3.62 The ES demonstrates that the Proposed Project successfully avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases. All residual effects on benthic ecology, fish and shellfish, marine mammals and ornithology from the Proposed Project have been assessed as not significant.

8.3.63 Accordingly, the Proposed Project complies with the requirements of NPS EN-1 (DESNZ, 2024), NPS EN-3 (DESNZ, 2024), East Inshore and East Offshore Marine

Plan (DEFRA, 2014) and South East Inshore Marine Plan (DEFRA, 2021) and the relevant Local Plan policies.

8.3.64 As noted in paragraph 4.2.15 of NPS EN-1, *"where residual non-HRA and non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for"* CNP infrastructure. The presumption in favour of consent for CNP infrastructure therefore applies. Regulation 3A requires the consideration of the need to protect the environment. The ES presented as part of this Application demonstrates how the impact of the Proposed Project upon the environment has been minimised with the application of appropriate mitigation

8.3.65 In accordance with NPS EN-1, NPS EN-5 (DESNZ, 2024), the MPS (H.M Government, 2011), the East Inshore and East Offshore Marine Plan (DEFRA, 2014), South East Inshore Marine Plan and local planning policy, the Proposed Project successfully avoids and/ or mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases.

## 8.4 Marine Archaeology

### Planning Policy Context

#### National Planning Policy

8.4.1 Policies relevant to the historic environment are contained in Section 5.9 of NPS EN-1 (DESNZ, 2024). Paragraph 5.9.9 requires applicants *"to undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground*". A description of the significance of the heritage assets affected by the proposed development should also be provided (paragraph 5.9.10).

8.4.2 Paragraph 5.9.27 states that "*when considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance".*

8.4.3 Paragraph 5.9.28 states that "*any harm or loss of significance affecting any designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification"*.

8.4.4 In cases where substantial harm to a heritage asset would result from a proposed development, paragraph 5.9.31 explains that*: "Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss".*

8.4.5 In cases where harm is less than substantial, paragraph 5.9.32 establishes a lower threshold for the need to demonstrate that the benefits of the Proposed Development outweigh impacts on a designated heritage asset, stating that *"where the proposed*

*development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal (…)".*

8.4.6 Paragraph 5.9.33 states that "*in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

8.4.7 Paragraph 2.8.167 of NPS EN-3 (DESNZ, 2024) explains how the marine historic environment can be affected by offshore transmission development:

- "from direct effects arising from the physical siting of the development itself such as the installation (…) electricity cables, or the siting of plant required during the construction phase of development; and
- from indirect changes to the physical marine environment (such as scour, coastal erosion or sediment deposition) caused by the proposed infrastructure itself or its construction".

8.4.8 Paragraph 2.8.76 of NPS EN-3 states that micro siting provides flexibility to accommodate the discovery of unforeseen archaeology that would be preferable to leave in situ. Whilst paragraph 2.8.172 recognises that knowledge of the historic environment in the inshore and offshore areas is limited, paragraph 2.8.173 requires applicants "*to determine how any known heritage assets might best be avoided"*.

8.4.9 Paragraph 2.8.257 indicates that an outline Written Scheme of Investigation (WSI) covering the entirety of the defined project area and full duration of the project should be submitted with the application.

8.4.10 Paragraph 2.8.177 clarifies that "*Where elements of a proposed project may interact with historic environment features that are located onshore, applicants should assess the effects in accordance with Section 5.9 in EN-1*."

8.4.11 With regards to mitigation, paragraphs 2.8.252 and 2.8.253 recommend the implementation of exclusion zones around known and potential heritage assets, which preclude development activities within their boundaries and help to ensure their protection in situ. Paragraph 2.8.255 states that *"the ability of the applicants to microsite specific elements of the proposed development during construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology".*

8.4.12 With regards to decision-making, paragraph 2.8.325 makes it clear that the SoS should be satisfied that the proposed offshore transmission project has "*appropriately considered and mitigated for any impacts to the historic environment, including both known heritage assets, and discoveries that may be made during the course of development".*

8.4.13 There is no policy or guidance in the NPPF or PPG relevant to marine archaeology specifically. Like NPS EN-1 (DESNZ, 2024), the NPPF (Department of Levelling Up, Housing and Communities, 2024) requires an assessment of harm to the significance of heritage assets affected by a proposed scheme. Both NPS EN-1 and NPPF categorise the level of harm into 'substantial' and 'less than substantial'.

8.4.14 The PPG (Ministry of Housing, Communities and Local Government, 2016), which supports the NPPF, and the NPS provides further narrative on the interpretation of harm including the evaluation of significance.

## Marine Policy Statement and Marine Plans

8.4.15 Section 2.6.6 of the MPS (H.M Government, 2011) relates to the historic environment. Paragraph 2.6.6.7 advises the marine plan authority to *"take into account the particular nature of the interest in the assets and the value they hold for this and future generations. This understanding should be applied to avoid or minimise conflict between conservation of that significance and any proposals for development.*

8.4.16 Policy SOC2 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) states:

"*Proposals that may affect heritage assets should demonstrate, in order of preference:*
*a) that they will not compromise or harm elements which contribute to the significance of the heritage asset*
*b) how, if there is compromise or harm to a heritage asset, this will be minimised*
*c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or*
*d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset."*

8.4.17 Policy SE-HER-1 of the South East Inshore Marine Plan (DEFRA, 2021)states:

"*Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported.*

*Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:*
*a) avoid*
*b) minimise*
*c) mitigate - any harm to the significance of heritage assets.*
*If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets."*

## Local Planning Policy

8.4.18 SCLP Policy SCLP11.3 (Historic Environment) (East Suffolk Council, 2020) states the Council will collaborate to conserve and enhance the historic environment, applying NPPF guidelines to heritage assets, requiring Heritage Impact Assessments and/or Archaeological Assessments for developments affecting these assets, and encouraging pre-application consultations to ensure assessments are adequate.

8.4.19 SCLP Policy SCLP11.7 (Archaeology) (East Suffolk Council, 2020) requires planning applications affecting known or suspected archaeological sites to include an assessment to ensure preservation of significant remains, with preference for in situ preservation; if not feasible, recording and analysis of the remains is required, and archaeological conditions or obligations will be applied as necessary.

8.4.20 Policy SCLP11.6 (Non-Designated Heritage Assets) (East Suffolk Council, 2020) states that applications resulting in harm to the significance of a Non-Designated Heritage Asset will be judged on the balance of the scale of any harm or loss and the significance of the heritage asset.

8.4.21 TLP Policy SP36 (Conservation and Enhancement of Thanet's Historic Environment) (Thanet District Council, 2020) mandates that new developments must protect and enhance Thanet's historic environment, integrating heritage assets into proposals while ensuring their long-term conservation.

8.4.22 TLP Policy HE01 (Archaeology) (Thanet District Council, 2020) ensures that archaeological sites are adequately assessed and protected, with necessary measures taken to record and preserve their findings during development.

8.4.23 TLP Policy HE03 (Heritage Assets) (Thanet District Council, 2020) requires that proposals that affect both designated and non-designated heritage assets, will be assessed by reference to the scale of harm, both direct and indirect, or loss to, he significance of the heritage asset in accordance with the criteria in the NPPF.

## Assessment conclusions

8.4.24 **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely marine archaeological effects that could arise from the Proposed Project. The study area on which the assessment is based comprises the extent of the Offshore Scheme, as defined by the Order Limits up to MHWS (and illustrated on **Figure 6.4.4.6.1 Marine archaeological study area)**. There are no designated sites or known sites of prehistoric date, no maritime or aviation sites subject to statutory protection and no coastal or intertidal sites subject to statutory protection within the study area. There are also no known records of aircraft crash sites within the study area.

8.4.25 However, known and potential palaeogeography and prehistoric artefacts, seabed features including maritime and aviation sites and associated artefacts, intertidal and coastal heritage assets, and the historic seascape character of the region have been identified within the study area and have the potential to be adversely/beneficially impacted by the Proposed Project.

8.4.26 The baseline conditions of the above archaeological marine receptors are summarised in Section 6.7 of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**. Assets such as potential in situ prehistoric sites, if any site or material was discovered, will likely be of very high archaeological importance. Seabed features such as known shipwreck sites are also expected to be of high archaeological value, in accordance with the precautionary approach.

8.4.27 Potential impacts associated with the construction phase have been identified and assessed:

- Direct damage and/or loss to known and potential heritage receptors on and below the seabed.
- Changes to hydrodynamic and sedimentary regimes causing adverse or beneficial indirect effects on seabed heritage receptors.
- Temporary or permanent change to the setting of a known heritage receptor.
- Temporary or permanent change to the character of the historic seascape.

8.4.28 Potential impacts associated with the operation and maintenance phase have been identified and assessed:

- Direct damage and/or loss to known and potential heritage receptors on and below the seabed.
- Changes to hydrodynamic and sedimentary regimes causing adverse or beneficial indirect effects on seabed heritage receptors.

- Temporary or permanent change to the setting of a known heritage receptor (following the construction of the Offshore Scheme, the nature of the seabed will have been changed due to the presence of the marine cable and associated infrastructure at the two landfalls).
- Temporary or permanent change to the character of the historic seascape (noting that the surrounding area is already characterised by a broad spectrum of offshore industry and that once constructed, the Proposed Project will not be visible from sea level).

8.4.29 The assessment concludes that, with the implementation of embedded and additional mitigation measures, the residual effects of all potential impacts on marine archaeology during construction, operation and decommissioning will range from negligible adverse to minor beneficial, which are considered to be not significant.

8.4.30 The minor beneficial effect identified during both construction and operation/maintenance relates to changes to hydrodynamic and sedimentary regimes that cause sediment accretion on the seabed. This would potentially provide temporary or permanent protection to marine archaeology and cultural heritage receptors. It is recommended that post-construction monitoring occurs to ensure that the effect of the impact does not become adverse, whereby changes to hydrodynamic and sedimentary regimes long-term lead to a reduction of seabed sediment, potentially exposing marine archaeological receptors leading to increased rates of deterioration.

8.4.31 Activities to undertake decommissioning of the cable will be dependent on the depth of the cable and mobility of the seabed, which may significantly change. If the cable is left buried in situ, likely significant effects from decommissioning will be avoided. If redundant cables are to be removed during decommissioning, the impacts are likely to result in effects of a similar or lesser significance that those of construction phase (and therefore would not be significant).

## Appraisal of Offshore Scheme

8.4.32 As set out in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology,** there are no designated sites or known sites of prehistoric date, no maritime or aviation sites subject to statutory protection and no coastal or intertidal sites subject to statutory protection within the Offshore Scheme.

8.4.33 In line with paragraphs 5.9.9-5.9.11 of NPS EN-1 (DESNZ, 2024), all known and unknown marine archaeological receptors that may be affected by the Offshore Scheme and their archaeological significance have been described in detail in **Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report** and summarised in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.** The latter also presents the assessment of any likely significant impacts and explains how the mitigation hierarchy has been applied. Both direct and indirect impacts have been considered, as referred to in paragraph 2.8.167 of NPS EN-3 (DESNZ, 2024).

8.4.34 **Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B of REAC** outline mitigation measures and strategies to be put in place that follow the mitigation hierarchy in order to, in first instance avoid or minimise archaeological impacts and effects through the process of design development. Where avoidance is not possible, embedded mitigation is proposed in order to reduce impacts.

8.4.35 As part of the mitigation measures, a Written Scheme of Investigation (WSI) including a Protocol for Archaeological Discoveries will be agreed with the Archaeological Curator via the Regulator and implemented prior to works commencing (**Application Document 7.5.5 Outline Offshore Written Scheme of Investigation (WSI)** is submitted with the application). The Protocol of Archaeological Discoveries will be established to support the reporting of unexpected archaeological material during the lifetime of the Proposed Project.

8.4.36 Locations of known marine archaeological interest/value within the marine environment will be avoided by all marine vessels by the implementation of appropriately-sized Archaeological Exclusions Zones (AEZs), as recommended in paragraphs 2.852-2.8.253 of NPS EN-3 (DESNZ, 2024). No works that could impact the seabed will be undertaken within the extent of an AEZ during the construction, operation and maintenance or decommissioning phases of the Offshore Scheme. Archaeological features of lower archaeological value (geophysical anomalies of archaeological potential) will be avoided where practicable within the marine and coastal/intertidal areas through micrositing of the cable route and siting of infrastructure and temporary works. This helps to ensure the protection of important heritage assets in situ, which paragraph 2.8.252 of NPS EN-3 (DESNZ, 2024) highlights as the most effective form of protection. It also shows that micrositing will be used to avoid the risk of damage to archaeology, in accordance with paragraph 2.8.255 of NPS EN-3 (DESNZ, 2024), which states that the ability to microsite will be an important consideration for the SoS.

8.4.37 The Proposed Project has therefore complied with relevant planning policy by minimising harm to heritage assets through sensitive design and protecting as much of their significance as practicable during the life of the Proposed Project

8.4.38 Given the above, consideration of the prescribed matters set out in Regulation 3 of the Decision Regulations (HM Government, 2010) (discussed earlier in section 2 of this Planning Statement) does not materially alter the planning balance for the Proposed Project.

8.4.39 Overall, the Proposed Project accords with relevant policies relating to the historic environment in the NPS EN-1 (DESNZ, 2024), NPS EN-5 (DESNZ, 2024), the MPS (H.M Government, 2011), the East Inshore and East Offshore Marine Plan (DEFRA, 2014), South East Inshore Marine Plan (DEFRA, 2021) and local planning policy. The presumption in favour of consent of CNP Infrastructure is unaffected by the limited potential effects of the Proposed Project on marine archaeology.

## 8.5 Shipping and Navigation

### Planning Policy Context

#### National Planning Policy

8.5.1 Paragraph 2.8.178 of NPS EN-3 (DESNZ, 2024) establishes an expectation that risks to navigational safety to be reduced to as low as reasonably practicable (ALARP) to ensure safety of shipping.

8.5.2 Paragraph 2.8.184 states that "*Applicants should engage with interested parties in the navigation sector early in the pre-application phase of the proposed offshore wind farm or offshore transmission to help identify mitigation measures to reduce navigational risk".* Furthermore, paragraph 2.8.185 explains that "*Engagement should seek solutions*

*that allow offshore wind farms, offshore transmission, and navigation and shipping users of the sea to co-exist successfully*".

8.5.3 Paragraph 2.8.189 of NPS EN-3 states that "*Applicants must undertake a Navigational Risk Assessment in accordance with relevant government guidance*".

8.5.4 Paragraph 2.8.331 of NPS EN-3 states that "*The Secretary of State should be satisfied that risk to navigational safety is as low as reasonably practicable (ALARP). It is government policy that wind farms and all types of offshore transmission [this includes bootstraps] should not be consented where they would pose unacceptable risks to navigational safety after mitigation measures have been adopted*". Paragraph 2.8.333 goes onto states *"in view of the level of need for energy infrastructure, where an adverse effect on the users of recreational craft has been identified, and where no reasonable mitigation is feasible, the Secretary of State should weigh the harm caused with the benefits of the Proposed Project."*

8.5.5 There is no policy or guidance in the NPPF or PPG relevant to this topic.

### Marine Policy Statement and Marine Plans

8.5.6 Section 3.4 of the MPS (H.M Government, 2011) relates to ports and shipping. Paragraph 3.4.7 states that "*Marine plan authorities and decision makers should take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety and ensure that their decisions are in compliance with international maritime law. Marine Plan development and individual decisions should also take account of environmental, social and economic effects and be in compliance with international maritime law*".

8.5.7 Section 3.12 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) addresses issues related to ports and shipping in the East marine plan areas, where there are *"increasing levels of activity encroaching on navigable space (for example, offshore wind farms), making it ever more important to indicate the area essential for navigation so that it is considered from the outset by public authorities and applicants"* (paragraph 344). Policy SP1 makes it clear that proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization (IMO) designated routes.

8.5.8 In addition, Policy PS3 states:

*"Proposals should demonstrate, in order of preference:*

*a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours*

*b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this*

*c) how, if the interference cannot be minimised, it will be mitigated*

*d) the case for proceeding if it is not possible to minimise or mitigate the interference*

8.5.9 Policy SE-PS-1 of the South East Inshore Marine Plan sets out similar considerations as Policy PS3 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014), in relation to "*proposals that may have a significant adverse impact upon future opportunity for sustainable expansion of port and harbour activities"*. Policies SE-PS-2 and SE-PS-3 relate to proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance.

8.5.10 The Offshore Scheme does not require any permanent static sea surface infrastructure. However, under-keel clearance is discussed as a potential hazard discussed in the environmental assessment of the likely shipping and navigation effects (see below).

## Assessment conclusions

8.5.11 **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation** presents information about the environmental assessment of the likely shipping and navigation effects that could result from the Proposed Project. This chapter is supported by the **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment**.

8.5.12 The key navigational features that may be affected by the Proposed Project are described in **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment** and summarised in Section 7.7 of **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** They include four ports and harbour authority areas: Harwich Haven Authority, the Port of London Authority, Ramsgate Port and Sandwich Port and Haven. Other navigational features considered in the assessment include: International Maritime Organization (IMO) routeing, anchorage areas, pilot boarding stations and grounds and navigational aids (buoys, beacons and navigation lines), recreational traffic and military practice areas.

8.5.13 During the construction and decommissioning phases of the Proposed Project, there is the potential for the following impacts:

- Vessel collisions can occur between passing vessels and the installation operation vessels or between two or more third party vessels due to for example the restriction in sea room caused by the operation.
- Some disruption to routine vessel routeing and any other scheduled activity is expected during the construction phases.
- A risk that a third-party vessel will drop anchor or lose its holding ground in adverse weather and subsequently drag its anchor over a section of exposed cable prior to any required protection being installed.
- Fishing vessels whose gear becomes snagged on the cable prior to burial or protection may sustain extensive damage or suffer foundering during the construction phases of the Offshore Scheme.

8.5.14 The impacts described above for the construction phase would also apply during the operation and maintenance phase, in addition to the following impacts:

- Reduction in under-keel clearance along the Offshore Scheme (caused by cable burial protections, displacement of rocks and the creation of berms and other seabed disturbances during installation) can increase the risk of grounding with a rock berm or other protection feature.
- Electro-magnetic field (EMF) interference with marine navigational equipment (zone of potential magnetic compass deviation from EMF effects) may present some disruption to navigation across the cable lifetime.

## Appraisal of Offshore Scheme

8.5.15 In accordance with Paragraph 2.8.184 of EN-3 (DESNZ, 2024) consultation was undertaken with relevant interested parties. Further details are set out in Section 7.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation**

8.5.16 In accordance with Paragraph 2.8.189, a Navigational Risk Assessment has been undertaken and can be found at **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment.**

8.5.17 Embedded measures have been integral in reducing the adverse effects of the Proposed Project on shipping and navigation. These include Commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP.**

8.5.18 In accordance with paragraph 2.8.178 and 2.8.331 of NPS EN-3, following the implementation of the above embedded mitigation measures, risks to navigational safety will be reduced to Broadly Acceptable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily.

8.5.19 Relevant ports and harbours have been in considered in the assessment and risks associated with operations affecting ports and harbours have been considered at stakeholder consultation sessions (see section 7.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation)** and within the risk assessment and captured in the Hazard Log presented in Annex 4.7.A.1 of the Navigational Risk Assessment (**Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment**).

8.5.20 The risk associated with reduction in under-keel clearance during the operational phase of the Proposed Project is discussed in section 7.9 of **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation** and is assessed as unlikely to be significant (ALARP).

The Proposed Project is therefore in accordance with NPS EN-3, policies PS1 and PS3 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) and policies SE-PS-1, SE-PS-2 and SE-PS-3 of the South East Inshore Marine Plan (DEFRA, 2021).

# 8.6 Commercial Fisheries

## Planning Policy Context

### National Planning Policy

8.6.1 No relevant policy requirements for commercial fisheries have been identified in NPS EN-1.

8.6.2 Paragraph 2.8.153 of NPS EN-3 (DESNZ, 2024) advises applicants to consider both "*direct impacts on fishing activity and indirect impacts such as displacement (on both the industry and Marine Protected Sites) and the ability of fishers to relocate"*.

8.6.3 Paragraph 2.8.154 suggests early consultation with the fishing industry, MMO, SNCBs, IFCAs, Defra, and the Welsh Government to identify impacts, with active fishers encouraged to provide evidence for impact assessments. Paragraph 2.8.155 adds that for proposals involving grid connections to shore or inshore areas, relevant inshore fisheries groups must be consulted.

8.6.4 Paragraph 2.8.157 mandates that applicant assessments must include baseline data and surveys on the effects of the project on commercially important fish stocks, and consider the potential benefits or constraints on fishing activities within the project area.

8.6.5 Applicants are also advised *"to undertake dialogue with the fishing industry during the planning and design of individual offshore wind farm and transmission proposals to maximise the potential for co-existence/co-location and reduce potential for displacement"* (paragraph 2.8.158).

8.6.6 As set out in paragraphs 2.8.250 and 2.8.251 of NPS EN-3, mitigation proposals should result from detailed consultation with relevant stakeholders and be designed *"to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment"*.

8.6.7 Considerations for the SoS decision-making process in relation to commercial fisheries and fishing are outlined in paragraphs 2.8.318 to 2.8.324.

8.6.8 There is no policy or guidance in the NPPF or PPG relevant to this topic.

### Marine Policy Statement and Marine Plans

8.6.9 Section 3.8 of the MPS (H.M Government, 2011) sets out issues for consideration with regard to fisheries and advises marine plan authorities to *"consider the potential social and economic impacts of other developments on fishing activity, as well as potential environmental impacts"*, e.g. the impacts of displacement (paragraph 3.8.10).

8.6.10 Section 3.16 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) relates to Fisheries. Policy FISH1 states:

*Within areas of fishing activity, proposals should demonstrate in order of preference:*

*a) that they will not prevent fishing activities on, or access to, fishing grounds*

*b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them*

*c) how, if the adverse impacts cannot be minimised, they will be mitigated*

*d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts".*

8.6.11 Policy SE-FISH-2 of the South East Inshore Marine Plan (DEFRA, 2021) states:

"*Proposals that may have significant adverse impacts on access for fishing activities must demonstrate that they will, in order of preference:*

*a) avoid*

*b) minimise*

*c) mitigate - adverse impacts so they are no longer significant.*

8.6.12 In addition, policy SE-CO-1 of the South East Inshore Marine Plan and policy GOV2 of the East Inshore and East Offshore Marine Plans seek to promote co-existence.

8.6.13 No relevant policy requirements for commercial fisheries have been identified in the local planning policy.

## Assessment conclusions

8.6.14 **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries** presents information about the environmental assessment of the likely significant commercial fisheries effects that could result from the Proposed Project.

8.6.15 Following analysis of the baseline data, potential impacts to commercial fisheries for the following receptor groups, which have been identified as important for the areas affected by the Proposed Project, are considered:

- Mobile gear fisheries – comprising dredgers, beam trawlers and demersal trawls and seines
- Static gear fisheries – comprising pots and traps and fixed and drift nets.

8.6.16 Potential impacts considered during the construction phase include:

- Temporary loss and alteration of fishing grounds
- Temporary displacement of commercial fishing activities
- Loss or damage to fishing gear
- Indirect effects on commercial fisheries as a result of impacts on the ecology of commercial species
- Obstruction of navigation routes to commercial fishing grounds.

8.6.17 During the operational phase, the Proposed Project has the potential to cause the following impacts:

- Loss and alteration of fishing grounds throughout the lifetime of the cable, predominantly due to the presence of cable protection where the minimum Depth of Lowering (DOL) cannot be achieved, such as locations of cable crossings;
- Displacement of commercial fishing activities, caused by any loss or restricted access to commercial fishing grounds;
- Loss or damage to fishing gear (snagging), due to the presence of cable protection and vulnerable sections of cable (should sections become exposed over time);
- Indirect effects on commercial fisheries as a result of impacts on the ecology of commercial species, due to subsea cable thermal emissions and electromagnetic field (EMF) emissions.

8.6.18 During the maintenance phase, it is expected that maintenance activity along the marine cable route would be limited to non-intrusive inspections and cable repairs. As such, the same impact pathways appraised as part of the construction phase are relevant to the maintenance phase.

8.6.19 The impacts identified for the construction phase are also considered to apply to decommissioning activities.

8.6.20 Taking into account of the mitigation measures outlined in Sections 8.8 and 8.10 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries**, the residual effects resulting from the above impacts, during the construction, operational, maintenance and decommissioning phases of the Proposed Project, have been assessed to have minor significance. The residual effects and conclusions are summarised in Section 8.12 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries.**

## Appraisal of Offshore Scheme

8.6.21 **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries** confirms that the Proposed Project will not have any likely significant adverse effect on commercial fisheries.

8.6.22 The assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries** has considered both direct impacts on fishing activities and indirect impacts such as displacement, as specifically required by paragraph 2.8.153 of NPS EN-3 (DESNZ, 2024). Potential benefits or constraints on fishing activities within the project area were also considered, in line with paragraph 2.8.157 of NPS EN-3.

8.6.23 In accordance with Paragraph 2.8.154 and Paragraph 2.8.155 of NPS EN-3, consultation was undertaken with relevant fisheries stakeholders. This consultation is on-going and will continue after submission of the ES. Further details on consultation are set out in Section 8.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries.**

8.6.24 Embedded measures have been integral to reducing the effects of the Proposed Project on commercial fisheries. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP.** They are summarised in Sections 8.8 and 8.10 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries.** One of these measures included in **Application Document 7.5.3.2 Appendix B REAC** is to maintain a Fisheries Liaison Officer (FLO) and fisheries working group(s) throughout the construction phase 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.

8.6.25 There is a potential for effects of moderate significance to occur on static gear fisheries, related to the temporary loss or alteration of fishing grounds during the construction phase. This level of significance is reliant on the proposed development of a procedure for the claim of loss of/or damage to fishing gear as outlined in **Application Document 7.5.3.2 Appendix B REAC.** The detailed nature of the compensation will be agreed post consent as part of an evidence-based cooperation agreement between fisheries and the developer. However, with an additional commitment to the extent and nature of the compensation measures to be developed, this could potentially be reduced to a minor significance.

8.6.26 In addition, there is potential for effects of moderate significance to occur on static gear fisheries, related to the loss and alteration of fishing grounds during the operational phase. This predominantly relates to the risk of bottom drift nets snagging on the current cable protection design, due to the use of rock berms. Consultation with fishers on the design of cable protection and post installation surveys are considered to reduce this impact pathway to one of minor significance.

8.6.27 Further details on these additional mitigation and enhancement measures are provided in Section 8.10 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries**.

8.6.28 On the basis of the above, it is considered that National Grid has undertaken dialogue with the fishing industry to maximise the potential for co-existence and has involved the relevant stakeholders in the development of mitigation measures where appropriate. This is in line with the requirements set out in NPS EN-3 (paragraphs2.8.158, 2.8.250, 2.8.251) (DESNZ, 2024).

8.6.29 It is also considered that the Proposed Project is in accordance with Policy FISH1 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) and policy SE-FISH-2 of the South East Inshore Marine Plan (DEFRA, 2021), effects on commercial fisheries are first avoided where possible. Where this is not possible, the effects will be minimised through duration of installation activities and planned liaison with fishers. There is currently potential for effects of moderate significance to occur on static gear fisheries, related to temporary loss or alteration of fishing grounds. However, with mitigation, the residual impacts could potentially be reduced to a minor significance which would not be significant.t

## 8.7 Other Sea Users

### Planning Policy Context

#### National Planning Policy

8.7.1

8.7.2 Paragraph 5.4.35 of EN-1 (DESNZ, 2024) states Applicants must include appropriate avoidance, mitigation, compensation, and enhancement measures as part of their development plans.

8.7.3 Paragraph 2.5.2 of EN-3 (DESNZ, 2024) sets outs that proposals for renewable energy infrastructure should demonstrate good design, particularly regarding landscape, visual impact, opportunities for co-location with other uses, and measures to mitigate noise, ecological, and heritage impacts.

8.7.4 Paragraph 2.8.184 of EN-3as Applicants should engage with stakeholders in potentially affected offshore sectors early in the pre-application phase.

8.7.5 Paragraph 2.13.21 of EN-5 (DESNZ, 2024)states the sensitivities of coastal and marine environments, along with potential environmental, community, and onshore impacts, must be considered when identifying onshore connection points.

8.7.6 Paragraph 2.5.2 of EN-3 (DESNZ, 2024) sets outs that proposals for renewable energy infrastructure should demonstrate good design, particularly regarding landscape, visual impact, opportunities for co-location with other uses, and measures to mitigate noise, ecological, and heritage impacts.

8.7.7 There is no policy or guidance in the NPPF or PPG relevant to this topic.

#### Marine Policy Statement and Marine Plans

8.7.8 Paragraph 3.3.29 of the MPS (H.M Government, 2011) recognises that there are social and economic risks associated with such an increase in underwater cabling, which may affect activities such as dredging and the use of certain fishing gear, and impact on other sea users, including existing cable and pipeline operators.

8.7.9 Policy GOV 1 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) states that appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. Policy GOV2 adds opportunities for co-existence should be maximised wherever possible.

8.7.10 Policy SE-CO-1 of the South East Inshore Marine Plan Policy (DEFRA, 2021) stipulates that proposals that optimise the use of space and incorporate opportunities for co-existence and cooperation with existing activities will be supported.

## Assessment conclusions

8.7.11 Likely significant effects on infrastructure and other marine users have been considered in **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Other Sea Users** and covers:

- Marine tourism and recreation: recreational boating, recreational fishing and other recreational activities
- Offshore infrastructure: offshore wind and tidal projects, mineral and aggregate extraction, dredging and disposal sites, military practice and exercise areas, pipeline and subsea cables and aquaculture.

8.7.12 Impacts and mitigation to maximise co-existence with commercial fisheries, shipping and recreational users are discussed in **Application document 6.3.4.8 Part 4 Marine Chapter 8 Shipping and Navigation** and **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Commercial Fisheries.**

8.7.13 Potential impacts associated with construction have been assessed:

- Installation of infrastructure, which could interfere with and/or displace other sea users from tourism and recreation and offshore infrastructure.
- Physical presence of vessels, which could interfere with and provide obstacles in an area already characterised by high density vessel traffic.
- Visual intrusion and noise, which would deter recreational boating and fishing during construction.
- Pre-clearance and pre-sweeping of seabed, requiring the presence of specialist equipment which may interfere with the operation of other sea users.

8.7.14 Potential impacts associated with operation and maintenance have been assessed:

- Physical presence of vessels (noting that the number of vessels associated with the operation and maintenance of the cable is expected to be considerably lower than that for construction).
- Visual intrusion and noise (any visual intrusion and noise during operation and maintenance would be temporary and short term).

8.7.15 Potential impacts associated with the decommissioning phase are similar to those associated with construction.

8.7.16 The Offshore Scheme intersects or passes within close proximity to a number of existing, pre-planning application stage, consented or under construction offshore windfarm export cables. However, the Proposed Project will only restrict development in a relatively narrow corridor of seabed. Once installed, a working zone may be required either side of the submarine cables to enable access for cable maintenance and repair operations. According to subsea cable guidance, the working zone is 500m either side of the existing subsea cable. The Proposed Project is not expected to restrict the development of offshore wind farms, in accordance with East Inshore and East Offshore Marine Plans Policy WIND2.

8.7.17 There are a number of mineral and aggregate extraction areas located within the study area (10 km of Order Limits). Although these areas do not overlap with the Offshore Scheme, three are located within 1 km. Minor vessel routing changes may be required due to increased vessel movements and the presence of any safety zones. Any

disturbance from the physical presence of vessels will be temporary, with any restrictions to commercial operations short term and representing only a very slight change from baseline conditions. No future site agreements have been identified along the cable route during this assessment. Therefore, the Proposed Project will not prevent current or future extraction in line with Marine policy on the matter.

8.7.18 The assessment concludes that the Offshore Scheme would not result in any significant impacts for other sea users, and therefore no significant residual impacts have been identified as a result of the Offshore Scheme.

## Appraisal of Offshore Scheme

8.7.19 The assessment in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** found that no significant effects are expected to impact other sea users as a result of the Proposed Project's embedded mitigation and control and management measures.

8.7.20 Additionally, the Proposed Project has been designed in such a way that allows for future co-location (see **Application Document 6.2.1.3 Part 2 Suffolk Chapter 3 Main Alternatives Considered**), in accordance with NPS EN-3 paragraph 2.5.2 and Policy GOV2 of the East Inshore and East Offshore Marine Plans Policy. Impacts and mitigation to maximise co-existence with commercial fisheries, shipping and recreational users are discussed in **Application document 6.3.4.8 Part 4 Marine Chapter 8 Shipping and Navigation** and **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Commercial Fisheries** in accordance with paragraph 5.4.35 of NPS EN-1**.**

8.7.21 Given all of the above, the Proposed Project is considered to be in accordance NPS EN-1 paragraph 5.4.35 (DESNZ, 2024), NPS EN-3 paragraphs 2.5.2 and 2.8.184 (DESNZ, 2024), NPS EN-5 paragraph 2.13.21 (DESNZ, 2024), the MPS (H.M Treasury, 2020), East Inshore and East Offshore Marine Plans (DEFRA, 2014) and South East Inshore Marine Plan (DEFRA, 2021).

# 8.8 Cumulative Effects

## Planning Policy Context

### National Planning Policy

8.8.1 NPS EN-1 (DESNZ, 2024), paragraph 4.1.5 states that "*In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:*

- its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits
- its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy."

8.8.2 Paragraph 4.2.12 of NPS-EN-1 relates to the Applicant's consideration of residual impacts stating that "*the cumulative impacts of multiple developments with residual impacts should also be considered."*

8.8.3 Paragraph 4.3.3 of NPS EN-1 requires applicants to provide an assessment of the likely significant effects of a proposed development, in accordance with the requirements of the EIA Regulations, including any cumulative effects.

8.8.4 Paragraph 4.3.19 of NPS EN-1 with respect to decision making states that:

*"The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place".*

8.8.5 Paragraph 2.8.72 of NPS EN-3 (DESNZ, 2024) sets out that the "*Assessment of environmental effects of transmission infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure.*"

8.8.6 NPS EN-5 (DESNZ, 2024) reiterates the policy positions of NPS EN-1 confirming the need to consider cumulative impacts within the ES and this being an overall consideration as part of the planning balance exercise.

8.8.7 There is no policy or guidance in the NPPF or PPG relevant to this topic.

### Marine Policy Statement and Marine Plans

8.8.8 Policy ECO1 of the East Inshore and East Offshore Marine Plans (DEFRA, 2014) states *"Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation."*

8.8.9 Policy SE-CE-1 of the South East Inshore Marine Plan (DEFRA, 2021) states *"Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will, in order of preference:*
*a) avoid*
*b) minimise*
*c) mitigate - adverse cumulative and/or in-combination effects so they are no longer significant."*

## Assessment conclusions

8.8.10 **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects** and **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter- Project Cumulative Effects** respectively assess the intra-and inter-, cumulative effects, of the Offshore Scheme. Intra-cumulative effects refer to where a single receptor is affected by more than one source of effect arising from different aspects of the Proposed Project, whereas inter-cumulative effects arise from where there is the potential for two or more developments that are reasonably foreseeable and/ or consented but not yet forming part of the baseline environment and within close enough proximity to the Proposed Project to lead to significant cumulative effects on the same receptor.

8.8.11 **Application Document 6.2.4.10 Part 4 Marine Intra-Project Cumulative Effects** identifies that no receptors will experience more than one effect. Therefore, all marine receptors have been wholly assessed within topic chapters and no intra-cumulative effects are anticipated for marine receptors during the Proposed Project.

8.8.12 **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** identifies a 'Short list' of major developments within the Proposed Projects Zone of Influence (ZOI) to be considered in the Inter-Project Cumulative Effects Assessment (CEA), as presented in Table 11.2. The CEA assesses the inter-cumulative effects for each major development within the ZOI against each offshore topic area covered within the ES.

8.8.13 The assessment of inter-project cumulative effects for the Proposed Project and the surrounding short-listed development, identified the potential for cumulative effects on the different marine receptors assessed within the ES.

8.8.14 With appropriate mitigation measures in place, it is considered that there are no significant cumulative effects on marine archaeology as a result of the Offshore Scheme and the shortlisted developments. However, due to the increasing number of Offshore developments within proximity of the Proposed Project, there is potential for future significant archaeological discoveries, requiring increased project-specific mitigation that developers will be required to finance. Therefore, it is possible that a regional thematic approach to dealing with these types of seabed resources could be initiated.

8.8.15 The potential interactions between the Proposed Project and the short-listed projects affecting shipping and navigation is considered minimal. However, additional mitigation is required at Pegwell Bay as there is potential for significant cumulative effects. Pegwell Bay is a region where the waters are shallow and changeable, and where two other project cables also route and make landfall (NEMO Link and Thanet Offshore Windfarm export cable). As such, communication plans and protocols as identified in **Application Document 7.5.2 Outline Offshore CEMP** and **Application Document 7.5.3.2 CEMP Appendix B REAC**, will be implemented so as to minimise and reduce the cumulative impact on shipping and navigation, resulting in no likely significant effects.

8.8.16 The potential interactions between the Proposed Project and the other short-listed projects on commercial fisheries are considered minimal. However, there is potential for static gear fisheries to experience significant cumulative effects during the construction and operation phases of the Proposed Project. The effects are likely to be caused by, the location and timing of exclusion zones around instillation, the cumulative number of locations where cable protection is required and the details of the compensation measures for fishers that each project commits to. Therefore, to mitigate against this occurrence, a Fishers Liaison Officer and fishers working group(s) will be maintained throughout instillation to ensure project information is effectively communicated. Additionally, mitigation measures will be implemented as set out in section 11.4 (commercial fisheries) **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-project Cumulative Effects**. As such no likely significant commercial fishing effects are anticipated as a result of interaction of the Proposed Project and the short-listed developments.

8.8.17 Due to other projects overlapping and being within close proximity with the Offshore Scheme, there is potential for direct and indirect cumulative impacts on the physical environment, marine ecology and biodiversity and other sea user receptors. However, with appropriate mitigation measures and due to most of the effects being highly localised and temporary, there are considered to be no likely significant cumulative effects.

## Appraisal of Offshore Scheme

8.8.18 In accordance with national policy, an assessment of the cumulative effects of the Offshore Scheme has been undertaken to assess whether there are any significant effects of the Proposed Project, that in isolation are made greater when considering the Proposed Project alongside other developments.

8.8.19 **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects** assesses intra cumulative effects of the Offshore Scheme, so as to analyse if there are multiple effects on individual marine receptors.

8.8.20 **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** provides a four-stage assessment of how the surrounding development effects the different marine receptors assessed within the ES. The CEA concludes with a further preliminary assessment which considers the overall cumulative effect of the Proposed Project and all other developments together, on shared marine receptors. This overall assessment, per receptor topic, is provided in tables 11.23-11.31.

8.8.21 Tables 11.23-11.31 of **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects** set out the likely cumulative effects of the Proposed Project and in the case where adverse effects are expected, mitigation measures are also set out to avoid, minimise and/or reduce the adverse effects, in accordance with policy SE-CE-1 of the South East Inshore Marine Plan (DEFRA, 2021).

8.8.22 Mitigation measures are embedded into the design of the Proposed Project and are introduced as additional mitigation measures, such as, communication plans and protocols as identified in **Application Document 7.5.2 Outline Offshore CEMP** and **Application Document 7.5.3.2 CEMP Appendix B REAC** to mitigate cumulative impacts on shipping and navigation. Furthermore, setting up Fishers Liaison Officer, and effective communication lines to reduce the cumulative effects on commercial fisheries.

8.8.23 Overall, it is determined that the Offshore Scheme is in accordance with both paragraphs 4.1.5, 4.2.12, 4.3.3. and 4.3.19 of NPS EN-1 (DESNZ, 2024), paragraph 2.8.72 of NPS EN-3 (DESNZ, 2024) and NPS EN-5 (DESNZ, 2024) as well as local policy relating to the cumulative effects of the Proposed Project on marine receptors as there are considered to be no significant cumulative effects.

# 9. Decision-making and Planning Balance

## 9.1 Introduction

9.1.1 Section 104(3) of the PA 2008 provides that the Application *"must be decided in accordance with any relevant national policy statement, except to the extent that one or more subsections (4) to (8) applies".*

9.1.2 Section 104(2) states that *"in deciding an application for development consent the Secretary of State must have regard to:*

*a. Any relevant national policy statement;*

*aa. The appropriate marine policy documents;*

*b. Local impact reports;*

*c. Prescribed matters; and*

*d. Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision."*

9.1.3 The following sections present a summary of the evidence to allow the SoS to grant development consent for the Proposed Project in accordance with Section 104 of the PA 2008.

## 9.2 Section 104(3) of the PA 2008

### Compliance of the Proposed Project with the relevant NPSs

9.2.1 The relevant NPSs in respect of the Proposed Project are NPS EN-1 (DESNZ, 2024), NPS EN-3 (DESNZ, 2024) and NPS EN-5 (DESNZ, 2024). The SoS must therefore decide the Application in accordance with these NPSs. Sections 6,7 and 8 as well as Appendix A of this Planning Statement detail the Proposed Project's compliance with these NPSs. Sections 6, 7 and 8 as well as Appendix A of this Planning Statement demonstrate that the Proposed Project is in accordance with these NPS.

9.2.2 Section 3 of NPS EN-1 sets out the urgent need for significant amounts of new large-scale low carbon energy infrastructure to meet the government's energy objectives, with paragraph 3.2.6 of the NPS EN-1 stating that:

"*The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this* Part."

9.2.3 For those projects which have a Section 35 direction, such as the Proposed Project, paragraph 3.2.12 of NPS EN-1 states that, in these circumstances any application would need to be considered in accordance with the NPS, in particular *"where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State*

*should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.83 of this NPS"*

9.2.4 Paragraphs 3.3.65 to 3.3.66 of NPS EN-1 state:

*"There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.*

*The security and reliability of the UK's current and future energy supply is very highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts."*

9.2.5 Paragraph 3.3.62 of NPS EN-1 explains that the *"Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure".*

9.2.6 Paragraph 4.2.4 of NPS EN-1 explains that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure and defines the project types for low carbon infrastructure at paragraph 4.2.5 and in section 6 Glossary.

9.2.7 NPS EN-1 paragraph 4.2.5 identifies bootstraps as nationally significant low carbon infrastructure. The Proposed Project is a bootstrap and therefore nationally significant low carbon infrastructure which is of CNP. In accordance with paragraphs 3.3.65 and 3.3.66 of NPS EN-1, the Proposed Project will provide the urgently needed reinforcement to 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.

9.2.8 NPS EN-1 Paragraph 4.2.15 states that "*Where residual non-HRA or non MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure."*, or in other words, "*it is unlikely that consent will be refused on the basis of these residual impacts"* (Figure 2: Application of CNP in decisions relating to Environmental Impacts Assessments of NPS EN-1). As further set out in paragraph 4.2.15, the exceptions to this presumption of consent relate to circumstances in which residual effects onshore and offshore would present "*an unacceptable risk"* to:

- Human health and public safety:
  - The ES concludes the Proposed Project will not result in significant adverse effects on human health and wellbeing (see Section 7.15 of this Planning Statement for further details).
  - Matters of public safety and pollution control are also considered where appropriate throughout the ES, including **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment, Application 6.3.2.5.B Qualitative Groundwater Risk Assessment, Application Document**

**6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment, Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment, Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note**, **Application Document 6.3.3.7.A Appendix 3.7.A Transport Assessment Note** and **Application Document 6.8 Flood Risk Assessment.**

- As set out in **Application Document 6.15 Scoping Opinion 2022,** it was agreed that the potential major accidents and disasters from the Proposed Project can be mitigated or reduced by the processes and standards in place and that the Proposed Project is also unlikely to generate any significant effects on the environment if a major accident or disaster were to occur. This was therefore scoped out of the EIA. As part of the statutory consultation carried out in October 2023, the Health and Safety Executive (HSE) were notified and invited to comment on the Proposed Project and no response was received.
- Management plans are submitted with the Application which secure the implementation of measures during construction and operation which would seek to avoid or reduce risks relating to pollution and emissions, including **Application Document 7.5.3 Outline Onshore CEMP, Application Document 7.5.3.1 CEMP Appendix A Outline CoCP, Application Document 7.5.3 Outline Onshore CEMP, Application Document 7.5.6.21 Outline Air Quality Management Plan – Suffolk, Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent, Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Plan – Kent.**
- **Application Document 6.7 Statement of Statutory Nuisance** describes the matters that constitute 'statutory nuisances' within Section 79(1) of the Environmental Protection Act 1990 (EPA 1990) and considers whether the Proposed Project has the potential to cause nuisance, concluding that, with good practice measures in place (included in the abovementioned management plans), no breach of Section 79(1) of the EPA 1990 is expected as a result of the Proposed Project.
- In light of all of the above, the Proposed Project would not present an unacceptable risk to human health and public safety.

- Defence: defence interests such as Practice and Exercise Areas (PEXAs) have been identified where relevant. One Navy PEXA (Kentish Knock) intersects the Offshore Scheme and the assessment (in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users**) has concluded that the impact of vessel presence on military PEXA would result in a minor /negligible effect, which is not significant (see Section 8.7 of this Planning Statement). The Proposed Project would not therefore present an unacceptable risk to defence interests.
- Irreplaceable habitats: there is no loss of, or significant adverse effects on, ancient woodland, ancient and veteran trees and other irreplaceable habitats from the Proposed Project (see Section 7.4 of this Planning Statement for further details), and therefore there is no unacceptable risk to irreplaceable habitats.
- The achievement of Net Zero: the Proposed Project contributes to Net Zero by providing significant reinforcements to the transmission system which will facilitate

the connection of future sources of renewable and low carbon power generation along the coast, and therefore will facilitate achievement of Net Zero.

- Offshore navigation: the Proposed Project will not result in unacceptable risks to navigational safety and therefore does not present an unacceptable risk to offshore navigation.
- Flood and coastal erosion risk:
  - **Application Document 6.8 Flood Risk Assessment** concludes that residual risk of flooding during construction and operation would be low and flood risk to neighbouring land would not be increased.
  - The impact of coastal geomorphological change and associated changes to sediment transport regimes is assessed in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** as not significant at both the Suffolk and Kent landfalls during construction and operation (see section 8.2 of this Planning Statement).
  - The Proposed Project would not therefore present an unacceptable flood and coastal erosion risk.

9.2.9 As set out above, none of the exceptions to the presumption of consent set out in paragraph 4.2.15 apply. The presumption in favour of consent for CNP infrastructure is therefore not affected with regard to these exceptions.

9.2.10 As illustrated in Figure 3: Application of CNP in decisions relating to Habitats Regulations Assessments of NPS EN-1 (DESNZ, 2024), the presumption of consent does not apply either in the case of residual effects relating to a HRA or a MCZ, with paragraph 4.2.19 of NPS EN-1 (DESNZ, 2024) advising that, in that case, the SoS will need to consider making a derogation under the Habitats Regulations. It is established in **Application Document 6.6 HRA Report** and **Application Document 6.11 Marine Conservation Zone Assessment** that the Proposed Project does not result in any HRA or MCZ residual effects. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands.

9.2.11 As a result of the above, as stated in paragraph 4.2.16 of NPS EN-1 (DESNZ, 2024), *"the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances"*.

9.2.12 Paragraph 4.2.17 expands by saying:

"*This means that the SoS will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:*

- *where development within a Green Belt requires very special circumstances to justify development;*
- *where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs.*
- *where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*

- *where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional".*

9.2.13 Taking each of the above tests in turn, the Proposed Project is not located within a Green Belt, and therefore very special circumstances are not required to justify its development.

9.2.14 The Suffolk Onshore Scheme and the Kent Onshore Scheme would traverse sites of national importance for nature conservation (Leiston-Aldeburgh SSSI and Sandwich Bay to Hacklinge Marshes SSSI, respectively) using trenchless methods. Since there would be no habitat loss, this is considered to result in negligible (not significant) effects on the SSSIs. As the Proposed Project is not likely to have an adverse effect on the SSSIs, the test set out in paragraph 5.4.8 of NPS EN-1 (DESNZ, 2024) is not engaged. This test requires development likely to have an adverse impact on a SSSI to demonstrate that its benefits clearly outweigh both its likely impact on the features of the SSSI and any broader impacts on the national network of SSSIs. This is discussed in Section 7.4 of this Planning Statement.

9.2.15 The Suffolk Onshore Scheme is located partly within a nationally designated landscape (the Suffolk and Essex Heaths and Coast AONB). However, the elements of the project located within this area are limited to the Suffolk landfall and the HVDC underground cable, which in line with the presumption in NPS EN-5, is located underground in the designated area. The Converter Station and Substation have been located outside the AONB, and sited to avoid significantly affecting the setting of the AONB. As a result of all these measures, the project would not have a significant adverse effect on the AONB when considered individually. There is the potential for significant cumulative adverse effects during construction (and from viewpoint 6 during operation) due to the activities also occurring to facilitate the already consented Sizewell C, EA1N and EA2 projects. It should be noted that the cumulative benefits of these projects are very significant, particularly for the achievement of Net Zero. Exceptional circumstances are considered to exist to justify the Proposed Project in this nationally designated landscape given the urgent need for the project, the lack of alternatives that avoid the AONB and the limited adverse effects. These are discussed in Section 7.2 of this Planning Statement.

9.2.16 The Proposed Project will not result in substantial harm or loss of significance to any designated heritage assets as set out in the Heritage Statement at Appendix E and summarised in Section 7.5 of this Planning Statement.

9.2.17 Based on the above, compliance with relevant national policy has been demonstrated and the CNP status of the Proposed Project outweighs any residual impacts remaining after the mitigation hierarchy has been applied.

## Section 104(7) of the PA 2008: Planning Balance

9.2.18 In deciding the Application in accordance with Section 104(3) of the PA 2008 the SoS must be satisfied that "*the adverse impacts of the proposed development would outweigh its benefits"* (Section 104(7)). To determine this, a balance of the Proposed Project's adverse impacts against its benefits must be carried out. This overall planning balance is presented below.

9.2.19 Paragraph 4.1.5 of NPS EN-1 (DESNZ, 2024) sets out how the SoS, when making a decision, will weigh "*adverse impacts against its benefits*". The glossary associated with NPS EN-1 (DESNZ, 2024) confirms that in making a decision, the SoS will apply the following hierarchy of weight:

- Limited.
- Moderate.
- Great.
- Significant.
- Substantial.

9.2.20 The following paragraphs have regard to the outcomes of the planning appraisal in Sections 6, 7 and 8 of this Planning Statement with respect to the potential environmental, social and economic impacts of the Proposed Project and apply the planning balancing exercise. **Application Document 6.2.5.3 Part 5 Combined Chapter 3 Summary of Likely Significant Effects** also summarises the position on likely significant residual effects of the Proposed Project.

9.2.21 The benefits of the Proposed Project are discussed in detail in Section 5 of this Planning Statement and are therefore summarised below.

## Positive Impacts

### Net Zero

9.2.22 As set out in Section 5 of this Planning Statement, the Proposed Project will play an important part in allowing the UK to decarbonize its energy system and to deliver a more secure and resilient energy system. This important contribution of the Proposed Project towards meeting the target of net zero emissions by 2050 is considered a **substantial positive weight** in the planning balance.

9.2.23 The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons:

- the existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore);
- the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport;
- as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses; and
- upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.

9.2.24 The transmission system in East Anglia was built primarily to serve consumer demand from homes and businesses in the region. For many years the only significant power stations generating in the East Anglia region were the Sizewell A and the Sizewell B nuclear power stations, Spalding North and Sutton Bridge gas fired power stations, and some further smaller 132 kV connected gas fired power stations.

9.2.25 This generation capacity has recently been increased due to several offshore windfarms, with the existing generation in East Anglia totalling 7,687.4 MW of installed capacity. This is expected to grow substantially in coming years, with connection agreements being signed for 27,329.3 MW of new installed capacity in the East Anglia

region, over three times that capacity installed at present. These connection agreements comprise a large volume of offshore wind generation (including East Anglia Offshore Wind), gas-fired generation, energy storage projects, a nuclear power station (at Sizewell C) and additional interconnector capacity. Without reinforcement, the existing network will not be sufficient to accommodate these new power sources.

9.2.26 The Proposed Project is required particularly to support offshore wind projects, which in turn are required to meet the Government's targets for the connection of up to 50 GW of offshore wind by 2030. This offshore generation is a key part of a strategy for secure, clean and affordable British energy for the long term. The need for the Proposed Project is clear and urgent. See **Application Document 7.2 Strategic Options Back Check Report** for more information on the projects to be served and the needs case.

9.2.27 In November 2024, the National Energy System Operator published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (NESO, 2024). This report states that *"Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030."* The Proposed Project is specified as one of those three projects. The critical and urgent nature of the project is therefore also recognized in the strongest terms in a recent report in achieving Clean Power 2030 objectives.

### Ecology and Nature Conservation

9.2.28 Through the implementation of measures set out in **Application Document 7.5.7.1 oLEMP – Suffolk** and **Application Document 7.5.7.2 oLEMP – Kent**, to be secured through Requirement 6 of **Application Document 3.1 draft DCO**, the Proposed Project will deliver a range of ecological enhancements.

9.2.29 These enhancements are also summarised in Section 5.3 of this Planning Statement and include:

- For the Suffolk Onshore Scheme:
  - Permanent net increase in woodland, wetland and semi-natural grassland creation around the Saxmundham Converter Station and Friston Substation.
  - Acid grassland creation and/or enhancement (c. 6 ha) within the Suffolk and Essex Coast and Heaths AONB as identified in **Figure 4 Saxmundham Converter Station Enhancement Areas** (this area will be secured by **Application Document 7.5.3.2 Appendix B REAC** and by agreement with the landowner or by compulsory acquisition powers included within the DCO).
  - Skylark habitat enhancement (12 ha) to secure suitable nesting habitat for skylark as identified in **Figure 4 Saxmundham Converter Station Enhancement Areas** (this area will be secured by **Application Document 7.5.3.2 Appendix B REAC** and by agreement with the landowner or by compulsory acquisition powers included within the DCO).

- For the Kent Onshore Scheme:

9.2.30 Permanent net increase in woodland, wetland and semi-natural grassland creation around the Minster Converter Station and Substation in Kent and through the creation of swales along the permanent access road.In this regard, biodiversity and ecological enhancements should be afforded **moderate positive weight** in the planning balance.

### Employment Generation

9.2.31 Both the Suffolk and Kent Onshore Schemes are expected to produce socio-economic and employment beneficial effects on employment through direct employment of construction workers and additional net employment in other sectors, during the construction phase accounting for leakage, displacement and multiplier effects. Further to this, the estimated GVA per worker during the construction phase is expected to contribute beneficial effects to both the national and regional economy. Therefore, this should be afforded **limited positive weight** in the planning balance.

## Neutral Impacts

### Water Environment

9.2.32 There will be no significant residual adverse effects on water quality and resources therefore these matters should be afforded **limited weight** in the planning balance.

### Geology and Hydrogeology

9.2.33 There will be no significant residual adverse effects on geology and hydrogeology therefore these matters should be afforded **limited weight** in the planning balance.

### Traffic and Transport

9.2.34 There will be no significant residual adverse effects on traffic and transport therefore these matters should be afforded **limited weight** in the planning balance.

### Air Quality

9.2.35 There will be no significant residual adverse effects on air quality therefore these matters should be afforded **limited weight** in the planning balance.

### Noise and Vibration

9.2.36 There will be no significant residual adverse effects on noise and vibration therefore these matters should be afforded **limited weight** in the planning balance.

### Socio-economics, recreation and tourism

9.2.37 There will be no permanent significant residual adverse effects on socio-economics, recreation and tourism; therefore these matters should be afforded **limited weight** in the planning balance. The socio-economic effect of employment generation is reported separately under the Positive Impacts above.

### Health and Wellbeing

9.2.38 There will be no significant residual adverse effects on human health and wellbeing therefore these matters should be afforded **limited weight** in the planning balance.

### Marine Ecology and Biodiversity

9.2.39 There will be no significant residual adverse effects on benthic ecology, fish and shellfish, marine mammals or ornithology therefore these matters should be afforded **limited weight** in the planning balance.

### Marine Archaeology

9.2.40 There will be no significant residual adverse effects on marine archaeology therefore these matters should be afforded **limited weight** in the planning balance.

### Shipping and Navigation, Commercial Fisheries and Other Sea Users

9.2.41 There will be no significant residual adverse effects on shipping and navigation, commercial fisheries and other sea users; therefore these matters should be afforded **limited weight** in the planning balance.

### Cumulative Effects (Offshore Scheme)

9.2.42 There will be no significant residual adverse effects resulting from the Offshore Scheme intra-project cumulative impacts and Offshore Scheme inter-project cumulative impacts; therefore these matters should be afforded **limited weight** in the planning balance. Effects relating to the Suffolk and Kent Onshore Schemes are considered separately under the Negative Impacts below.

### Climate Change

9.2.43 There will be no significant residual adverse effects on climate change therefore these matters should be afforded **limited weight** in the planning balance.

## Negative Impacts

### Cultural Heritage

9.2.44 The Heritage Statement (**Appendix D of this Planning Statement**) concludes that the Proposed Project would not result in substantial harm to any designated or non-designated assets. However, a number of designated and non-designated heritage assets, from both the Suffolk Onshore Scheme and the Kent Onshore Scheme, have been identified as likely to experience less than substantial harm (see Section 7.5 of this Planning Statement).

9.2.45 The Proposed Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. However, due to the statutory tests outlined in the Infrastructure Planning (Decisions) Regulations 2010 (H. M. Government, 2010), the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being

afforded great weight against the Proposed Project due to this statutory duty. Given that the Heritage Statement demonstrates that the Proposed Project results in less than substantial harm, at the lower end of the spectrum to all assets, this is afforded **moderate negative weight** in the planning balance. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.

### Landscape and Visual

9.2.46 As a result of the Suffolk Onshore Scheme, there will be permanent residual significant adverse effects (at Year 15 of Operation and Maintenance phase) on:

- Landscape character at Suffolk Coastal Landscape Character Assessment (SCLCA) Landscape Character Area (LCA) L1;
- Visual amenity at Viewpoints 1, 2, 3, 4, 5, 15, 19, 20 and 21; and
- Visual amenity Viewpoint 6, 7and 22 (if Friston Substation is built as part of the Proposed Project).

9.2.47 As a result of the Kent Onshore Scheme, there will be permanent residual significant adverse effects (at Year 15 of Operation and Maintenance phase) on:

- Visual amenity at Viewpoints 4, 5, 6 and 11.

9.2.48 Embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Proposed Project. Paragraph 5.10.5 of NPS EN-1 (DESNZ, 2024) acknowledges that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape"* and paragraph 5.10.13, that *"all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites"*. For CNP infrastructure, "*the need case will outweigh the residual effects in all but the most exceptional cases"* (paragraph 4.1.7 of NPS EN-1 (DESNZ, 2024)). As explained in Section 9.3 of this Planning Statement, the presumption in favour of consent is engaged.

9.2.49 Whilst part of the Suffolk Onshore Scheme is located within a National Landscape (Suffolk and Essex Coast and Heaths AONB), it has been demonstrated that exceptional circumstances exist to justify the development in this nationally designated landscape. Notwithstanding, paragraph 4.2.17 of NPS EN-1 (DESNZ, 2024) confirms that, for projects which qualify as CNP infrastructure, the Secretary of State will take as a starting point that this test is met.

9.2.50 During construction, there would be temporary direct effects in localised areas of the AONB associated with the HVDC cable laying which are assessed as not significant. The construction activity affecting the AONB and its setting would be localised and the main activity of laying the HVDC cable is not considered to be dissimilar to typical agricultural machinery on arable fields and the seasonal disturbance of soils which is characteristic of arable land. The only direct and indirect changes arising from the Suffolk Onshore Scheme at Year 15 of operation would be highly localised and represent a very slight alteration to the key characteristics of the AONB and its setting, which is assessed to be not significant.

9.2.51 National Grid has considered the duty to seek to further the purposes of the AONB and proposes c. 6 ha of acid grassland creation and/or enhancement in the AONB, as identified in **Figure 4 Saxmundham Converter Station Enhancement Areas** (to be secured via **Application Document 7.5.3.2 Appendix B REAC** and by agreement with the landowner or compulsory purchase acquisition powers included with the DCO).

9.2.52 Whilst it is acknowledged that landscape and visual impacts weigh against the Proposed Project, these should be afforded **moderate to great negative weight** in the planning balance, given the CNP to deliver low carbon infrastructure and the localised landscape and visual impacts.

### Agriculture and Soils

9.2.53 There will be permanent loss of 11.45 ha of BMV land in Suffolk and 12.21 ha of BMV land in Kent resulting from construction activities for the Proposed Project. This should be afforded **limited negative weight** in the planning balance.

### Intra-Project cumulative effects

9.2.54 As a result of the operational phase of the Suffolk Onshore Scheme, there will be a residual significant adverse intra-project cumulative effect for transport users as several visual amenity effects were assessed as significant for people using cycle paths, roads and rail and there will be several temporary and permanent PRoW diversions and closures. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor, the combination of all these impacts could have a significant adverse effect upon transport users.

9.2.55 There is also a potential for residual significant adverse intra-project cumulative effects upon some residential receptors where Friston Substation is built as part of the Proposed Project, as a result of significant visual effects combined with minor noise, and health and wellbeing effects, during operation.

9.2.56 This should be afforded **moderate negative weight** in the planning balance.

9.2.57 No significant adverse intra-project cumulative effects are predicted to occur from the Kent Onshore Scheme during operation.

### Inter-Project cumulative effects

9.2.58 Significant cumulative effects on landscape and visual receptors are expected from the combined effects of the Suffolk Onshore Scheme with EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector at all project stages. The landscape effects are localised, with only Landscape Character Area (LCA) L1 expected to experience significant effects. Total cumulative effects on representative viewpoints have the potential to be significant as a result of the combined effects primarily from the Suffolk Onshore Scheme with EA1N and EA2 Offshore Windfarms and LionLink Offshore Interconnector developments for various viewpoints at all project stages. This should be given a **moderate negative weight** in the planning balance.

9.2.59 As explained in Section 7.16 of this Planning Statement, the landscape and visual inter-cumulative effects of the Suffolk Onshore Scheme are also a result of National Grid's coordination efforts with other projects. The importance of coordination is highlighted in NPS EN-1, NPS EN-3 and NPS EN-5) and by Suffolk County Council and East Suffolk Council. National Grid has therefore considered the possibility of co-locating converter

stations, sharing cable corridors and consolidating landfalls as part of the exploration of coordination with other projects. Further information on coordination is available in **Application Document 7.10 Coordination Document.**

9.2.60 There is the potential for significant total cumulative effect on Landscape Character Area (LCA) E1 Stour Marshes, when considering the total potential cumulative effect of all the other developments in Kent combined with the Kent Onshore Scheme. The concentration of energy related development close to and within Richborough Energy Park, whilst occupying the less sensitive part of LCA E1, would have the potential to result in a small and peripheral part of LCA E1 becoming an energy-focused landscape, rather than exhibiting characteristics of the wider marshes. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to the eastern periphery of LCA E1. The remaining part of the LCA would not experience significant total cumulative effects. This should be given a **moderate negative** weight in the planning balance.

9.2.61 Both the Suffolk and Kent Onshore Schemes will result in significant cumulative effects in relation to soils and BMV land as a result of the temporary disturbance and the temporary and permanent loss of BMV land associated with each of the other developments in isolation and when combined. However, there is no additional mitigation apart from that set out in **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk**, **Application Document 7.5.10.2 Outline Soil Management Plan – Kent** and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP.** This should be afforded **limited negative weight** in the planning balance.

### Planning Balance Summary

9.2.62 As demonstrated in Sections 6, 7 and 8 of this Planning Statement and above, the key adverse impacts of the Proposed Project relate to less than substantial harm to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land, intra- and inter-project cumulative effects.

9.2.63 By contrast the benefits of the Proposed Project are substantial in terms of its contribution to the transition to net zero and moderate in terms of ecology and nature conservation, leading to a balance in favour granting development consent for the Proposed Project. In terms of the Subsection 104(7), it is considered that the benefits of the Proposed Project outweighs its adverse impacts.

## 9.3 Section 104(4) to (8) of the PA 2008: other exceptions

9.3.1 In addition to Section 104(7), there are other exceptions which apply to the SoS's decision under Section 104(3) which are set out section 104(4), 104(5), 104(6) and 104(8) of the PA 2008.

9.3.2 Section 104(4) applies if deciding an application in accordance with any relevant national policy statement would lead to the UK being in breach of any of its international obligations. There is no evidence to suggest that the granting of the DCO for the Proposed Project would lead to the UK being in breach of any of its international obligations.

9.3.3 Section 104(5) applies if deciding an application in accordance with any relevant national policy statement would lead to the SoS being in breach of any duty imposed on

the SoS by or under any enactment. There is no evidence to suggest that the granting of the DCO for the Proposed Project would lead the SoS to be in breach of any such duty.

9.3.4 Section 104(6) applies if deciding an application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment. There is no evidence to suggest that the granting of the DCO for the Proposed Project would be unlawful by virtue of any enactment.

9.3.5 Section 104(8) applies if any condition prescribed for deciding an application otherwise in accordance with an national policy statement is met. There is no evidence to suggest that any condition is met in relation to the Proposed Project.

9.3.6 Based on the above, subsections 104(4), (5), (6) and (8) of the PA 2008 (H.M Government, 2008) (H.M Government, 2008) are not engaged with respect to the Proposed Project and therefore do not apply to the SoS's decision to grant development consent for the Proposed Project.

## 9.4 Section 104(2) of the PA 2008: regard had in the SoS's decision

9.4.1 In making the decision under Section 104(3) of the PA 2008 the SoS must have regard to any relevant national policy statement; the appropriate marine policy documents; Local impact reports; Prescribed matters; and any other matters which the SoS thinks are both important and relevant to the decision.

9.4.2 Section 9.2 above summarises the Proposed Project's compliance with the relevant NPSs with detailed compliance presented in sections 6,7, 8 and Appendix A of this Planning Statement.

9.4.3 The appropriate marine policy documents relevant to the Proposed Project are the UK Marine Policy Statement (H.M Government, 2011), the East Inshore and East Offshore Marine Plans (DEFRA, 2014) and the South East Inshore Marine Plan (DEFRA, 2021). Appendix B MPS and Marine Plans Accordance Table of this Planning Statement demonstrates that the Proposed Project is in accordance with the Marine Policy Statement and the relevant Marine Plans.

9.4.4 Local Impact Reports are expected to be prepared by the host authorities (Suffolk County Council, East Suffolk Council, Kent County Council, Thanet District Council and Dover District Council) for the examination of the Application. The Proposed Project is in accordance with local policy to the extent that itis important and relevant, as demonstrated in Appendix C of this Planning Statement.

9.4.5 In terms of prescribed matters, it has been demonstrated that a decision to grant a DCO for the Proposed Project would have regard to the matters prescribed by Regulations 3, 3A and 7 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (HM Government, 2010). In relation to Regulation 3, the Proposed Project has regard to preserving heritage assets and their setting as set out in Sections 7.5 and 8.4 and Appendix E of this Planning Statement and **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage, Application Document 6.2.3.3 Part 2 Kent Chapter 3 Cultural Heritage** and **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**.

9.4.6 In relation to Regulation 3A, the need to protect the environment, the need to protect human health and the need to prevent interference with legitimate uses of the sea are

addressed throughout Sections 6, 7 and 8 of this Planning Statement, as well as **Volume 6 Environmental Statement** (including **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing, Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** and **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users).**

9.4.7 In relation to Regulation 7, biodiversity conservation and enhancement is addressed in Sections 7.4 and 8.3 of this Planning Statement and **Application Document 6.2.2.3 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**, **Application Document 6.2.3.3 Part 3 Kent Chapter 2 Ecology and Biodiversity, 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 Marine Chapter 5 Ornithology**.

9.4.8 This Planning Statement provides evidence of the Proposed Project's compliance with the relevant prescribed matters and relevant policy and other matters National Grid considers are likely to be important and relevant, to inform the SoS's decision as to whether to grant a DCO for the Proposed Project.

## 9.5 Conclusion

9.5.1 This Planning Statement has demonstrated that the Proposed Project is in accordance with NPS EN-1, NPS EN-3 and NPS EN-5. Paragraph 4.1.3 of NPS EN-1 sets out a presumption in favour of granting consent for energy NSIPs. There is also a presumption that the urgent need for CNP infrastructure, such as the Proposed Project, will "*in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy*" (paragraph 4.1.7). The Proposed Project will help meet the urgent need for CNP infrastructure to meet "*energy objectives, together with the national security, economic, commercial, and net zero benefits*" (Paragraph 3.3.63 of NPS EN-1 (DESNZ, 2024)).

9.5.2 None of the limited exceptions in Section 104(4)-(8) of the PA 2008 apply to the decision to be made by the SoS to grant development consent for the Proposed Project. In particular, the adverse impacts that should be afforded weight against the Proposed Project relate to less than substantial harm to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land and intra- and inter-project cumulative effects. These impacts are significantly outweighed by the very substantial public interest benefits of the Proposed Project. The extent of residual effects are limited given the nature of the project and the principle that all NSIPs will result in significant adverse effects.

9.5.3 As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Proposed Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia and the South East.

9.5.4 It is clear that there is a compelling case and established need for the Proposed Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development.

9.5.5 The Proposed Project will also deliver other more localised socio-economic and environmental benefits. These include significant ecological enhancements and employment generation during construction.

9.5.6 The analysis of planning policy compliance demonstrates that the need for the Proposed Project is supported by national planning policy, marine policy and other national energy and environmental policy, and that the Proposed Project addresses relevant national, marine and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

9.5.7 In terms of the overall planning balance, the clear and substantial benefits of the Proposed Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.

9.5.8 This Planning Statement has demonstrated that the Proposed Project is in accordance with the relevant national policy statements and local policy considered to be important and relevant and that substantial weight should be given to need when considering applications for consent under the PA 2008. Given the above, there is a clear and compelling case for the Sea Link DCO to be made.

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# Appendix A National Policy Accordance Tables

## Appendix Table A.1 Overarching National Policy Statement for Energy (NPS EN-1)

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| **Chapter 1: Introduction** | | |
| ***1.1 Background*** | | |
| **1.1.2** | It has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. For such applications this NPS, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State. | This accordance table and Section 9 of the Planning Statement concludes compliance with NPS EN-1 and other relevant NPSs. The extent and nature of the residual impacts do not trigger the exceptional circumstances set out in national planning policy to refuse consent with the presumption firmly engaged in favour of granting development consent, to deliver CNP infrastructure. leading to an overwhelming balance in favour of granting development consent for the Proposed Project. In terms of Section 104(7), the benefits of the Proposed Project clearly and decisively outweigh its limited adverse impacts. |
| **1.1.4** | The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would:<br>• lead to the UK being in breach of its international obligations<br>• be in breach of any statutory duty that applies to the Secretary of State<br>• be unlawful<br>• result in adverse impacts from the development outweighing the benefits | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| | • be contrary to regulations about how its decisions are to be taken | |
| **Chapter 2: Government policy on energy and energy infrastructure development** | | |
| ***2.3 Meeting net zero*** | | |
| **2.3.3** | Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system. | **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **the Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target. The reinforcement will also support security and reliability of supply, in accordance with paragraph 2.3.3. 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. Sea Link would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately contributing towards achieving net zero.<br><br>The wider socio-economic benefits of the Proposed Project are set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism.** The Suffolk Onshore Scheme and Kent Onshore Scheme will require a direct and indirect workforce during the construction, operation and maintenance, and decommissioning of the Proposed Project. During construction, the Suffolk Onshore Scheme will require a peak workforce of 327 FTE staff with an average of 86 gross direct FTE, whilst the Kent Onshore Scheme will require a peak workforce of 241 FTE staff, with an average of 86 gross direct FTE. Further to this, it is expected that the temporary annual employment generated by the |
| **2.3.4** | Meeting these objectives necessitates a significant amount of new energy infrastructure, both large national significant developments and small-scale developments determined at a local scale. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains. | |
| **2.3.5** | The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| | Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources. | Suffolk Onshore Scheme and Kent Onshore Scheme accounting for leakage, displacement and multiplier effects would support, on average, 65 and 50 total net jobs per annum for the Suffolk and Kent Onshore Scheme, respectively, during the construction phase. Out of the workforce generated by the by the Suffolk Onshore Scheme and Kent Onshore Scheme, 30% are expected to be from within the 60 minute drive time study area. |
| **2.3.6** | We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it. | |
| **2.3.7** | Decarbonisation means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity. | This paragraph emphasises that, in addition to the need to decarbonise existing electricity supplies, a substantial increase (double by 2050) in the total electricity generated to enable decarbonisation across all sectors is needed. The Proposed Project is designed to support this increasing demand for electricity, as set out in **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **the Planning Statement**. |
| ***2.6 Sustainable Development*** | | |
| **2.6.5** | Whatever incentives, rules or other signals developers are responding to, the government believes that the NPSs set out planning policies which both respect the principles of sustainable development and can facilitate, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and low carbon supplies of energy. | The reinforcement provided by the Proposed Project will ensure we have sufficient infrastructure to support the transition to net zero and therefore the Proposed Project will support the climate change objectives of maintaining safe, secure, affordable and low carbon supplies of energy in accordance with paragraph 2.6.5. |
| **Chapter 3: The need for new nationally significant energy infrastructure projects** | | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| *3.1 Introduction* | | |
| **3.1.1** | This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. | National Grid notes that, in accordance with paragraph 3.1.1, the need for infrastructure such as the Proposed Project is established, it is urgent and substantial weight should be given to this need when considering the application for development consent. |
| ***3.1.2*** | However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS. | It is recognised that there may be some significant residual impacts associated with large-scale energy infrastructure. The Application is accompanied by an **Environmental Statement (ES) (Application Document 6.2)** which provides the final assessment of the likely significant effects associated with the Proposed Project during its construction, operation and decommissioning. Section 9 of **the Planning Statement** explains that the significant residual adverse impacts of the Proposed Project are limited. |
| *3.2 Secretary of State decision making* | | |
| **3.2.6** | The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part. | National Grid notes that, in accordance with this policy, the need for infrastructure such as the Proposed Project is established, it is urgent and substantial weight should be given to this need when considering the application for development consent. **Application Document 7.2 Strategic Options Back Check Report** submitted with the DCO Application and Section 5 of **the Planning Statement** clearly set out the need for the Proposed Project. In accordance with s104 of the Planning Act (2008), the application will be determined in accordance with the NPS as primary policy for decision making and the NPS recognises that the need for the Proposed Project is demonstrated. |
| **3.2.7** | In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. | |
| **3.2.8** | The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS. | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| **3.2.11** | Where an energy infrastructure project is not covered by sections 15-21 of the Planning Act 2008 but is considered to be nationally significant, there is a power under section 35 of the Planning Act 2008 (which applies in England, English waters, and the Renewable Energy Zone, except any part of the Renewable Energy Zone in relation to which the Scottish Ministers have functions) for the Secretary of State, on request, to give a direction that a development should be treated as a nationally significant infrastructure project for which development consent is required. This could include novel technologies or processes which may emerge during the life of this NPS. | By way of letter dated 31 March 2022, the SoS made a Direction under section 35 of the Planning Act 2008 that the Proposed Project should be treated as a development for which development consent under the Planning Act 2008 is required. Further detail is set out in Section 1.3 of **the Planning Statement**. |
| **3.2.12** | In these circumstances any application for development consent would need to be considered in accordance with this NPS. In particular:…<br>• where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.83 of this NPS. | This paragraph confirms that the Proposed Project should be considered in accordance with NPS EN-1 and that substantial weight should be given to the need. |
| ***3.3 The need for new nationally significant electricity infrastructure*** | | |
| **3.3.3** | To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon | As explained in the **Strategic Options Report** (**Application Document 7.2 Strategic Options Back Check Report**) and in Section 5 of **the Planning Statement**, the Proposed Project will help to meet the demand for energy by increasing the capability of the electricity network to carry low-carbon and renewable energy from where it is generated to homes and businesses across the country.<br>The Proposed Project will be a critical enabler of the clean energy transition. However, the scale and pace of investment needed to |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| | electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050. | meet the UK's decarbonisation targets are significant and urgent; for example, achieving the ambition of up to 50 GW offshore wind by 2030 requires industry to deliver over six times the amount of electricity transmission network infrastructure in the next eight years than has been built in the past 30 years.<br><br>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 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.<br><br>Paragraph 4.2.5 of NPS EN-1 confirms that the Proposed Project, which is defined as a bootstrap and is directed into the NSIP regime under section 35 of the Planning Act 2008, comprises CNP Infrastructure. Section 9 of the Planning Statement summarises how the urgent need for CNP infrastructure to achieving energy objectives and other benefits outweighs the Proposed Project's impacts which are residual following the application of the mitigation hierarchy.<br><br>Regarding consideration of future demand, as explained in **Application Document 7.10 Coordination Document,** this has been demonstrated by coordination in project development through the process of routing and siting and design development. This has included exploring the concept of co-locating converter stations, sharing cable corridors and landfalls with other projects. The design for the Suffolk Onshore Scheme takes account of the potential requirements of future projects, including by leaving |
| **3.3.4** | There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation. | |
| **3.3.16** | If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon. | |
| **3.3.35** | In considering applications, applicants are expected to consider foreseeable future demand when considering the location and route of their investments. This may involve consenting offshore platforms, converter stations or substations which facilitate future coordination | |
| **3.3.63** | Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| **3.3.65** | There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives. | space north of the landfall, and the HVAC and HVDC cable routes for up to two other projects (depending on their requirements) and selecting a Converter Station Site that is positioned so that the immediately adjacent sites can accommodate up to two further converter stations. For the co-location of converter stations this is illustrated in **Application Document 7.10.1 NGV Coordination Masterplan.** |
| **3.3.66** | The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts. | |
| **3.3.68** | The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England; substantial reinforcement in London and the South of England to allow for Europe-bound export of excess wind generation from Scotland and the North of England, as well as the importation of energy from Europe to increase resilience during any periods which may be affected by intermittent energy generation mix and as part of the country's transition to increased energy security; and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England). | |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| **3.3.71** | The historical approach to connecting offshore wind resulted in individual radial connections developed project-by-project. This may continue to be the most appropriate approach for some areas with single offshore wind projects that are not located in the vicinity of other offshore wind and / or offshore infrastructure that is planned or foreseen in the near future. For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered. For these areas, this approach is likely to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point-to-point connections for each windfarm | National Grid has coordinated with other projects through the process of routeing and siting and design development, as set out in **Application Document 7.10 Coordination Document**.<br><br>The Proposed Project has considered the potential for colocation when selecting the landfall at Aldeburgh and has designed this, and the onward HVDC cable corridor, in a way that leaves sufficient space for up to two other projects to be constructed to the north, broadly along the same corridor and using the same landfall.<br><br>National Grid has coordinated with other projects at the project development stage for the Offshore element of the Proposed Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. Further details on this process are available in **Application Document 7.10 Coordination Document**. |
| **3.3.72** | Connecting the volume of offshore wind capacity targeted by the government will require not only new offshore transmission infrastructure but also reinforcement to the onshore transmission network, to accommodate the increased power flows to regional demand centres. | 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, including offshore |

| Paragraph | Policy Requirement | Compliance with policy |
|---|---|---|
| **3.3.73** | Due to the time required to plan, approve and construct the required new onshore transmission infrastructure, to date the completion of these onshore reinforcements has often taken longer than the completion of the offshore wind farms for which they are being built. This could present a material barrier to the delivery of UK Government ambition to deliver up to 50GW of offshore wind by 2030. | wind. 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. |
| **3.3.78** | Further to the needs case above, it is recognised that the case for a new connection or network reinforcement is demonstrated if the proposed development represents an efficient and economical means of:<br>• connecting a new generating station or storage facility to the network<br>• reinforcing the network to accommodate such connections, or<br>• reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand.<br>In considering the 'economic and efficient' approach the network project needs to follow good design, avoidance and mitigation principles (and / or biodiversity compensation where needed for transmission in the marine environment), as referenced in EN-5. | At multiple stages of the options appraisal process, National Grid has carried out assessments which consider the efficiency and the economic benefits of the Proposed Project. This process is set out in the **Strategic Options Report (Application Document 7.2 Strategic Options Back Check Report)**. This demonstrates that the Proposed Project is an efficient and economical means of reinforcing the network.<br>**The Funding Statement (Application Document 4.1)** explains how the Proposed Project generally is to be funded.<br>Section 6.3 of the **Planning Statement** provides an assessment of the Proposed Project against the "*criteria for good design for Energy Infrastructure"* contained in Part 4.7 of NPS EN-1.<br>The Application is accompanied by an **Environmental Statement (ES) (Application Document 6.2)** which provides the final assessment of the likely significant effects, associated with the Proposed Project during its construction, operation and decommissioning, after the mitigation hierarchy has been applied. |
| **3.3.79** | Moreover, given the crucial role of networks in connecting all of the other kinds of electricity infrastructure described above, it is especially important that the Secretary of State considers network projects as elements of a coherent and strategically necessary system, whether or not they are linked together in specific NSIPs. For instance, when | As explained in the **Strategic Options Report** (**Application Document 7.2 Strategic Options Back Check Report**) and in Section 5 of the **Planning Statement**, the Proposed Project will help to meet the demand for energy by increasing the capability of the electricity network to carry low-carbon and renewable energy from where it is generated to homes and businesses across the |

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| | evaluating applications for new electricity networks infrastructure the Secretary of State should have regard to the fact that given,<br>i) the government's strategic commitment to ambitious levels of interconnection capacity and offshore wind generation, and<br>ii) the tightly interdependent infrastructure chain linking interconnection and offshore generation with onshore demand centres,<br>delays in the approval of associated new network developments could cause significant economic waste and set back the strategically vital goals of decarbonisation and energy security. | country and therefore the Proposed Project is strategically necessary and vital.<br>Energy networks will be a critical enabler of the clean energy transition. However, the scale and pace of investment needed to meet the UK's decarbonisation targets are significant; for example, achieving the ambition of up to 50 GW offshore wind by 2030 requires industry to deliver over six times the amount of electricity transmission network infrastructure in the next eight years than has been built in the past 30 years. The Proposed Project should be considered on the basis that it is urgent.<br>Regarding coordination, National Grid has coordinated with other projects through the process of routing and siting and design development, as set out in **Application Document 7.10 Coordination Document**. This has included choosing a shared point of connection and exploring the concept of co-locating converter stations, sharing cable corridors and landfalls to where practicable provide the highest degree of consumer, environmental, and community benefits.<br>National Grid has coordinated with other projects at the project development stage for the Offshore element of the Proposed Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more |
| **3.3.80** | Related to the above and considering the potential for unwarranted and avoidable disruption, inefficiency, and visual impacts along the onshore – offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits. | |
| **3.3.81** | The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits. | |
| **3.3.83** | Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to | |

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| | be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy. | detailed design and consenting strategy was not progressed. Further details on this process are available in **Application Document 7.10 Coordination Document.**<br>This demonstrates the urgent need for the Proposed Project and the offshore windfarms and that the timeline for these projects to be delivered has limited the ability of the Proposed Project to coordinate offshore but it has nonetheless been considered. |
| **Chapter 4: Assessment Principles** | | |
| ***4.1 General Policies and Considerations*** | | |
| **4.1.3** | Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. | Section 104(3) of the Planning Act 2008 sets out that an application for development consent should be determined in accordance with the relevant NPS except to the extent that to do so would contravene matters, referred to at paragraph 1.1.4 of NPS EN-1 and set out in subsections (4) to (8) of the Planning Act 2008. It is not considered that any of these limited circumstances would apply, therefore the application will be assessed against the relevant NPS, any local impact report (LIR) and any other matters that the SoS thinks are both important and relevant to the decision.<br>The level of urgency for the Proposed Project is set out in Section 5 of **the Planning Statement** and the **Strategic Options Report (Application Document 7.2 Strategic Options Back Check Report).** The presumption in favour is firmly engaged. |
| **4.1.4** | The presumption is also subject to the provisions of the Planning Act 2008 referred to at paragraph 1.1.4 of this NPS. | |
| **4.1.5** | In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:<br>• its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, | Section 9 of the **Planning Statement** presents the planning balance explaining the weight given to the adverse impacts of the Proposed Project and its benefits. As demonstrated in Sections 6, 7 and 8 of the **Planning Statement**, the key adverse impacts of the Proposed Project relate to localised significant effects upon landscape and visual receptors, loss of BMV land, intra and inter-project cumulative effects which are outweighed by the Proposed Project's benefits which include employment generation, |

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| | environmental enhancements, and any long-term or wider benefits<br>• its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy | contribution to the local economy during construction, landscape and ecological enhancements and the safeguarding of land within the Order limits for future improvements to PRoW from other projects.The design development of the Proposed Project has followed the mitigation hierarchy and all residual effects have been reduced as far as practicable through good design and management of impacts through a suite of management plans secured via the draft DCO. |
| **4.1.6** | In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1). | The environmental, social and economic benefits of the Proposed Project are set out in Section 5 of the **Planning Statement**. The adverse impacts of the Proposed Project are set out in the appraisal Sections (i.e., 6, 7 and 8) of the **Planning Statement**. These take into account of impacts and benefits at national, regional and local levels. The benefits of the Proposed Project are weighed against its adverse impacts in the Planning Balance in Section 9 of the **Planning Statement.** |
| **4.1.7** | Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development.<br>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an | None of these exceptional circumstances set out in paragraph 4.1.7 apply with the presumption for granting development consent remaining firmly engaged even after considering any residual adverse effects following the application of the mitigation hierarchy, with the need case outweighing the residual effects. This policy makes it clear that a strong weight should be attached to the CNP Infrastructure in the planning balance (the need case for CNP Infrastructure will outweigh residual effects in all but the most exceptional cases). Paragraph 4.2.5 of NPS EN-1 confirms that the Proposed Project, which is defined as a bootstrap and is directed into the NSIP regime under section 35 of the Planning Act 2008, comprises CNP Infrastructure. The Planning Balance is presented in Section 9 of the **Planning Statement.** |

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| | unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. | |
| **4.1.12** | Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework. | National Grid has identified Development Plan documents that may be considered both important and relevant by the SoS. Policies relevant to the assessments contained in the **ES (Application Document 6.2)** are referred to in **Application Document 6.2.1.2 Part 1 Introduction Chapter 2 Regulatory and Planning Context.**<br><br>Development Plan documents and emerging plans have also been considered in the Planning Statement, which provides an assessment of the Proposed Project's compliance with the relevant policies contained in these documents. This is detailed in Appendix C Local Policy Accordance Table. Where there is conflict between Development Plan documents and an NPS, this has been recognised in the appraisal Sections (6, 7, and 8) of the Planning Statement, however, it has been noted that the NPS prevails for the purpose of decision making. |
| **4.1.13** | Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded. | |
| **4.1.14** | The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it. | |
| **4.1.15** | In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure. | |
| **4.1.16** | The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. | The Application is accompanied by a **draft DCO** (**Application Document 3.1**) **Application Document 3.2 Explanatory Memorandum** to the draft DCO. The draft DCO, while it may be subject to amendments throughout the examination, sets out the requirements in respect of the construction, operation and decommissioning of the Proposed Project. The Requirements and their suggested reason for imposition are also explained in the draft DCO **Explanatory Memorandum** (**Application Document 3.2**). The proposed Requirements have been considered against |
| **4.1.17** | The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate. | |

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| | | the tests for planning conditions as set out in the NPPF and NPPG. |
| **4.1.18** | The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. | It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies |
| **4.1.19** | Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State. | The **Consultation Report (Application Document 5.1)** provides a complete overview of the consultation and stakeholder engagement activities on the Proposed Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008. |
| **4.1.22** | Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this, or other energy NPSs, and the reasons why financial viability or technical feasibility is likely to be of relevance explained). | At multiple stages of the options appraisal process, National Grid has carried out assessments on the financial and technical viability of the Proposed Project. This process is set out in **Application Document 7.2 Strategic Options Back Check Report. Application Document 4.1** Funding Statement explains how the Proposed Project generally is to be funded. |

***4.2 The critical national priority for low carbon infrastructure***

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| **4.2.4** | Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. | Paragraph 4.2.5 confirms that the Proposed Project, which is defined as a bootstrap and is directed into the NSIP regime under section 35 of the Planning Act 2008, comprises CNP Infrastructure. In accordance with paragraph 4.2.6, this confirms that in terms of decision making that the overarching need case and substantial weight which should be given to this is the starting point for the assessment of the Proposed Project. Further detail is set out in Section 1.3 of **the Planning Statement**. |
| **4.2.5** | This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: (…)<br>- for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore (…) | |
| **4.2.6** | The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications. | |
| **4.2.7** | The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State | The **ES (Application Document 6.2)** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Proposed Project.<br>Section 9 of the **Planning Statement** presents the planning balance explaining the weight given to the adverse impacts of the Proposed Project and its benefits. As demonstrated in Sections 6, 7 and 8 of the **Planning Statement**, the key adverse impacts of the Proposed Project relate to localised significant effects upon landscape and visual receptors, loss of BMV land, intra and inter-project cumulative effects which are outweighed by the Proposed Project's benefits. |
| **4.2.8** | During decision making, the CNP policy will influence how non-HRA and non- MCZ residual impacts are considered | The Proposed Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider |

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| | in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2. | making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. |
| **4.2.10** | Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. | **The Planning Statement** sets out how the Application meets the requirements of the designated NPS (EN-1, EN-3 and EN-5), whilst the **ES (Application Document 6.2)** assesses the potential environmental impacts of the Proposed Project.<br>The **ES (Application Document 6.2)** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Proposed Project.<br>**Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project. It outlines how the design choices have sought to reduce the environmental effects of the Proposed Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. The report also explains the changes that were made to the Proposed Project as a result of feedback from the consultation process. The process of reviewing and responding to consultation feedback is explained in **Application Document 5.1 Consultation Report.** This includes engagement with Natural England which was undertaken during the statutory consultation and following this with several meetings being held.<br>**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, records all the commitments made by National Grid during the iterative development of the designs of the Proposed Project. This sets out how mitigation will be secured and |
| **4.2.11** | Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. | |
| **4.2.12** | Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered. | |

monitored. It includes embedded measures, which are intrinsic to the design submitted as part of the Application for development consent and good practice measures outlined within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (COCP),** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. It also includes the additional mitigation measures that have been identified through the EIA to avoid or reduce likely significant environmental effects.

As outlined in **Application Document 7.5.2 Offshore Construction Environmental Management Plan (CEMP)** and **Application Document 7.5.3 Onshore CEMP** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** National Grid will put in place robust procedures to audit and inspect the Proposed Project, including its supply chain of contractors, to make sure the control measures set out in the REAC are adopted when constructing the project. The REAC will apply to all areas of the Proposed Project delivered pursuant to the DCO and the contractor(s) will be expected to demonstrate compliance with these measures.

A) The cumulative impacts resulting from the Proposed Project are assessed in the following documents:
   - **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project;**
   - **Application Document Number 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects;**
   - **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Inter-Project Cumulative Effects;**

- **Application Document Number 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects; and**
- **Application Document Number 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.**

The majority of the residual significant cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature.

Significant residual cumulative effects on landscape and visual receptors are expected from the combined effects of the Suffolk Onshore Scheme with East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector at all project stages. The landscape effects are localised, with only Landscape Character Area (LCA) L1 expected to experience significant effects. Total cumulative effects on representative viewpoints have the potential to be significant as a result of the combined effects of East Anglia ONE and TWO Offshore Windfarms only on one viewpoint (viewpoint 6) during operation, and with LionLink Offhsore Interconnector on a number of viewpoints (viewpoints 1 – 7, 15 – 17, 19 – 21) at all project stages.

There is the potential for a residual significant total cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1, which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby

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| | | limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.<br><br>The only permanent significant cumulative effect identified for both the Suffolk and Kent Onshore Schemes for which no additional mitigation can be provided is the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk, Application Document 7.5.10.2 Outline Soil Management Plan - Kent,** and **Application Document 7.5.3.1 CEMP Appendix A Outline COCP** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| ***Non-HRA and non-MCZ residual impacts of CNP Infrastructure*** | | |
| **4.2.15** | Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. | It is acknowledged in these paragraphs that residual non-HRA and non-MCZ impacts are unlikely to outweigh the urgent need for CNP Infrastructure in all but the most exceptional circumstances. As set out in section 9 of the Planning Statement and summarised below, none of the circumstances in paragraph 4.2.17 of NPS EN-1 result in the presumption in favour to be disengaged.<br><br>Paragraph 4.2.17 includes a non-exhaustive list of such tests. **Section 9** of the **Planning Statement** sets out how the Proposed Project has met the exceptional circumstances tests listed in paragraph 4.2.17.<br><br>The Proposed Project does not include any proposals to build on designated Green Belt therefore very special circumstances are not applicable to justify the Proposed Project. The Order Limits pass through or are located close to the Minsmere_Walverswick SSSI, the Sandwich Bay to Haskinge Marshes SSSI and the Leiston-Aldeburgh SSSI, which link with and form part of European Sites (SPA/Ramsar). **Application Document 6.2.2.3 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** present the assessment of the likely significant |
| **4.2.16** | As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a | |

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| | clear outweighing of harm, exceptionality or very special circumstances. | ecology and biodiversity effects that could result from the Proposed Project. |
| 4.2.17 | This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:<br>-where development within a Green Belt requires very special circumstances to justify development;<br>-where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs.<br>-where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and<br>-where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. | **Application Document 6.6 Habitats Regulations Assessment Report** (HRA) is provided presents with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of these sites. Several potential pathways for LSEs on these Sites were confirmed. However. following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project, the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any of the European sites or the SSSIs. Therefore, there is no need to balance the impact of the Proposed Project on the network of SSSIs against the benefits of the Proposed Project due to embedded design ensuring that no adverse impacts arise.<br>The Order Limits for the Suffolk Onshore Scheme (landfall and HVDC cable) go through the Suffolk Coast and Heaths National Landscape. Paragraph 4.2.17 and 5.10.32 in NPS EN-1 confirms that development consent in nationally designated landscapes can only be granted in exceptional circumstances and should be demonstrated to be in the public interest. Paragraph 5.10.33 of NPS EN-1confirms that the SoS should ensure that any projects consented in these designated areas should be carried out to high environmental standards. It is considered that the Suffolk Onshore Scheme meets the tests set out in paragraph 5.10.32, as discussed below:<br>• The need for the development- Section 5 of the Planning Statement and the **Application Document 7.2 Strategic Options Back Check Report (Updated Needs Case)** explains that the Proposed Project will reinforce the transmission system in the South East of England and East Anglia. In summary, in accordance with NPS EN-1 the |

Proposed Project will provide infrastructure that is CNP where need is fully established and for which the presumption in favour of granting development consent is engaged.

- The cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way As set out in **Application Document 8.2 Historic Report 2 (Options Selection and Design Evolution)**, as the connection is required in the Sizewell area and the AONB extends along the coast without interruption from Felixstowe and Harwich in the south to Kessingland in the north, it is not possible to avoid this designation and meet the need case without a significantly longer and indirect route that would not be in accordance with National Grid's statutory duties.
- And any detrimental effect on the environment, the landscape and recreational opportunities-: detrimental effects on the environment, landscape and recreational opportunities within the AONB have been avoided through undergrounding and careful consideration of routeing and siting through the AONB

On the basis of the above, exceptional circumstances therefore exist to justify the proposed development in the Suffolk and Essex Heaths and Coast AONB. As demonstrated by the needs case, the Proposed Project would be in the public interest. Paragraph 5.10.33 and 5.10.35 are addressed elsewhere in this table however, it is considered that the Proposed Project would be in compliance with these tests.

With respect to heritage, the Proposed Project will not result in the loss of significance of designated heritage assets and a non-designated heritage asset of schedulable quality. This means that this exceptional test does not apply.

Based on the above, it is established that in the case of the Proposed Project, that any tests which require a clear outweighing

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| | | or harm, exceptionally or in very special circumstances have been met. National Grid has set out in Section 9 of the **Planning Statement** that the benefits of the Proposed Development clearly and demonstrably outweigh residual adverse effects after the implementation of mitigation measures. The Proposed Project is in accordance with the Energy NPSs and the CNP presumption of consent remains firmly engaged. |
| ***HRA derogations and MCZ assessments for CNP Infrastructure*** | | |
| **4.2.18** | Any HRA or MCZ residual impacts will continue to be considered under the framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively. | The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site. **Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary. |
| **4.2.19** | Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations. | |
| **4.2.20** | Similarly, if during an MCZ assessment, CNP Infrastructure has residual impacts which significantly risk hindering the achievement of the stated conservation objectives for the MCZ, the Secretary of State will consider making a derogation under section 126(7) of the Marine and Coastal Access Act 2009. | **Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected. |

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| **4.2.21** | For both derogations, the Secretary of State will consider the particular circumstances of any plan or project, but starting from the position that energy security and decarbonising the power sector to combat climate change:<br>• requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. This NPS imposes no limit on the number of CNP infrastructure projects that may be consented. Therefore, the fact that there are other potential plans or projects deliverable in different locations to meet the need for CNP Infrastructure is unlikely to be treated as an alternative solution. Further, the existence of another way of developing the proposed plan or project which results in a significantly lower generation capacity is unlikely to meet the objectives and therefore be treated as an alternative solution; and<br>• are capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs, and, for MCZ assessments, the benefit to the public is capable of outweighing the risk of environmental damage, for CNP Infrastructure. | The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only). The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs.<br>As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| ***4.3 Environmental Effects/Considerations*** | | |
| **4.3.1** | All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. | An **ES (Application Document 6.2)** has been submitted with the Application. It describes the aspects of the environment likely to be significantly affected by the Proposed Project. |
| **4.3.3** | The Regulations require an assessment of the likely significant effects of the proposed project on the | |

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| | environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. | |
| **4.3.5** | For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. | The **ES (Application Document 6.2)** covers the environmental, social and economic effects arising from construction, operation and decommissioning of the Proposed Project. |
| **4.3.9** | As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisitions and habitats sites. | There is no general requirement from a policy perspective to consider alternatives or to establish whether the Proposed Project represents the 'best option'. The Planning Statement and **Application Document 7.3 Design Development Report** set out how the Proposed Project accords with policies and legislation where consideration of alternatives may be relevant.<br>In addition, **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives studied, as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. |
| **4.3.15** | Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. | **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives studied, as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. |
| **4.3.19** | The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as | Intra-cumulative effects (sometimes referred to as combined or interactive effects) resulting from the Proposed Project are assessed in the following documents: |

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| | a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place. | • **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project;**<br>• **Application Document Number 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects; and**<br>• **Application Document Number 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects.**<br><br>The majority of significant cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature. As a result of the operational phase of the Suffolk Onshore Scheme, there will be a residual significant adverse intra-project cumulative effect for transport users due to several visual amenity effects were assessed as significant for people using cycle paths, roads and rail and there will be a number of permanent and temporary Public Right of Way (PRoW) diversions and closures. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor, the combination of all these impacts could have a significant effect upon transport users.<br><br>No significant adverse intra-project cumulative effects are predicted to occur from the Kent Onshore Scheme during operation.<br><br>It is determined that the Offshore Scheme is in accordance with paragraph 4.3.19 of NPS EN-1 relating to the cumulative effects of the Proposed Project on marine receptors as there are considered to be no significant cumulative effects. |

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| **4.3.20** | The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act. | The **ES (Application Document 6.2)** covers impacts relating to biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas arising from construction, operation and decommissioning of the Proposed Project. The Environment Act 2021 and Environmental Improvement Plan 2023 are considered in Section 2.2 of the relevant topic chapters. |
| **4.3.22** | Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:<br>• the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner<br>• only alternatives that can meet the objectives of the proposed development need to be considered. | **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives studied, as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and this demonstrates compliance with policy being proportionate and only relating to alternatives that can meet the objectives of the Proposed Project. |
| ***4.4 Health*** | | |
| **4.4.1** | Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health. | **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Health and Wellbeing** and **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Health and Wellbeing** present an assessment of the likely significant health and wellbeing effects that could result from the Proposed Project. |

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| **4.4.4** | As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. | During the construction phase the Suffolk and Kent Onshore Scheme is expected to generate an average of 86 and 67 gross direct FTE jobs respectively as well as an average of 65 and 50 net additional jobs respectively. Additional employment provides health benefits as good quality work protects against social exclusion through the provision of income, social interaction, identity and purpose. |
| **4.4.6** | Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole. | **Application Document 7.9 Equalities Impact Assessment** assesses the potential impacts of the Proposed Project on protected characteristic groups, as defined under the Equality Act 2010. The assessment considers how the consultation, construction, operation, and decommissioning phases of the Proposed Project may differentially or disproportionately affect these groups. The assessment concludes that, with the implementation of embedded and additional mitigation measures potential negative equality impacts arising due to the Proposed Project are not expected to be substantial in nature. |
| **4.4.7** | Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008. | With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at a Noise Sensitive Receptor (NSR) during construction, operation and |
| **4.4.8** | However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise. | |

decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with Best Practice Measures (BPM) being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.

The Suffolk Onshore Scheme and Kent Onshore Scheme have been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control and reduce the impact on health and wellbeing are set out in, **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** which will require the contractor(s) to undertake daily site inspections to check conformance to Management Plans, in relation to dust, waste, water and noise during construction. Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** including TT03, which will manage PRoWs, by only closing access to them for short periods during construction activities and providing diversions for users, so as to allow them to access open space and enjoy recreational spaces to help with personal health and wellbeing.

**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **Application Document 6.2.3.11 Part**

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| | | **3 Kent Chapter 11 Health and Wellbeing** assess various factors that can impact health and wellbeing such as impacts to air quality, noise and vibrations, transport (traffic and noise effects), open space, access to healthcare services and employment. Both assessments conclude, that with appropriate mitigation measures, there is to be no significant adverse effects on human health and wellbeing. |
| ***4.5 Marine Considerations*** | | |
| **4.5.8** | Applicants for a Development Consent Order must take account of any relevant Marine Plans and are expected to complete a Marine Plan assessment as part of their project development, using this information to support an application for development consent. | The Application includes a **Marine Plan Policy Assessment** (**Application Document 6.13**) and Appendix B Marine Policy Accordance Table of the **Planning Statement**, in accordance with paragraph 4.5.8, which reviews the Proposed Project against the Marine Policy Statement, South East Inshore Marine Plan and the East Inshore and Offshore Marine Plan. This assessment has not identified any conflict with relevant marine policies. |
| **4.5.9** | Applicants are encouraged to refer to Marine Plans at an early stage, such as in pre-application, to inform project planning, for example to avoid less favourable locations as a result of other uses or environmental constraints. | |
| **4.5.10** | Section 104(2)(aa) of the Planning Act 2008 requires the Secretary of State to have regard to any appropriate marine policy documents when making a decision on an application for a Development Consent Order where an NPS has effect. This will include any Marine Plan which is in effect for the relevant area, or areas where the project crosses the boundary between plan areas. | |
| **4.5.12** | In the event of a conflict between an NPS and any marine planning documents, the NPS prevails for purposes of decision making. | |
| ***4.6 Environmental and Biodiversity Net Gain*** | | |

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| **4.6.1** | Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements. | As set out in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**, the Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Proposed Project.<br>The **Design Development Report (Application Document 7.3)** provides an overview of the design rationale for the Proposed Project. It outlines how the design choices have sought to reduce the environmental effects of the Proposed Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. The report also explains the changes that were made to the Proposed Project as a result of feedback from the consultation process to further identify opportunities for enhancement.<br>Section 5 of the Planning Statement presents the proposed ecological enhancements included for as part of the Proposed Project design.<br>In addition, **Application Document 6.12 Biodiversity Net Gain Feasibility Report** states that National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies |
| **4.6.3** | Currently biodiversity net gain policy in England only applies to terrestrial and intertidal components of projects. Principles for Marine Net Gain are currently being rolled out by the Government, who will provide guidance in due course. There are provisions in the Environment Act 2021 | This paragraph confirms that Marine Net Gain is not currently required for the Offshore Scheme. |

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| | to allow Marine Net Gain to be made mandatory for NSIPs in the future | |
| **4.6.6** | Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible. | **Application Document 6.12 Biodiversity Net Gain Feasibility Report** is submitted with the Application and is aligned with the proposals of the **Outline Landscape and Ecology Management Plans (LEMP) (Application Documents 7.5.7.1 and 7.5.7.2)**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br>Section 5 of the Planning Statement presents the benefits of the Proposed Project including ecological enhancements.<br>As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report,** the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. In order to achieve minimum 10% net gain, an additional 257.47 units would be required for Area Units. For the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and for watercourse units. In order to achieve minimum 10% net gain, an additional 47.58 units would be required for hedgerows, 6.67 units for areas and 6.96 units for watercourses.<br>**Application Document 6.12 Biodiversity Net Gain Feasibility Report** sets out that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. The preferred route for BNG delivery is currently to work in partnership with third party landowners and relevant external organisations to deliver a more meaningful and targeted (i.e. to benefit protected and notable species within local biodiversity action plans) that may work towards any targets within the incoming Local Nature Recovery Strategy (LNRS) rather than provision of BNG within the Order Limits. |
| **4.6.7** | In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application. | |
| **4.6.11** | Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent. | |
| **4.6.13** | In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as<br>• reductions in GHG emissions,<br>• reduced flood risk,<br>• improvements to air or water quality,<br>• climate adaptation,<br>• landscape enhancement,<br>• increased access to natural greenspace or<br>• the enhancement, expansion or provision of trees and woodlands<br>The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants | |

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| | should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure. | It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. Detailed plans which must be substantially in accordance with the outline plans will be prepared post consent and these are secured by Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1**).<br><br>The **Application Document 7.5.3.2 CEMP Appendix B REAC** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** records all the commitments made by National Grid during the iterative development of the designs of the Proposed Project. It includes embedded measures, which are typically intrinsic to the design submitted as part of the application for development consent and good practice measures outlined with A**pplication Document 7.5.3.1 CEMP Appendix A Outline CoCP)** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. It also includes the additional mitigation measures that have been identified through the EIA to avoid or reduce likely significant environmental effects. |
| **4.6.15** | Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. | |
| **4.6.1 [*Appears to be a formatting error for paragraph numbers]** | Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. | |
| **4.6.3** | The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. | |
| ***4.7 Criteria for good design for Energy Infrastructure*** | | |
| **4.7.2** | Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to | The **Design Development Report (Application Document 7.3)** provides an overview of the design rationale for the Proposed Project and how the design choices have sought to reduce the environmental effects of the Proposed Project. It demonstrates that the design has embedded mitigation measures in order to avoid or reduce significant environmental effects where practicable. |

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| | which it can contribute to the enhancement of the quality of the area. | |
| **4.7.3** | Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. | |
| **4.7.4** | Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle. | As detailed in the **Design Development Report** (**Application Document 7.31**), the Proposed Project has undergone an iterative design process which has been informed by the outcomes of statutory consultation and stakeholder engagement, ongoing environmental assessments, engineering and design considerations, and collaboration with other developers.<br>**Application Document 7.12.1 Design Principles – Suffolk** and **Application Document 7.12.2 Design Principles – Kent** have been prepared to accompany the Application. They provide the guiding principles for the detailed design of the Proposed Project. |
| **4.7.5** | To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent. | |
| **4.7.7** | Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. | The **Design Development Report** (**Application Document 7.3**) provides an overview of the design rationale for the Proposed Project and how the design choices have sought to reduce the environmental effects of the Proposed Project. It demonstrates that the design has embedded mitigation measures in order to avoid or reduce significant environmental effects where practicable. |
| **4.7.8** | Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this | Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design** |

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| | service. Applicants should also consider any design guidance developed by the local planning authority. | **Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments. |
| **4.7.10** | In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be. | The **Design Development Report (Application Document 7.3)** provides a full account of the design process, demonstrating how through good design the Proposed Project will result in the creation of a sustainable development and explains how National Grid has considered both functionality and aesthetics having regard to the amenity and visual impacts.<br>The design principles, set out in **Application Document 7.12.1 Design Principles – Suffolk** and **Application Document 7.12.2 Design Principles – Kent**, include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent).<br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments. |
| **4.7.11** | In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible. | |
| **4.7.12** | In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as | The design principles, set out in **Application Document 7.12.1 Design Principles – Suffolk** and **Application Document 7.12.2 Design Principles – Kent**, include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in |

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| | landscape and environmental impacts, will be important factors in the design process. | Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things. |
| ***4.10 Climate Change Adaptation and Resilience*** | | |
| **4.10.8** | New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. | **Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** presents an assessment of the likely significant effects of the Proposed Project on the climate and climate change effects that affect the Proposed Project and surrounding environment.<br>Embedded mitigation measures have been integral in reducing, where possible avoiding, the climate change effects of the Proposed Project. These measures include sensitive routeing and siting of infrastructure and temporary works, use of low carbon construction techniques, use of materials with a low embodied carbon and commitments made within the **Application Document 7.5.3.2 CEMP Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br>A **Greenhouse Gas Management Plan** (**Application Document 7.5.13)** has been prepared and sets out how Greenhouse Gas (GHG) emissions are to be managed across the lifecycle of the Proposed Project. This plan includes the identification of opportunities for reducing GHG emissions, GHG reduction targets and allocation of responsibilities for associated actions and is secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft DCO** |
| **4.10.9** | The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations. | |
| **4.10.10** | Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time. | |
| **4.10.11** | Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results | The Lifecycle GHG Assessment has considered all GHG emissions from within the Order Limits arising during all stages of the construction, operation and decommissioning, as well as emissions from off-site activities. The Proposed Project will result in increased GHG emissions during construction and operation, |

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| | should be considered alongside relevant research which is based on the climate change projections. | which are estimated to contribute less than 0.01% of any respective UK carbon budget. The effect of the Proposed Project on the global climate is deemed to be minor adverse and not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Proposed Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels.<br>The Climate Change Resilience Assessment considers the impacts of climate change on the Proposed Project over its lifetime by identifying likely changes to the climate and potential climate hazards (including, increase winter precipitation, increase frequency and severity of extreme weather events, sea level rise and drought). This assessment has found that there are no significant climate change risks to the Proposed Project, assuming the embedded mitigation measures are successfully implemented into the design. The effect of climate change risk on the Proposed Project is therefore deemed to be not significant. |
| **4.10.13** | The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period. | |
| **4.10.15** | The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime | |
| ***4.12 Pollution Control and Other Environmental Regulatory Regimes*** | | |
| **4.12.7** | Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. | A **Consents and Agreements Position Statement (Application Document 3.5)** is submitted with the Application and sets out the required Environmental Permit applications and other licences and consents required for the Proposed Project. Engagement with the |

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| **4.12.8** | Wherever possible, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent. | Environment Agency and other key stakeholders to discuss requirements is ongoing. A deemed Marine Licence is included in the draft DCO. |
| **4.12.9** | In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves. | An **ES** (**Application Document 6.2**) has been submitted with the DCO Application.<br>**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** provide assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Suffolk Onshore Scheme and Kent Onshore Scheme. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**. The assessments conclude that during construction, operation and decommissioning phases the effects on air quality, generated by the Onshore Scheme would be negligible and therefore not significant.<br>Baseline assessments and preliminary contamination risk assessments (PRA) have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure of existing ground contamination through ground disturbance for both the Suffolk and Kent Onshore Scheme during construction and decommissioning. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk |

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| | | have been identified, further assessment has identified a very low/low risk to sensitive receptors. With good practice measures, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline COCP** secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** the impacts from existing ground contamination on construction workers is considered negligible.<br>Groundwater risk assessments have been undertaken for both Suffolk and Kent Onshore Schemes and are set out in **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**. The assessments conclude that there is a low/moderate risk of existing contamination within groundwater, that could be mobilised. However, with control and management measures set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP** the potential effects of groundwater contamination are expected to be minor due to mitigation measures |
| **4.12.11** | The Secretary of State's consent may include a deemed marine licence and the MMO, or NRW, will advise on what conditions should apply to the deemed marine licence. | A deemed Marine Licence is included in the draft DCO. Discussions have been undertaken with the MMO in relation to the draft conditions. |
| **4.12.14** | The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. | An **ES** (**Application Document 6.2**) has been submitted with the DCO Application which takes full account of the environmental impacts. |
| **4.12.16** | The Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution | With regards to noise pollutution, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** |

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| | control permits or licences or other consents will not subsequently be granted. On this basis, it is reasonable for the Secretary of State to consider residual amenity issues only when considering whether the development itself is an acceptable use of the land or sea, and on the impacts of that use. | present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br><br>Baseline assessments and PRA have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure to existing ground contamination through ground disturbance for both the Suffolk and Kent Onshore Scheme. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk have been identified, further assessment has identified a very low/low risk to sensitive receptors. |

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| | | Groundwater risk assessments have been undertaken for both Suffolk and Kent Onshore Scheme's and are set out in **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.** The assessments conclude that there is a low/moderate risk of existing contamination within groundwater, that could be mobilised. However, with control and management measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** the potential effects of groundwater contamination are expected to be minor due to mitigation.<br><br>Further contamination assessments were to ensure the Order Limits are suitable and safe for the Proposed Project. Ground gas monitoring and assessments undertaken by Mott Macdonald, identified no potential sources of ground gas exposure/disturbance within the Order Limits of the Suffolk Onshore Scheme and found a low risk of potential ground source gas exposure/disturbance in the Order Limits for the Kent Onshore Scheme.<br><br>**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assess the likely air quality effects that could results from both the Suffolk and Kent Onshore Schemes. Both documents assess the existing baseline conditions and the likely changes and effects to air quality levels following the construction, operation and maintenance and decommissioning of the Proposed Project. The overall assessment of the Onshore Scheme concludes that there are no likely significant adverse air quality effects. |
| ***4.13 Safety*** | | |

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| **4.13.5** | Applicants should consult with the HSE on matters relating to safety. | National Grid has consulted with the HSE. In its response to statutory consultation, the HSE considered matters within its remit and identified that the consultation Order Limits were not within the consultation zones of any major accident hazard sites or major accident hazard pipelines. |
| **4.13.6** | Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority. | The Proposed Project is not subject to the COMAH regulations. |
| **4.13.8** | The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objections. | |
| ***4.14 Hazardous Substances*** | | |
| **4.14.5** | Applicants must consult the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety. | Hazardous Substance Consent is not considered to be required for the Proposed Project. |
| **4.14.7** | Where hazardous substances consent is applied for, the Secretary of State will consider whether to make an order directing that hazardous substances consent shall be deemed to be granted alongside making an order granting development consent. The Secretary of State should consult HSE about this. | |
| ***4.15 Common Law Nuisance and Statutory Nuisance*** | | |
| **4.15.5** | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order | A **Statement of Statutory Nuisance (Application Document 6.7)** is submitted with the DCO Application. This assesses any possible sources of nuisance under section 79(1) of the EPA 1990. It is not expected that there would be a breach of Section |

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| | granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | 79(1) of the EPA 1990 during construction or operation. To reduce the risk of Statutory Nuisance occurring.<br>**Application Document 6.2**, **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan, Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice, Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk and Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent, Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk and Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan - Kent** specifically contains good practice measures to avoid or reduce potentially significant effects of dust, lighting, noise and vibration. These are secured through Requirement 6 of Schedule 3 of the draft DCO (**Application Document 3.1**). |
| **4.15.6** | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | |
| ***4.16 Security Considerations*** | | |
| **4.16.6** | Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. | **Application Document 6.2.1.4 Description of the Proposed Project** outlines security measures that have been incorporated into the design to ensure the assets are protected. This includes measures such as lighting, gates and fencing.<br>The DCO is supported by sufficient information to demonstrate how security will be dealt with. |
| **4.16.7** | The applicant should only include sufficient information in the application as is necessary to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application. | |
| **4.16.8** | If NPSA, ONR (for civil nuclear) and/or DESNZ are satisfied that security issues have been adequately | |

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| | addressed in the project when the application is submitted to the Secretary of State, it will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination. | |
| **Chapter 5: Generic Impacts** | | |
| ***5.2 Air Quality and Emissions*** | | |
| **5.2.8** | Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES. | **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.3.2.8 Part 3 Kent Chapter 8 Air Quality** present the assessment of the likely significant air quality effects that could result from the Proposed Project during construction, operation and decommissioning. The assessment considers temporary air quality impacts due to construction vehicle, dust and Non-Road Mobile Machinery (NRMM) emissions during the construction and decommissioning phases of the Proposed Project. It also considers the operational phase, which may affect air quality due to vehicle emissions and emissions from the substation and converter stations back-up generators. Mitigation measures have been proposed where required and are summarised in section 8.8 of the ES chapters. Taking into account embedded mitigation measures, the effects of the Proposed Project on air quality are assessed as negligible and not significant.<br>During the operational phase, the Proposed Project will be staffed by a limited number of operatives. The number of trips likely to be generated would be well below the IAQM and EPUK Development Control screening criteria. Air quality effects associated with operational phase vehicle emissions are therefore considered negligible (not significant).<br>Proposed back-up generators (at Substations and Converter Stations) will require diesel fuel. They would be rarely used and have less than a 1% chance of operating per year. In Suffolk, |
| **5.2.9** | The ES should describe:<br>• existing air quality concentrations and the relative change in air quality from existing levels;<br>• any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;<br>• the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and<br>• any potential eutrophication impacts. | |

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| | | there are no human or ecological receptors within 200 m of the Saxmundham Converter Station or Friston Substation. In Kent, Sandwich Bay to Hacklinge Marshes SSSI is approximately 20 m from the Minster Converter Station and Substation LoD. There are no human receptors within 200 m of the LoD. Based on a worst-case assumption that the back-up generators will run for 1% of the time, the emission levels will still remain below the Critical Level for the protection of vegetation and ecosystems at nature conservation sites. Additionally, mitigation measures included in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** (AQ10) will be implemented to reduce the effect of back-up generators on ecological receptors. As such, the effect of back-up generator emissions associated with the operational phase is predicted to be negligible (not significant).<br>No eutrophication effects are anticipated as the Proposed Project does not result in the increase in new residential accommodation or intensified agricultural use. |
| **5.2.12** | Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a noncompliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached. | The Proposed Project would not lead to a breach of any relevant statutory air quality thresholds or affect the ability of a non-compliant area to achieve compliance. |
| **5.2.13** | The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to | **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.3.2.8 Part 3 Kent Chapter 8 Air Quality** conclude that there are no anticipated significant effects on air quality as a result of the Proposed Project. Mitigation measures have been proposed where required and are summarised in section 8.8 of the above ES chapters. **Application** |

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| | the Air Quality Strategy and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance. | **Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent** have been secured as part of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** and measures have been incorporated into the **Outline COCP (Application Document 7.5.3.1)** and the **REAC (Application Document 7.5.3.2)** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| **5.2.16** | The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets. | **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.3.2.8 Part 3 Kent Chapter 8 Air Quality** conclude that there are no anticipated significant effects on air quality as a result of the Proposed Project. These conclusions assume design mitigation and management measures proposed, set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP** as well as the **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent** are implemented.<br><br>For the Kent Onshore Scheme, diesel-fueled backup generators are proposed at the Minster Converter Station and Substation. Additional measures including adhering to emissions standards and careful placement to manage the impacts of these emissions from these generators at sensitive receptors, in the unlikely event that they are needed, during operation, are proposed and included in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC and Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent** These measures would ensure emissions from the back-up generators do not have significant adverse effects on ecological receptors, in particular the Sandwich Bay to Hacklinge Marshes SSSI which is located |
| **5.2.17** | The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat. | |
| **5.2.18** | Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent. | |

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| | | approximately 20 m from the Minster Converter Station and Substation. |
| *5.3 Greenhouse Gas Emissions* | | |
| **5.3.4** | All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include:<br>• A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.<br>• An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.<br>• Measurement of embodied GHG impact from the construction stage.<br>• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.<br>• How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology.<br>• Calculation of operational energy consumption and associated carbon emissions.<br>• Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.<br>• Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other | Embedded Mitigation measures have been integral in reducing, and where possible avoiding, the climate change effects of the Proposed Project. Measures that have been incorporated are:<br>• Sensitive routeing and siting of infrastructure and temporary works, to avoid or reduce climate change effects;<br>• The flood mitigation measures detailed 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**;<br>• Commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC**;<br>• The use of materials with a low embodied carbon, including low-carbon concrete and steel;<br>• The use of $SF_6$-free switchgear; and<br>• The use of low carbon construction techniques, including low-carbon plant, vehicles and equipment;<br>• Designing the Proposed Project to be resilient to any significant effects of climate change.<br>**Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** includes a Lifecycle GHG impact assessment over the lifetime of the Proposed Project. The Lifecycle GHG Assessment has considered all GHG emissions from within the Order Limits arising during all stages of the construction, operation and decommissioning, as well as emissions from off-site activities. The Proposed Project will result |

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| | developments at a regional or national level, or sector level, if sectoral targets are developed. | in increased GHG emissions during construction and operation, which are estimated to contribute less than 0.01% of any respective UK carbon budget. The effect of the Proposed Project on the global climate is deemed to be minor adverse and not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Proposed Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels.<br>A **Greenhouse Gas Management Plan** (**Application Document 7.5.13)** as secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft DCO** has been prepared and sets out how GHG emissions are to be managed across the lifecycle of the Proposed Project. This plan includes the identification of opportunities for reducing GHG emissions, GHG reduction targets and allocation of responsibilities for associated actions. |
| **5.3.8** | The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development. | |
| **5.3.9** | The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development. | |
| **5.3.10** | Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions. | |
| ***5.4 Biodiversity and Geological Conservation*** | | |
| **5.4.4** | The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including | To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 HRA** has been prepared. The HRA concludes that the Proposed Project will not result in any adverse effects on the site Integrity (AeoSI) of |

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| | Special Areas of Conservation and Special Protection Areas. | the Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar. |
| **5.4.7** | 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. Most National Nature Reserves are notified as SSSIs. | The Leiston-Aldeburgh SSSI lies within the Order limits of the Suffolk Onshore Scheme. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** considers the impact of the Suffolk onshore Scheme on this SSSI. The SSSI would be traversed using trenchless methods such as Horizontal Direct Drilling. The trenchless bore would be approximately 8 m below the SSSI at the boundary and would get deeper from there, so there is minimal risk to surface habitats and hydrology. Since the potential for habitat loss is so low, this is considered a negligible impact on receptors of national importance and thus not significant. No impact pathways linking to other designated sites, including Snape Warren SSSI, are identified. |
| **5.4.8** | Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. | There is a single SSSI within 5 km of the proposed Kent Onshore Scheme (Sandwich Bay to Hacklinge Marshes SSSI), which is also shown on **Application Document 6.4.3.3.1 Designated Sites**. **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** considers the impact of the Kent Onshore Scheme on this SSSI. During construction and operation, there would be some tree height reduction within a 100 m stretch of Management Unit 11 of the SSSI, to ensure no interference with the new section of overhead line. However, this would not result in any net loss of woodland habitat. Moreover, this section of woodland is extremely dense and overgrown and would ecologically benefit from the height reduction. Since there would be no habitat loss, this is considered a negligible impact (not significant) on a receptor of national importance |
| **5.4.9** | Marine Conservation Zones (MCZs) (Marine Protected Areas in Scotland), introduced under the Marine and Coastal Access Act 2009, are areas that have been | **Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from |

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| | designated for the purpose of conserving marine flora or fauna, marine habitats or types of marine habitat or features of geological or geomorphological interest. The protected feature or features and the conservation objectives for the MCZ are stated in the designation order for the MCZ. If a proposal is likely to have significant impacts on an MCZ, an MCZ Assessment should be undertaken as per the requirements under section 126 of the Marine and Coastal Access Act 2009. Government has recently designated the first three Highly Protected Marine Areas in England. These are designated as MCZs but with a higher conservation objective and with a single feature of the whole ecosystem within the site boundaries. | the planned activities for the Proposed Project and the MCZ sites that could be affected.<br><br>The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| **5.4.11** | It is important that relevant guidance on managing environmental impacts of infrastructure in marine protected areas is followed, and that equal consideration of the effect of proposals should be given to all MPAs regardless of the legislation they were designated under. This is because all sites contribute to the network of MPAs and therefore to overall network integrity. In England, government have established a MPA condition target under the Environment Act. | **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 5 Marine Mammals and Application Document 6.2.4.5 Part 4 Marine Chapter 6 Ornithology** assesses impacts to biodiversity from the Offshore Scheme as well as **Application Document 6.6 Report to Inform HRA** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas. The mitigation hierarchy for impacts to marine biodiversity has been applied when identifying a marine |

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| | | cable corridor for the Offshore Scheme to avoid key sensitive habitats and Marine Protected Areas.<br><br>The HRA concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC.<br><br>**Application Document 6.11 Marine Conservation Zone Assessment** concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of Proposed Project related activities. |
| **5.4.12** | Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. | **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for habitats, ornithology and riparian mammals and during the operation phase for habitats, ornithology, dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project).<br><br>**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant |
| **5.4.13** | National planning policy expects plans to identify and map Local Wildlife Sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. | |
| **5.4.14** | Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to | |

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| | restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. | ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of this part of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the Minster Converter Station and Substation. |
| **5.4.15** | Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen. | An **Arboricultural Impact Assessment (AIA) (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO**, has been undertaken which considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits.<br><br>In line with paragraph 5.4.14 of NPS EN-1, the Proposed Project avoids the loss or deterioration of irreplaceable habitats through suitable mitigation.<br><br>The Proposed Project avoids and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.** |

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| **5.4.16** | Many individual species receive statutory protection under a range of legislative provisions. Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action. | The Proposed Project and/ or mitigates all long-term significant adverse effects on important ecological features such as protected species and habitats, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.** |
| **5.4.17** | Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. | **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for habitats, ornithology and riparian mammals and during the operation phase for habitats, ornithology, dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project).<br><br>**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of this part of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, |
| **5.4.19** | The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. | |

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| | | reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the Minster Converter Station and Substation.<br><br>To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 HRA** has been prepared. The HRA concludes that the Proposed Project will not result in any AeoSI of the Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar.<br><br>**Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology** set out the likely significant geology and hydrogeology effects that could result from the Proposed Project. Both documents of the ES conclude that no designated geological sites lie within the Study Area and therefore geological preservation and enhancement interests are adhered to.<br><br>This demonstrates that the Proposed Project has been designed to conserve and enhance biodiversity and geological conservation interests. |
| **5.4.21** | As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project. | As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report,** the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. In order to achieve minimum 10% net gain, an additional 257.47 units would be required for Area Units. For the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and for watercourse units. In order to achieve minimum 10% net gain, an additional 47.58 units would be required for hedgerows, 6.67 units for areas and 6.96 units for watercourses. |

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| | | Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies**.** It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies |
| **5.4.22** | The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development. | This is covered in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity, Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity, 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, Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology**. The Chapters conclude that with mitigation in place, there would be no significant adverse effects to migratory species. |
| **5.4.25** | The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree ‘Evidence Plans’ with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be | To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 HRA** has been prepared. The HRA concludes that the Proposed Project will not result in any AeoSI of the Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar. Mitigation measures that are proposed to minimise |

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| | efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects. | or avoid likely significant effects are set out and incorporated through the assessment. |
| **5.4.32** | Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases. | An **AIA (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO,** has been undertaken which considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits. Whilst some impacts to the root protection areas of veteran and ancienttrees will be required, with mitigation in place set out in **Application Document 7.5.3 Outline Onshore CEMP,** the Proposed Project and/ or mitigates all long-term significant adverse effects on veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.** The Proposed Project therefore avoids the loss or deterioration of irreplaceable habitats through suitable mitigation |
| **5.4.35** | Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:<br>• during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works | The Proposed Project and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures, including mitigations required as a result |

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| | • the timing of construction has been planned to avoid or limit disturbance<br>• during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements<br>• habitats will, where practicable, be restored after construction works have finished<br>• opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised.<br>• mitigations required as a result of legal protection of habitats or species will be complied with. | of legal protection of habitats or species, that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>A number of seasonal restrictions will be in place during the construction period to minimise impacts. **These are set out in full in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity.**<br><br>Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP**, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan- Suffolk** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>Ecological and landscape enhancement for the Proposed Project are summarised in section 5.3 of the Planning Statement and detailed in **Application Document 7.5.7.1 oLEMP – Suffolk**, **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**, and secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO**. |

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| | | As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report,** the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. In order to achieve minimum 10% net gain, an additional 257.47 units would be required for Area Units. For the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and for watercourse units. In order to achieve minimum 10% net gain, an additional 47.58 units would be required for hedgerows, 6.67 units for areas and 6.96 units for watercourses.<br><br>Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies |
| **5.4.36** | Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages. | The biodiversity management strategy for the Proposed Project is detailed cross **Application Document 7.5.7.1 oLEMP – Suffolk**, **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**, as secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO**. |
| **5.4.37** | In the design of any direct cooling system the locations of the intake and outfall should be sited to avoid or minimise adverse impacts on the receiving waters, including their ecology. There should also be specific measures to minimise impact to fish and aquatic biota by entrainment | **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish, Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology** and **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** presents information about the environmental assessment of the likely significant |

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| | and impingement or by excessive heat or biocidal chemicals from discharges to receiving waters. | marine ecology effects that could result from the Proposed Project. With mitigation in place, no significant adverse effects are anticipated. |
| **5.4.38** | To further minimise any adverse impacts on geodiversity, where appropriate applicants are encouraged to produce and implement a Geodiversity Management Strategy to preserve and enhance access to geological interest features, as part of relevant development proposals. | There are no designated geological sites within the study area in Suffolk. The Sandwich Bay to Hacklinge Marshes SSSI is the only designated geological site identified within the study area in Kent. The impacts on this receptor are assessed within **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Processes** as it is located within the marine section of the Proposed Project. The assessment set out in **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** reports a moderate (significant) effect during the operational lifetime of the Proposed Project from coastal geomorphological changes due to the effects of climate change. The future baseline described in Section 1.7 of **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** accounts for how the effects of climate change and the associated effects of sea level rise and increased storminess may alter the landfall sites. Further information is provided on how the effects of climate change are considered within the Proposed Project, see **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change.**<br><br>As concluded in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology**, with embedded mitigation measures, there are no likely significant residual effects in relation to geology and hydrogeology that could result from the Suffolk and Kent Onshore Scheme during their construction, operation and maintenance and decommissioning phases. Measures for the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**. |

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| 5.4.41 | The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated. | **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for habitats, ornithology and riparian mammals and during the operation phase for habitats, ornithology, dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project).<br><br>**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of this part of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the Minster Converter Station and Substation.<br><br>The biodiversity management strategy for the Proposed Project is detailed cross **Application Document 7.5.7.1 oLEMP – Suffolk**, **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape** |
| 5.4.42 | As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought. | |
| 5.4.43 | If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm. | |

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| | | **Mitigation**, as secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 HRA** has been prepared. The HRA concludes that the Proposed Project will not result in any adverse effects on the site Integrity (AeoSI) of the Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar. |
| **5.4.44** | The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer. | Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. Section 6.2 of A**pplication Document 7.5.7.1 Outline LEMP- Suffolk** and **Application Document 7.5.7.2 Outline LEMP- Kent** set out the management periods for landscape and ecological enhancement and reinstatement. Where possible, these will be maintained for the lifetime of the assets. |
| **5.4.45** | The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. | Based on surveys and impact assessment, no protected species licences are expected to be required for the Suffolk Onshore Scheme.<br><br>The only protected species licence expected to be required for the Kent Onshore Scheme is one for water voles. Water voles are expected to be excluded from areas of ditch that must be crossed by the haul route or cable trench using the displacement method. |

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| | | This is proposed to be addressed through Class Licence CL31[1] under supervision of a registered ecologist. As such, no specific protected species licence to Natural England is required. |
| **5.4.46** | Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. | The landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. Full details of the landscape strategy are provided in the Outline LEMPs (**Application Document 7.5.7.1 Outline LEMP – Suffolk** and **Application Document 7.5.7.2 Outline LEMP – Kent**). Detailed LEMP's are secured through Requirement 6 of Schedule 3 of the **Application Document 3.1 Draft DCO.** Further biodiversity mitigation is secured within the **Application Document 7.5.3.2 CEMP Appendix B REAC**. As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. In order to achieve minimum 10% net gain, an additional 257.47 units would be required for Area Units. For the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and  for watercourse units. In order to achieve minimum 10% net gain, an additional 47.58 units would be required for hedgerows, 6.67 units for areas and 6.96 units for watercourses.<br><br>**Application Document 6.12 Biodiversity Net Gain Feasibility Report** states that National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. |

[1] Water voles: licence to intentionally damage or destroy water vole burrows by displacement (CL31) - GOV.UK

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| **5.4.48** | In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment. | The Proposed Project and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.** |
| **5.4.49** | The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. | |
| **5.4.50** | The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest. | An assessment of impacts of the Proposed Project during construction, operation and decommissioning on designated sites including SSSIs is contained in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.** No significant adverse effects on any of these designations have been identified, taking into account mitigation.<br><br>Careful consideration has been paid in the design and timing of works close to Leiston-Aldeburgh SSSI. The impact assessment has been informed by noise modelling using criteria agreed with Natural England and timing of potentially disturbing works to take place outside the breeding bird season has been built into the programme. In order to minimise impacts on the SSSI, the decision has also been made to traverse it by Horizontal Direct Drill (HDD) rather than open cut trenching.<br><br>Careful attention has also been paid to the design and timing of works close to Sandwich Bay to Hacklinge Marshes SSSI, and collision risk for the new section of overhead line over the River Stour. The impact assessment has been informed by noise |

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| | | modelling, using criteria agreed with Natural England and timing of potentially disturbing works to take place outside the breeding bird season has been built into the programme. In order to further minimise impacts on the SSSI the decision has also been taken to traverse the most sensitive coastal sections (the saltmarsh and upper intertidal zone) by Horizontal Direct Drill rather than open cut trenching, and an assessment of the potential impacts of HDD on the SSSI through frac out has been undertaken. This is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured by Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1**) |
| **5.4.51** | The Secretary of State is bound by the duties on public authorities in relation to MCZs imposed by sections 125 and 126 of the Marine and Coastal Access Act 2009. | **Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected.<br><br>The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a |

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| | | likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| **5.4.52** | The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent. | An assessment of impacts of the Proposed Project during construction, operation and decommissioning on designated sites including regional and local designations is contained in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.** No significant adverse effects on any of these designations have been identified, taking into account mitigation. |
| **5.4.53** | The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. | An **AIA (Application Document 6.10)**, has been undertaken which considers the likely direct and indirect Arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits. Whilst some impacts to the root protection areas of veteran trees will be required, with mitigation in place set out in **Application Document 7.5.3 Outline Onshore CEMP,** the Proposed Project and/ or mitigates all long-term significant adverse effects on veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft DCO.** The final level of arboricultural impacts will be assessed and recorded as part of an Arboricultural Method Statement which will be secured via the DCO Schedule 3 Requirement 8 (**Application Document 3.1**). |
| **5.4.54** | The Secretary of State should ensure that species and habitats identified as being of importance for the | **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely |

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| | conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate. | significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for habitats, ornithology and riparian mammals and during the operation phase for habitats, ornithology, dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project). |
| **5.4.55** | The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which they consider may result from a proposed development | **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of this part of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the Minster Converter Station and Substation.<br><br>To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Application Document 6.6 HRA** has been prepared. The HRA concludes that the Proposed Project will not result in any adverse effects on the site Integrity (AeoSI) of the Sandlings SPA, Alde-Ore Estuary SPA/Ramsar site, |

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| | | Minsmere-Walberswick SPA/Ramsar, Thanet Coast to Sandwich Bay SPA/Ramsar and Stodmarsh SPA/Ramsar.<br><br>Based on the above, the Proposed Project does not result in biodiversity impacts which would merit refusal of consent. |
| ***5.5 Civil and Military Aviation and Defence Interests*** | | |
| **5.5.37** | Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3). | NATS who are the UK's leading provider of air traffic control services have been consulted on the proposals during consultation activities. They have confirmed that they operate no infrastructure within 10 km of the Order Limits and had no comments on the DCO Application. |
| **5.5.39** | The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests. | The Ministry of Defence and the Civil Aviation Authority (prescribed consultation bodies) were also consulted in relation to safeguarding of assets (at statutory consultation) and no response was received. Please refer to **Application Document 5.2 Consultation Report** for further details. |
| ***5.6 Coastal Change*** | | |
| **5.6.10** | Where relevant, applicants should undertake coastal geomorphological and sediment transfer modelling to predict and understand impacts and help identify relevant mitigating or compensatory measures. | **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** presents information about the environmental assessment of the potential significant physical processes effects that could result from the Proposed Project. |
| **5.6.11** | The ES (see Section 4.3) should include an assessment of the effects on the coast, tidal rivers and estuaries. In particular, applicants should assess:<br>• the impact of the proposed project on coastal processes and geomorphology, including by taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant | Please see response to paragraph 5.6.22 of NPS EN-1 below regarding Shoreline Management Plans.<br><br>The Proposed Project has been designed to avoid, minimise and mitigate harm to the physical environment as far possible. As concluded within **Application Document 6.2.4.2 Physical Processes,** the operation of the Proposed Project has the |

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| | must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast<br>• the implications of the proposed project on strategies for managing the coast as set out in Shoreline Management Plans (SMPs)207(which are designed to identify the most sustainable approach to managing flood and coastal erosion risks from short to long term and are long term non-statutory plans which set out the agreed high-level objective for coastal flooding and erosion management for each SMP area), any relevant Marine Plans, River Basin Management Plans, and capital programmes for maintaining flood and coastal defences and Coastal Change Management Areas<br>The effects of the proposed project on marine ecology, biodiversity, protected sites and heritage assets<br>• how coastal change could affect flood risk management infrastructure, drainage and flood risk<br>• the effects of the proposed project on maintaining coastal recreation sites and features<br>• the vulnerability of the proposed development to coastal change, taking account of climate change, during the project's operational life and any decommissioning period | potential to result in the following significant effects to the physical environment:<br>• The impact on coastal morphology resulting from the installation of rock protection at the HDD exit pit at the Suffolk landfalls potentially increasing erosion at a presently eroding coastline.<br>• Important morphological features such as the Coralline Crag Ridges that play an important role in stabilizing the Suffolk coast becoming increasingly at risk from climate change driven sea level rise and increased storminess which may as a result increase its sensitivity resulting in a potential significant effect.<br>Likely residual effects include the future impact of climate change associated sea level rise and increased storminess which may alter the baseline conditions associated with specifically the coastal environment. It is noted that important morphological features such as the Coralline Crag Ridges that plays an important role in stabilizing the Suffolk coast is likely to become increasingly at risk from climate change driven sea level rise and increased storminess which may as a result increase its sensitivity.<br>**Application Document 6.8 Flood Risk Assessment** (FRA) assesses flood risk from rivers and the sea, surface water and groundwater sources to and from the Proposed Project. During operation, flood risk from rivers and the sea, surface water and groundwater sources is assessed to be low due to locating key infrastructure (the converter stations and substations) in Flood Zone 1 and implementing permanent surface water drainage solutions, based on suitable forms of Sustainable Drainage and embedding climate change resilience into the Proposed Project's design. The residual risk (associated with the pylons in Kent) is |
| **5.6.13** | The applicant should be particularly careful to identify any effects of physical changes on the integrity and special features of Marine Protected Areas (MPAs). These could include MCZs, habitat sites including Special Areas of Conservation and Special Protection Areas with marine features, Ramsar Sites, Sites of Community Importance, and SSSIs with marine features. Applicants should also | |

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| | identify any effects on the special character of Heritage Coasts. | assessed as low given the nature of the structures (open lattice and raised cables) meaning that they are resilient to flooding and floodwater could pass through the structures unimpeded. **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP** sets out the good practice measures, including SuDS, that are proposed for managing surface water flood risk. |
| **5.6.14** | Applicants must demonstrate that full account has been taken of the policy on assessment and mitigation in paragraphs 4.3.1 to 4.3.9 of this NPS, taking account of the potential effects of climate change on these risks. | Likely significant effects on infrastructure and other marine users, including marine tourism and recreation, have been considered in **Application Document 6.2.4.10 Other Sea Users**. The assessment in **Application Document 6.2.4.9 Other Sea Users** found that no significant effects are expected to impact other sea users as a result of the Proposed Project's embedded mitigation and control and management measures. |
| **5.6.16** | The Secretary of State should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period. Proposals that aim to facilitate the relocation of existing energy infrastructure from unsustainable locations which are at risk from coastal change, should be supported where it would result in climate resilient infrastructure. | **Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected. It was concluded the Proposed Project does not result in any MCZ residual impacts.<br><br>Mitigation measures have been incorporated into the project design to reduce the physical processes effects of the Proposed Project so that they are not likely to be significant. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline COCP.** |
| **5.6.17** | The Secretary of State should not normally consent new development in areas of dynamic shorelines where the proposal could inhibit sediment flow or have an adverse impact on coastal processes at other locations. Impacts on coastal processes must be managed to minimise adverse impacts on other parts of the coast. Where such proposals are brought forward, consent should only be granted where the Secretary of State is satisfied that the benefits (including need) of the development outweigh the adverse impacts. | The assessment set out in **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** reports a moderate (significant) effect during the operational lifetime of the Proposed Project from coastal geomorphological changes due to the effects of climate change. It is considered this harm would be outweighed |

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| | | by the benefits of the Proposed Project as set out in section 5.3 of **Application Document 7.1 Planning Statement**. |
| **5.6.22** | The Secretary of State should also have regard to any relevant Shoreline Management Plans. | The Suffolk landfall location lies within the coastline covered by the Lowestoft to Felixstowe shoreline management plan (SMP) 7 which is split into 7 areas. The landfall location is situated within the Thorpeness to Orford Ness 5 area, which is further split it into management units. The landfall location aligns with management unit ALB14.2.<br><br>The Kent Offshore Scheme makes landfall in Pegwell Bay, part of the Isle of Grain to South Foreland SMP (10). The landfall site is located within Policy Unit 4b 20: Ramsgate Harbour (West) to North of the River Stour.<br><br>Section 1.7 of **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Processes** assesses coastal processes at a regional scale and local scale in association with both landfall sites using sediment transport studies, recent erosion studies, beach and seabed profile and elevation data and the information provided in shoreline management plans. This analysis is used to establish the potential of the Proposed Project to coastal and nearshore morphological change and coastal processes (Section 1.9).<br><br>**Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** presents the assessment of the likely significant effects of the Proposed Project on the climate and the proposed climate change effects that are likely to affect the Proposed Project and surrounding environment. The assessment includes a climate change resilience assessment (CCRA) and a lifecycle Greenhouse Gas (GHG) impact assessment. |

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| **5.6.21** | In addition to this NPS, the Secretary of State must have regard to the appropriate marine policy documents in taking any decision which relates to the exercise of any function capable of affecting any part of the UK marine area. | Appendix B of the **Planning Statement** reviews the Proposed Project against the South East Inshore Marine Plan and the East Inshore and Offshore Marine Plan. This assessment has not identified any conflict with relevant marine policies. |
| **5.6.23** | Substantial weight should be attached to the risks of flooding and coastal erosion and the Secretary of State should be satisfied that the applicant has taken full account of the policy on assessment and mitigation in paragraphs 4.3.1 to 4.3.9 of this NPS, taking account of the potential effects of climate change on these risks. | A Climate assessment has been undertaken for the Proposed Project and presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**.<br>**Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** presents information about the environmental assessment of the potential significant physical processes effects that could result from the Proposed Project.<br>The Proposed Project has been designed to avoid, minimise and mitigate harm to the physical environment as far possible. As concluded within **Application Document 6.2.4.2 Physical Processes,** the operation of the Proposed Project has the potential to result in the following significant effects to the physical environment:<br>• The impact on costal morphology resulting from the installation of rock protection at the HDD exit pit at the Suffolk landfalls potentially increasing erosion at a presently eroding coastline.<br>• Important morphological features such as the Coralline Crag Ridges that play an important role in stabilizing the Suffolk coast becoming increasingly at risk from climate change driven sea level rise and increased storminess which may as a result increase its sensitivity resulting in a potential significant effect.<br>Likely residual effects include the future impact of climate change associated sea level rise and increased storminess which may alter the baseline conditions associated with specifically the |

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| | | coastal environment. It is noted that important morphological features such as the Coralline Crag Ridges that plays an important role in stabilizing the Suffolk coast is likely to become increasingly at risk from climate change driven sea level rise and increased storminess which may as a result increase its sensitivity.<br><br>A proportionate **FRA (Application Document 6.8)** has been prepared by a competent person to support the DCO Application**.** The FRA assesses sources of flooding from rivers and the sea, surface water and groundwater; flooding from sewers/water mains and reservoirs were scoped out of the assessment and take into consideration the effects of Climate Change. |
| ***5.7 Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation*** | | |
| **5.7.1** | During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order. | The Onshore Scheme has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and this includes the provision of a construction dust management plan. Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP**. Both **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP** and **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority.<br><br>Outline air quality management plans have been compiled and presented in **Application Document 7.5.6.1 Outline Air Quality** |

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| | | **Management Plan – Suffolk** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority. Both management plans set out measures to control and management air quality impacts during construction. As set out in the outline air quality management plans, construction vehicles will conform to relevant applicable standards and will be correctly maintained and operated in accordance with the manufacture's recommendations, so as to help reduce vehicle emissions. |
| **5.7.4** | Some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable. | An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**. The assessment confirms that with the implementation of good practice control measures, effects on local amenity and ecological receptors would be minimised and would therefore be kept to acceptable levels. Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP.** The detailed CEMP would come forward post consent as secured by Requirement 6 in Schedule 3 of the **draft DCO (Application Document 3.1)**. |
| **5.7.5** | The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES. | An assessment of air quality effects has been undertaken to determine where the Proposed Project is likely to have adverse impacts on air quality and is presented in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.3.2.8 Part 3 Kent Chapter 8 Air Quality.** The |
| **5.7.12** | The Secretary of State should satisfy itself that: | |

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| | • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out<br>• that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts. | assessment considered temporary air quality impacts due to construction vehicle, dust and Non-Road Mobile Machinery emissions during the construction and decommissioning phases of the Proposed Project. It also considers the operational phase, which may affect air quality due to vehicle emissions and emissions from the substation and converter stations back-up generators. Mitigation measures have been proposed where required and are summarised in section 8.8 of each ES chapter. Taking into account embedded mitigation measures, the effects of the Proposed Project on air quality are assessed as negligible and not significant. No significant effects in respect to odour, dust, steam, smoke and artificial light are expected during the operational phase of the Proposed Project.<br>The proposed lighting requirements for the Suffolk Onshore Scheme and the Kent Onshore Scheme are described in **Application Document 6.2.14 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Potential effects associated with the proposed lighting on landscape character and visual amenity are summarised in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**.<br>During construction, the project would comply with the good practice measures outlined within **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority. Construction lighting will be of the lowest levels necessary to perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and habitats. In addition, a **Statement of Statutory Nuisance (Application Document 6.7)** has been submitted with the DCO Application. |
| **5.7.15** | In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke, and artificial light from the development. The Secretary of State should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage. | |

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| *5.8 Flood Risk* | | |
| **5.8.13** | A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving:<br>• sites of 1 hectare or more<br>• land which has been identified by the EA or NRW as having critical drainage problems<br>• land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future<br>• land that may be subject to other sources of flooding (for example surface water)<br>• where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems. | A proportionate **FRA (Application Document 6.8)** has been prepared to support the DCO Application**.** The FRA assesses sources of flooding from rivers and the sea, surface water and groundwater; flooding from sewers/water mains and reservoirs were scoped out of the assessment. It documents the assessment undertaken to understand whether the Proposed Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere in accordance with the requirements set out in paragraph 5.8.14.<br>The preparation of the FRA has considered advice and taken account of consultation with key bodies, including the Environment Agency, the Lead Local Flooding Authorities (Kent County Council and Suffolk County Council), Stour (Kent) Internal Drainage Board and East Suffolk Water Management Board.<br>The Environment Agency Flood Map for Planning (Rivers and Sea) shows that the majority of the Order Limits is within Flood Zone 1. However, due to the linear nature of the development, there are necessarily localised areas of the Suffolk Onshore Scheme and the Kent Onshore Scheme within Flood Zone 3, including some watercourse crossings and the landfall site in Suffolk and the overhead line section and landfall in Kent.<br>National Grid has made a number of commitments around flood risk management measures. These include embedded measures, which are listed within **Application Document 7.5.3.2 CEMP Appendix B REAC** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority. They also include good practice measures which are documented in the **Outline CoCP (application document 7.5.3.1).** With these measures in place, the residual risk during the construction phase has been assessed as low risk. Due to the siting of vulnerable operational |
| **5.8.14** | This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. | |
| **5.8.15** | The minimum requirements for Flood Risk Assessments (FRA) are that they should:<br>• be proportionate to the risk and appropriate to the scale, nature and location of the project;<br>• consider the risk of flooding arising from the project in addition to the risk of flooding to the project; | |

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| | • take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made<br>• be undertaken by competent people, as early as possible in the process of preparing the proposal;<br>• consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance;<br>• consider the vulnerability of those using the site, including arrangements for safe access and escape;<br>• consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration;<br>• identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management;<br>• consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;<br>• Include the assessment of the remaining (known as 'residual') risk after risk reduction measures have | infrastructure to avoid flood zones and areas at risk, the residual risk during operation is also assessed as low.<br>A separate hydraulic modelling assessment has been undertaken for the River Fromus crossing (this would be the only watercourse crossing remaining during operation of the Suffolk Onshore Scheme). Based on the modelling, the proposed permanent bridge over the River Fromus is considered to be at a very low risk of fluvial flooding during construction and there would be no flood risk detriment to third party land.<br>As part of the Kent Onshore Scheme, new pylons and overhead lines would remain during operation and would be located partially within Flood Zone 3. However, the nature of the structures (open lattice and raised cables) means that they are resilient to flooding and floodwater can pass through the structures unimpeded. Therefore, this part of the Proposed Project is of low vulnerability to fluvial flooding during operation.<br>In conclusion, this FRA demonstrates that the requirements set out in para 5.8.13 and 5.8.15 of NPS EN-1, and the flood risk management measures identified would be secured through the CEMP (**application document 7.5.3.2 CEMP Appendix B REAC**) and Requirement 6 of Schedule 3 of the **Application Document 3.1 draft DCO.** |

been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding;

- consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include:

  i. Describe the existing surface water drainage arrangements for the site

  ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates

  iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate

  iv. Demonstrate how the hierarchy of drainage options has been followed.

  v. Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate.

  vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site

vii. Describe the multifunctional benefits the sustainable drainage system will provide

viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system

ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere

x. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development

- detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere;
- identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and
- be supported by appropriate data and information, including historical information on previous events

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| **5.8.24** | To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property. | **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP** sets out the good practice measures, including SuDS, that are proposed for managing surface water flood risk. As per good practice measure W11 of **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**, where new permanent impermeable areas are created, drainage would be designed in accordance with the requirements of policy and |
| **5.8.25** | In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: | |

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| | • source control measures including rainwater recycling and drainage<br>• infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities<br>• filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns<br>• filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed<br>• basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding | guidance requirements of the relevant Lead Local Flood Authorities and will include allowances for climate change in accordance with current (May 2022) Environment Agency requirements.<br>No planning obligations are considered necessary. |
| **5.8.26** | Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. | |
| **5.8.27** | The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect. | |
| **5.8.28** | It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is | |

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| | appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation. | |
| **5.8.29** | The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. | **Application Document 6.8 FRA** and supporting assessments and hydraulic modelling confirm that the Proposed Project, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Proposed Project, taking into account climate change. The surface water drainage design demonstrates that SuDS have been designed into the Proposed Project in accordance with NPS EN-1 paragraph 5.8.36.<br><br>A sequential approach has been applied in selecting the land for the Proposed Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. |
| **5.8.30** | Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. | |
| **5.8.31** | Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site. | |
| **5.8.32** | Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits. | |
| **5.8.33** | The receipt of and response to warnings of floods is an essential element in the management of the residual risk | **Application Document 7.5.3.1 CEMP Appendix A Outline COCP**, with contractor(s) subscribing to the Environment Agency's |

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| | of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding. | Floodline service, Met Office's Weather Warnings email alerts system and any other relevant flood warning information. The contractor(s) will implement a suitable flood risk action plan, which will include appropriate evacuation procedures should a flood occur or be forecast. |
| **5.8.34** | The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA. | |
| **5.8.35** | Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood. | Details of the flood resilience built into the design of the Proposed Project and the measures to mitigate the potential for the Proposed Project to cause increases in flood risk elsewhere are provided in Section 4 of **FRA (Application Document 6.8)**. |
| **5.8.36** | In determining an application for development consent, the Secretary of State should be satisfied that where relevant:<br>• the application is supported by an appropriate FRA<br>• the Sequential Test has been applied and satisfied as part of site selection<br>• a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk<br>• the proposal is in line with any relevant national and local flood risk management strategy<br>• SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate<br>• in flood risk areas the project is designed and constructed to remain safe and operational during its | The FRA (Application Document 6.8) has been undertaken in line with the relevant guidance and planning policy requirements as summarised above. It demonstrates that the requirements of this policy have been met, and the flood risk management measures identified would be secured through the CEMP (A**pplication Document 7.5.3.2 CEMP Appendix B REAC**) and Requirement 6 of Schedule 3 of A**pplication Document 3.1 draft DCO**.<br>Flood risk and land drainage effects during operation have been avoided through design. A sequential approach has been applied in selecting the land for the Proposed Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. The Proposed Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. In flood zones 1 and 2 the exception tests is therefore not required. However, in flood zone 3 it is required.<br>The Saxmundham and Minster Converter Stations and the Friston and Minster Substations, which are the elements of the Proposed Project most vulnerable to flooding, lie in Flood Zone 1 and have |

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| | lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42)<br>• the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development | been sited to avoid areas at high risk of surface water and groundwater flooding. Due to its linear nature some components (associated with construction access routes (e.g. proposed temporary bridge over the River Stour in Kent) and where the marine cables make landfall) of the Proposed Project must necessarily be in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3), however, these components are of low vulnerability to flooding.<br><br>As detailed in good practice measure W06 in the Outline CoCP (**Application Document 7.5.3.1 CEMP Appendix A Outline COCP**), National Grid would seek to avoid storage of construction materials within Flood Zone 3 and areas of high and medium risk of flooding from surface water and temporary access routes within Flood Zone 3 will be suitably designed for flood resilience in accordance with any conditions of a Flood Risk Activity Permit and removed at the end of the construction phase, with the land re-instated.<br><br>As a result of parts of the Proposed Project being located within Flood Zone 3, it is necessary to apply the Exception Test in accordance with NPS EN-1, the NPPF and PPG. The Exception Test in paragraph 5.8.11 of NPS EN-1 requires it to be demonstrated that:<br><br>a. *"The development would provide wider sustainability benefits to the community that outweigh the flood risk; and*<br><br>*b.the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall"*.<br><br>The need for the Proposed Project is explained in **Application Document 7.2 Strategic Options Backcheck Report** and summarised in Section 5 of the Planning Statement. Section 5 of the Planning Statement also explains the landscape and |

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| | | ecological enhancements of the Proposed Project's design set out in **Application Document 7.5.7.1 Outline LEMP- Suffolk** and **Application Document 7.5.7.2 Outline LEMP- Kent**; and benefits of the Scheme from employment generation and GVA contribution during construction and safeguarding land within the design for future improvements to PRoW.<br><br>In response to meeting part (b) of the Exception Test, this is addressed through the site-specific **FRA (Application Document 6.8)**, which demonstrates that with mitigation the Proposed Project will be safe from flooding throughout its lifetime without increasing flood risk elsewhere, taking into account climate change impacts required by paragraph 5.8.12 of NPS EN-1. Therefore, the Scheme satisfies part (b) of the Exception Test. As the Proposed Project satisfies both elements of the Exception Test, development of essential utility infrastructure within Flood Zone 3 can proceed in accordance with the policy framework.<br><br>The Proposed Project is committed to incorporating Sustainable Drainage Systems (SuDS) to management construction and operational drainage. Further details are set out in the **Outline CoCP (Application Document 7.5.3.1)** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| ***5.9 Historic Environment*** | | |
| **5.9.9** | The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include | **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** report the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. This is supported by desk based assessments set out in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** and **Application Document** |

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| | reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project. | **6.3.3.3.A Appendix 3.3.A Cultural Heritage Baseline Report** which describe the significance of the assets.<br>National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent Onshore oWSI (Draft) and Application Document 7.5.4.1 Suffolk Onshore oWSI (Draft)** and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.<br>**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** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated and designated heritage assets during operation.<br>The Heritage Statement concludes that the Suffolk and Kent Onshore Schemes would result in less than substantial harm to 8 non-designated heritage assets of negligible value.<br>The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm to 2 designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm to 1 non-designated heritage asset of schedulable quality due to impacts on setting.<br>**Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental |
| **5.9.10** | As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact. | |

assessment of the likely significant marine archaeological effects that could result from the Proposed Project. This chapter is supported by **Application Document 6.3.4.6.A Part 4 Marine Appendix 4.6.A Marine Archaeological Technical Report,** which outlines known and potential marine heritage assets within the study area (comprising a 100 m buffer around the extent of the Offshore Scheme's Order Limits) and assesses the significance and sensitivity of known and potential marine heritage assets.

The assessment presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** concludes that, with the implementation of mitigation measures (summarised in sections 6.7 and 6.10 of the chapter), the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial (not significant).

Details regarding conservation are presented in section 1.11 of the Outline WSI (**Application Document 7.5.5 Outline Offshore WSI**).

The cumulative impacts resulting from the Proposed Project are assessed in the following documents:

- **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project;**
- **Application Document Number 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects;**
- **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects;**
- **Application Document Number 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects; and**

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| | | • **Application Document Number 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.**<br><br>No significant residual effects are expected to the wider historic environment. |
| **5.9.11** | Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact. | Desk based assessments are set out in **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** which describe the significance of the assets**.** Section 3.2 of this document sets out the information that has informed the desk based assessment. **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** provides all of this information to allow the SoS to make his judgement |
| **5.9.22** | In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset (including assets whose setting may be affected by the proposed development), taking account of:<br>• relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application<br>• any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales.<br>• historic landscape character records<br>• the relevant Historic Environment Record(s), and similar sources of information | |

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| | • representations made by interested parties during the examination process<br>• expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it. | |
| **5.9.27** | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. | Where feasible, the Proposed Project has been designed to avoid impacts to heritage assets. This has been informed by the geophysical survey and the evaluation trenching, as well as other surveys such as the walkover survey.<br><br>Where impacts cannot be avoided, they have been assessed in Section 3.9 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** and **Application Document 6.2.3.3 Part 2 Kent Chapter 3 Cultural Heritage**, while additional mitigation is provided in Section 3.10 of these chapters.<br><br>Provisional information regarding mitigation proposed is also provided in **Application Document 7.5.4.2 Kent Onshore oWSI (Draft)** and **Application Document 7.5.4.1 Suffolk Onshore oWSI (Draft).** |
| **5.9.28** | The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. | An assessment of impact to the heritage significance of assets is included in Section 3.9 of **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**. A Heritage Statement which confirms there would be no substantial harm to any designated heritage assets assessed is presented in Appendix E of the **Planning Statement**. |
| **5.9.29** | Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks | The Heritage Statement at Appendix E of the **Planning Statement** concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm to two designated heritage |

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| | and Gardens; and World Heritage Sites, should be wholly exceptional. | assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm to one non-designated heritage asset of schedulable quality. However, this is not considered to result in a loss of significance to these assets and therefore the Proposed Project would be in compliance with this test. There are no designated or non-designated heritage assets located within the Offshore Scheme. |
| **5.9.32** | Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use. | The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm to two designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm to one non-designated heritage asset of schedulable quality.<br><br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of the Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| **5.9.33** | In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. | **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** identifies that, with mitigation in place, there would be no significant residual adverse effects to non-designated heritage assets. The Heritage Statement concludes that the Onshore Scheme would result in less than substantial harm to 8 non-designated heritage assets of negligible value. The less than substantial harm upon non designated heritage assets is clearly outweighed by the substantial public benefits and need for the Proposed Project therefore confirming the judgement required under paragraph 5.9.33. |

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| *5.10 Landscape and Visual* | | |
| **5.10.16** | The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues. | The landscape and visual impacts of the Proposed Project, taking into consideration landscape guides, are assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**, which are accompanied by:<br><br>For the Suffolk Onshore Scheme: **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.**<br><br>For the Kent Onshore Scheme: **Application Document 6.3.3.1.C Appendix 3.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.3.1.D Visual Amenity Baseline and Assessment.**<br><br>Published landscape and seascape character documents have been used as a means of assessing landscape effects, as described in Section 2.7 Baseline Conditions of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual.** Relevant policies in local development documents that were taken into account in the assessment are set out in Section 2.2 Regulatory and Planning Context of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual.** |
| **5.10.17** | The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales. | |
| **5.10.18** | For seascapes, applicants should consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments, and any successors to them. | **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** present the assessment of the likely significant landscape and visual effects that could result from the Proposed Project; including seascapes, |

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| | | No significant adverse effects at year 15 of operation are expected across seascapes. |
| **5.10.19** | The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery, and operation of the scheme. | Embedded measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Proposed Project. Landscape and visual matters were considered in the early stages of siting and design. **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project. It explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings. |
| **5.10.20** | The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONBs the assessment should include effects on the natural beauty and special qualities of these areas | Impacts to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty are considered in Section 7.3 of **the Planning Statement.**<br><br>**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme. The assessment concludes that there would not be any significant adverse effects on designated landscapes, including the Suffolk Heaths and Coast AONB, arising from the Suffolk Onshore Scheme.<br><br>As set out in Section 1.7 of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, in line with national |

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| | | policy requirements, the Proposed Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to site the converter station away from the AONB to limit effects on its setting. This results in predominantly temporary direct effects in localised areas of the AONB associated with the HVDC cable laying (such as minor vegetation removal and temporary displacement of agricultural land and acid grassland). Following construction, the temporary works associated with the landfall and HVDC corridor would be fully reinstated in accordance with control and management measures outlined in **Application Document 7.5.7.1 Outline LEMP – Suffolk.**<br><br>The Proposed Project will include an area of land (circa 6 ha) to the south of the A1094 within the Order Limits for delivering acid grassland enhancement to the AONB. No element of the Kent Onshore Scheme is located within an AONB or will have an impact on an AONB and therefore the appraisal of national landscape impacts for the Kent Onshore Scheme is not required. Section 7.3 of the Planning Statement sets out how the Suffolk Onshore Scheme seeks to further the statutory purposes of the AONB which is to 'conserve and enhance natural beauty'. As demonstrated in section 7.3 of the Planning Statement, this enhancement targets the Natural Beauty and some of the Special Qualities indicators of the AONB and contributes to aspirations set out in its Management Plan and will therefore further the statutory purposes of the AONB. |
| **5.10.21** | The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation. | Consideration of visual effects of light pollution during construction and operation is presented in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment** and **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment.** As explained in these documents, associated lighting at the Saxmundham Converter |

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| **5.10.22** | The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised. | Station, Friston Substation and the Minster Converter Station and Substation would be on for occasional and short periods of time during the operational phase.<br><br>**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** set out how impacts from construction and operation will be minimised. |
| **5.10.24** | Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality. | The landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. Full details of the landscape strategy are provided in the Outline LEMPs (**Application Document 7.5.7.1 Outline LEMP – Suffolk** and **Application Document 7.5.7.2 Outline LEMP – Kent**). Detailed LEMP's are secured through Requirement 6 of Schedule 3 of the **Application Document 3.1 Draft DCO.** |
| **5.10.26** | Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function. | Whilst the Proposed Project will result in some significant adverse impacts during construction and operation, the landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed landscape visual effects wherever possible. As a result, no additional mitigation measures have been identified in addition to the embedded measures. |
| **5.10.32** | When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on | The Order Limits for the Suffolk Onshore Scheme (landfall and HVDC cable) go through the Suffolk Coast and Heaths National Landscape. Paragraph 4.2.17 and 5.10.32 in NPS EN-1 confirms that the Secretary of State many grant development consent in |

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| | applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:<br>• the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;<br>• the cost of, and scope for, developing all or part of the development 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 4.3; and<br>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. | nationally designated landscapes in exceptional circumstances. This includes demonstrating that the development will be in the public interest, along with other matters listed below. The Suffolk Onshore Scheme meets the tests set out in paragraph 5.10.32, as follows:<br>• The need for the development- Section 5 of the Planning Statement and the **Application Document 7.2 Strategic Options Back Check Report (Updated Needs Case)** explains that the Proposed Project will reinforce the transmission system in the South East of England and East Anglia. In summary, in accordance with paragraphs 3.2.6 and 3.2.7 need is established for the Proposed Project and this need is urgent. In addition, the Proposed Project will provide CNP infrastructure, for which the presumption in favour of granting development consent is firmly engaged.<br>• The cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way is set out in **Application Document 8.2 Historic Report 2 (Options Selection and Design Evolution).** This explains that the connection is required in the Sizewell area. The AONB extends along the coast without interruption from Felixstowe and Harwich in the south to Kessingland in the north. As such, it is not possible to avoid the Suffolk Coast and Heaths National Landscape and meet the needs case without a significantly longer and indirect route that would not be in accordance with National Grid's statutory duties.<br>• And any detrimental effect on the environment, the landscape and recreational opportunities-: detrimental effects on the environment, landscape and recreational opportunities within the AONB have been avoided through undergrounding and careful consideration of routeing and siting through the AONB |

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| | | On the basis of the above, exceptional circumstances have been demonstrated to justify the proposed development in the Suffolk and Essex Heaths and Coast AONB in accordance with paragraphs 4.2.17 and 5.10 32 of NPS EN-1. |
| **5.10.33** | For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. The Secretary of State 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. | Impacts to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty are considered in Section 7.3 of **the Planning Statement.**<br><br>**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme. The assessment concludes that there would not be any significant adverse effects on designated landscapes, including the Suffolk Heaths and Coast AONB, arising from the Suffolk Onshore Scheme. |
| **5.10.34** | The duty to seek to further the purposes of nationally designated landscapes 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 harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent. | As set out in Section 1.7 of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, in line with national policy requirements, the Proposed Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routing and siting process. This includes the decision to site the converter station away from the AONB to limit effects on its setting. This results in predominantly temporary direct effects in localised areas of the AONB associated with the HVDC cable laying (such as minor vegetation removal and temporary displacement of agricultural land and acid grassland). Following construction, the temporary works associated with the landfall and HVDC corridor would be fully reinstated in accordance with control and management measures outlined in **Application Document 7.5.7.1 Outline LEMP – Suffolk** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>The Proposed Project will include an area of land (circa 6 ha) to the south of the A1094 within the Order Limits for delivering acid |

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| | | grassland enhancement to the AONB. As demonstrated in section 7.3 of the Planning Statement, this enhancement targets the Natural Beauty and some of the Special Qualities indicators of the AONB and contributes to aspirations set out in its Management Plan, and will therefore further the statutory purposes of the AONB. The provision of the Acid Grassland is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured through Requirement 6 of **Application Document 3.1 Draft DCO**.<br><br>The Proposed Project is located partly within the AONB and has the potential to have an impact upon the AONB so the duty to seek to further purposes applies and is considered above. |
| **5.10.35** | The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project. | The landscape and visual impacts of the Proposed Project are assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual.** Throughout the design process measures have been taken to reduce the landscape and visual effects of the Proposed Project as far as practicable. These measures are outlined in sections 1.7 and 1.9 of the ES Chapters, as well as the as well as the **Outline LEMP (Application Document 7.5.7.1 and 7.5.7.2)**.<br><br>Landscape and visual matters were considered in the early stages of siting and design. **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project.<br><br>There is the potential for a significant total cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1, which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore |
| **5.10.36** | In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable. | |
| **5.10.37** | The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation. | |

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| | | Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.<br><br>Whilst the Proposed Project will result in some significant adverse impacts during construction and operation, the landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed landscape visual effects wherever possible. As a result, no additional mitigation measures have been identified in addition to the embedded measures. |
| **5.10.38** | The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts. | The landscape management strategy for the Proposed Project is detailed cross **Application Document 7.5.7.1 oLEMP – Suffolk**, **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**, as secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO**. |
| ***5.11 Land Use, including Open Space, Green Infrastructure, and Green Belt*** | | |
| **5.11.8** | For development on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. | Baseline assessments and preliminary contamination risk assessments (PRA) have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure to existing ground contamination through ground disturbance for both the Suffolk and Kent Onshore Scheme. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk have been identified, further assessment |

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| | | has identified a very low/low risk to sensitive receptors. Control and management measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| **5.11.9** | The Applicant will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, Applicant's should refer to the Green Infrastructure Framework. | No loss of open space is proposed.<br>An Open Space Assessment is presented in Section 7 of **the Planning Statement**. The Proposed Project has taken a precautionary approach to the identification of potential open space.<br>The **Consultation Report (Application Document 5.1)** provides a complete overview of the consultation and stakeholder engagement activities on the Proposed Project regarding open space. There will be no material impact or loss to the function or use of the spaces identified in Suffolk and Kent, therefore, no further assessment was required. Whilst there might be some short-term disturbance during construction this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. Overall, there will be no material permanent impact or loss of open space. |
| **5.11.12** | The Applicant should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). | As set out in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils** and **Application Document 6.2.3.6 Part 2 Kent Chapter 6 Agriculture and Soils**, although the Proposed Project aims to reinstate the affected land to its pre-construction state, the Suffolk Onshore Scheme would require a total permanent land take of 11.59 ha, of which 11.45 ha is BMV land (ALC Grades 2 and 3a). For the Kent Onshore Scheme, a total permanent land take of 12.27 ha is required, of which 12.21 ha is graded as BMV land. The bulk of this loss is required for the |
| **5.11.13** | The Applicant should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. | |

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| **5.11.14** | Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination. | construction of the proposed converter stations. The location of the converter stations has been determined by the selected network connection points (Friston Substation in Suffolk and initially, Richborough Substation in Kent – noting that an alternative to this connection point is now proposed) (See **Application Document 7.3 Design Development Report f**or more information**)**, which restricts the range of potential suitable sites. Areas of search for potential converter station sites had to be located within a radius of approximately 5 km of the identified connection points. This was to ensure as short as possible AC connection between the converter station and connection point. The greater the AC cable length the greater the losses which need to be reduced with the use of reactive compensation equipment, which would result in additional land take and cost (see **Application Document 8.1 Historic Report (CPRSS)** for further details). Although the presence of provisional BMV land was a consideration in the siting of the converter stations, this had to be balanced against other key environmental and technical constraints, as explained in **Application Document 7.3 Design Development Report** which meant sites which have BMV land were chosen**.**<br><br>Mitigation measures to minimise the impact to BMV land and impacts to soil health include:<br><br>• Sensitive routeing and siting of infrastructure and temporary works;<br><br>• Rationalisation of the design to minimise permanent land take requirements;<br><br>• The temporary nature of many of the construction activities and the subsequent restoration of the land and its return to the preconstruction use is likely to result in the avoidance of long-term impacts on agricultural and soil receptors; |

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| | | • Commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>This is also supported by **Application Document 6.3.2.6.A Predictive Agricultural Land Classification Report – Suffolk, Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk, Application Document 6.3.3.6.A Predictive Agricultural Land Classification Report – Kent** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent**. Detailed management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| **5.11.15** | Development should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. | With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they |
| **5.11.17** | The Applicant should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. | |

would not have significant or permanent impacts on health or quality of life.

Baseline assessments and PRA have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure to existing ground contamination through ground disturbance for both the Suffolk and Kent Onshore Scheme. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk have been identified, further assessment has identified a very low/low risk to sensitive receptors.

Groundwater risk assessments have been undertaken for both Suffolk and Kent Onshore Scheme's and are set out in **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.** The assessments conclude that there is a low/moderate risk of existing contamination within groundwater, that could be mobilised. However, with control and management measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** the potential effects of groundwater contamination are expected to be minor due to mitigation.

Further contamination assessments were to ensure the Order Limits are suitable and safe for the Proposed Project. Ground gas monitoring and assessments undertaken by National Grid, identified no potential sources of ground gas exposure/disturbance within the Order Limits of the Suffolk Onshore Scheme and found

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| | | a low risk of potential ground source gas exposure/disturbance in the Order Limits for the Kent Onshore Scheme.<br><br>**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assess the likely air quality effects that could results from both the Suffolk and Kent Onshore Schemes. Both documents assess the existing baseline conditions and the likely changes and effects to air quality levels following the construction, operation and maintenance and decommissioning of the Proposed Project. The overall assessment of the Onshore Scheme concludes that there are no likely significant adverse air quality effects. |
| **5.11.19** | The Applicant should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. | The Proposed Project is not located within a Minerals Safeguarding Area. **Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment** presents an assessment of the mineral resources identified within the Study Area and informs the assessment on mineral resources presented in Section3.0. In accordance with paragraph 5.11.19 the Suffolk Onshore Scheme and Kent Onshore Scheme are therefore not expected to have an adverse impact on mineral resources. |
| **5.11.23** | Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction. | **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk** and **Application Document 7.5.10.2 Outline Soil Management Plan - Kent** have been prepared to ensure the effective management, protection and reinstatement of soil resources throughout the phases of the Proposed Project. The plans outline the necessary measures to minimise soil degradation and promote sustainable land use in accordance with best practice and regulatory requirements. In accordance with Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1 Draft DCO)** detailed soil management plans will be provided for approval post consent and will need to be substantially in accordance with the outline plans. |

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| **5.11.24** | Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes. | The Proposed Project has taken a precautionary approach to the identification of open space. There will be no material impact or loss to the function or use of the spaces identified in Suffolk and Kent, therefore, no further assessment was required. Whilst there might be some short-term disturbance during construction this will be temporary and where required, recreational paths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. In addition, land required temporarily is committed to being returned to its pre-construction condition as referenced in CoCP item GG07 (**Application Document 7.5.3.1 CEMP Appendix A Outline CoCP)** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1** which requires detailed management plans to be submitted and approved by the relevant local planning authority. Overall, there will be no material permanent impact or loss of open space and the Proposed Project is considered to be compliant with this policy. |
| **5.11.27** | Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured | An **AIA (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO,** has been undertaken which considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits.<br><br>The AIA concludes that in total, the Suffolk Onshore Scheme will result in the loss of 4 individual trees and part of 2 woodlands of high quality; 25 individual trees, part of 4 tree groups, part of 4 woodlands, part of 3 hedgerows and 1 hedgerow of moderate quality; and 8 individual trees, part of 10 tree groups, 5 tree groups, part of 1 woodland, part of 39 hedgerows and 11 hedgerows of low quality are likely to be removed to facilitate building of the Proposed Project. Six sections of Important Hedgerow identified as such for ecological reasons would also have sections temporarily removed for the haul route and buried |

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| | | cable. No veteran or ancient trees are to be removed and no trees subject to TPO are to be removed.<br><br>For the Kent Onshore Scheme, the **AIA (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO,** concludes that in total, 3 individual trees of moderate quality; and 5 individual trees, 10 tree groups, 5-part tree groups, 1 hedgerow and 1 part hedgerow of low quality are likely to be removed to facilitate the Proposed Project. No veteran or ancient trees are to be removed and no trees subject to TPO are to be removed.<br><br>The impacts of tree removals will be compensated through the proposed tree planting and associated landscaping works which will represent an opportunity to enhance the quality, benefits and resilience of trees within the Suffolk Onshore Scheme and Kent Onshore Scheme Order Limits. New tree planting is detailed in **Application Document 7.5.7.1 oLEMP – Suffolk**, **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**, as secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority. |
| **5.11.28** | Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources. | The Proposed Project is not located within a Minerals Safeguarding Area. **Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment** presents an assessment of the mineral resources identified within the Study Area and informs the assessment on mineral resources presented in Section3.0. |
| **5.11.30** | Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for | A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed |

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| | example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way. | Project. The **Outline PRoWMP (Application Document 7.5.9.1 Outline PRoWMP – Suffolk and Application Document 7.5.9.2 Outline PRoWMP – Kent**) explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project. The Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15). However, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. The likely impact of the Proposed Project on PRoW Diversions is considered to be not significant. |
| **5.11.32** | The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. | An Open Space Assessment is presented in Section 7 of the **Planning Statement**. The Proposed Project has taken a precautionary approach to the identification of potential open space. There will be no material impact or loss to the function or use of the spaces identified in Suffolk and Kent, therefore, no further assessment was required. Whilst there might be some short-term disturbance during construction this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. Overall, there will be no material permanent impact or loss of open space. |
| ***5.12 Noise and Vibration*** | | |
| **5.12.6** | Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:<br>• a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the | With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively, with consideration of British Standards. The Proposed Project has |

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| | noise contains particular high or low frequency content or any temporal characteristics of the noise<br>• identification of noise sensitive receptors and noise sensitive areas that may be affected<br>• the characteristics of the existing noise environment<br>• a prediction of how the noise environment will change with the proposed development<br>— in the shorter term, such as during the construction period<br>— in the longer term, during the operating life of the infrastructure<br>— at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year<br>• an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas<br>• if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise<br>• all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life | been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br>The construction mitigation measures proposed include:<br>› Construction working will be undertaken within the agreed working hours set out within the DCO.<br>› Construction traffic routes, access tracks, and construction haul routes will be surveyed for damage and irregularities (e.g. potholes) that may lead to vibration from construction traffic.<br>› The contractor will conduct detailed construction noise and vibration assessments to determine whether additional measures, including site-specific BPM, may be required.<br>› Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where practicable. |
| 5.12.8 | Applicants should consider the noise impact of ancillary activities associated with the development, such as | |

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| | increased road and rail traffic movements, or other forms of transportation. | • Members of the community and local businesses will be kept informed regularly of the works through active community liaison.<br><br>These measures and other controls are set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**, **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC and Outline Noise and Vibration Management Plans** (**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent**). Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 Draft DCO.** |
| **5.12.9** | Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies. | The assessment of operational noise for the Suffolk Onshore Scheme and Kent Onshore Scheme concludes that with appropriate noise mitigation measures in the design (e.g. plant selection, and transformer noise enclosures),the impact of operational noise from the proposed Saxmundham Converter Station, proposed Minster Substation and Minster Converter Station on all nearby NSR, has been assessed as having a small magnitude impact, during both daytime and night-time periods, taking account of the noise context. This would result in negligible to minor adverse effects at all nearby NSR, which is assessed as not significant. Noise and vibration effects from routine and more substantial maintenance activities would be mitigated through the use of BPM and may be supported by detailed noise and vibration assessment, if applicable<br><br>Regarding the proposed Friston Substation, there are no sources of operational noise (such as transformers) during the normal operation of the substation. Operational noise during the normal operation of the proposed Friston Substation would therefore be |

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| | | negligible and not significant. At the request of East Suffolk Council assessments of operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines have also been conducted. The assessments are included in **Application Document 6.3.2.9.E Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative).** These assessments indicate that operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines would be not significant. |
| **5.12.11** | In the marine environment, applicants should consider noise impacts on protected species, as well as other noise sensitive receptors, both at the individual project level and in-combination with other marine activities. | **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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme. Several activities undertaken during the lifetime of the project will generate underwater sound which may disturb or displace highly mobile species. With regard to disturbance from underwater sound, the activity with the highest sound source is the operation of the sub bottom profiler. The distance from sound source at which disturbance can occur, referred to as the Effective Deterrent Range (EDR) is 5 km. Thus, the area of disturbance from the project activities identified above is small in relation to the distribution range of the populations of concern. In addition, as project vessels are continuously moving, any disturbance impacts will be transient, intermittent, and short-term.<br>Airborne sound produced during the project life cycle is likely to be limited to vessel operation and landfall activities. Given the slow speeds at which the offshore installation vessels are known to operate during cable installation, it is unlikely that high airborne sound levels offshore will be produced. Project activities will be taking place near Goodwin Sands, where highly mobile species including seals are known to haul-out but activities will only take place at high tide and so disturbance here is unlikely. Seal surveys |

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| | | have also been undertaken at Pegwell Bay to supplement the assessment within **Application Document 6.2.4.4 Marine Mammals** and **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan** has also been included as part of the DCO application. Chapters 2, 4, 5 and 6 of the ES concludes that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project. |
| **5.12.12** | Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation. | A detailed noise impact assessment is set in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** with consideration to the NPPF and PPG**.** The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme and Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br><br>The construction mitigation measures proposed include:<br>• Construction working will be undertaken within the agreed working hours set out within the DCO. |
| **5.12.13** | The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise. | |
| **5.12.14** | Mitigation measures may include one or more of the following:<br>• engineering: reducing the noise generated at source and/or containing the noise generated<br>• lay-out: where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings<br>• administrative: using planning conditions/obligations to restrict activities allowed on the site at certain | |

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| | times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites<br>• insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building. | • Construction traffic routes, access tracks, and construction haul routes will be surveyed for damage and irregularities (e.g. potholes) that may lead to vibration from construction traffic.<br>• The contractor will conduct detailed construction noise and vibration assessments to determine whether additional measures, including site-specific BPM, may be required.<br>• Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where practicable.<br>• Members of the community and local businesses will be kept informed regularly of the works through active community liaison.<br>These measures and other controls are set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**, **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC and Outline Noise and Vibration Management Plans** (**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent**). Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of the **draft DCO (Application Document 3.1)**. |
| **5.12.16** | A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. | |
| **5.12.17** | The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:<br>• avoid significant adverse impacts on health and quality of life from noise<br>• mitigate and minimise other adverse impacts on health and quality of life from noise<br>• where possible, contribute to improvements to health and quality of life through the effective management and control of noise | |
| **5.12.18** | When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These | |

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| | requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development | |
| *5.13 Socio-Economic Impacts* | | |
| **5.13.2** | 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 4.3). | **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** provide an assessment of the likely effects on socio-economics, recreation and tourism that could arise from the construction, operation and decommissioning of the Onshore Scheme.<br><br>Both ES chapters assess the beneficial effects on employment through direct employment of construction workers and additional net employment in other sectors, during the construction phase accounting for leakage, displacement and multiplier effects. Further to this, the estimated GVA per worker during the construction phase is expected to contribute to minor beneficial effects to both the national and regional economy.<br><br>Further to this, the ES chapters assess the impacts on PRoW for both access use and recreational use. Finally, an assessment is undertaken on both of the Onshore Scheme's impact on local infrastructure, local businesses and tourism. |
| **5.13.3** | The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities. | The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with the relevant local authorities. The thematic meetings provided an opportunity for the local planning authorities to raise questions and concerns as well as discussing important points of local context to inform the assessment. Further details regarding consultation are detailed in Section 10.3 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** |

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| | | and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism.** |
| **5.13.4** | The applicant's assessment should consider all relevant socio-economic impacts, which may include:<br>• the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero the contribution to the development of low-carbon industries at the local and regional level as well as nationally<br>• the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities<br>• any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains<br>• effects (positive and negative) on tourism and other users of the area impacted<br>• 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 how populations and | **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** provide an assessment of the likely effects on socio-economics, recreation and tourism that could arise from the construction, operation and decommissioning of the Onshore Scheme. Both ES chapters assess the beneficial effects on employment through direct employment of construction workers and additional net employment in other sectors, during the construction phase accounting for leakage, displacement and multiplier effects. Further to this, the estimated GVA per worker during the construction phase is expected to contribute to minor beneficial effects to both the national and regional economy.<br><br>Social infrastructure, tourism, local accommodation facilities and local businesses are assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism.** Great Oaks Small School, StAugustine's and Stonelees Golf Clubs and Chai Stop Takeaway and Kent Waterjet Cutting are assessed in greater detail within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** due to the expected impacts on the local businesses.<br><br>An assessment of the capacity of local accommodation services within a 60-minute drive time from both Suffolk and Kent Onshore Scheme Order Limits is presented in both ES chapters, to evaluate if there is sufficient capacity to house the construction workers. |

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| | service provision change as a result of the development<br>• cumulative effects - if development consent were to be granted 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 | An assessment of PRoW is also presented in both ES chapters, which assess the Proposed Project's impact on access and recreational use of PRoW.<br>Cumulative effects are considered in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects**, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects, Application Document 6.2.3.12 Part Kent Chapter 12 Intra-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects.** |
| **5.13.5** | Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies | The existing socio-economic conditions are considered within Section 10.7 of both **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism and Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism**, while local planning policy is reviewed in Section 10.2. |
| **5.13.6** | Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses.<br>Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain. | **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism and Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** provide an assessment of the Proposed Projects impact on tourism and local businesses in Section 10.9 of the ES chapters. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during the construction phase, and the impact of changing influx of construction workers on the availability of local accommodation facilities. |
| **5.13.7** | Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required | During construction and decommissioning there would be sufficient capacity to accommodate the workforce within a 60-minute drive time from the Order Limits of both the Suffolk Onshore Scheme and Kent Onshore Scheme. Similarly, there would be a negligible effect on local healthcare facilities as there is |

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| | | sufficient FTE GPs to accommodate the additional construction workforce as patients. |
| **5.13.8** | The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike | The Suffolk and Kent Onshore Scheme has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce socio-economic, recreation and tourism impacts and effects through the process of design development. This has included:<br>• Sensitive routing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economics, recreation and tourism receptors;<br>• Utilising trenchless methods at landfall to minimise potential impacts on walking/cycling routes set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br>Further control and management measures have also been incorporated into the Onshore Scheme to help mitigate any adverse socio-economic, recreation and tourism effects. Such measures are set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| **5.13.9** | The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision. | **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** conclude that there are likely to be socio-economic beneficial effects on employment through direct employment of construction workers and additional net employment in other sectors, during the construction phase accounting for leakage, displacement and multiplier effects. |

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| | | Further to this, the estimated GVA per worker during the construction phase is expected to contribute to minor beneficial effects to both the national and regional economy.<br>Great Oaks Small School, Chai Stop Takeaway and Kent Waterjet Cutting are expected to be impacted during the construction of the Kent Onshore Scheme, due to induced severance and St Augustine's and Stonelees Golf Clubs are expected to experience land use impacts during construction and operation due to monitoring purposes. However, the effects on each of the local businesses are considered negligible due to the coordination with the businesses, temporary access arrangements and the temporary and infrequent nature of the works. No other significant effects are expected to impact any other recreational or tourist facilities.<br>It is expected that there will be some minor to moderate adverse effects on PRoW as a result of construction. However, mitigation and management measures have been devised to avoid and/or reduce the adverse effects on PRoW, which are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent**. In addition, National Grid has sought to avoid future PRoW disturbance with the siting of the Saxmundham Converter Station. |
| **5.13.10** | The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS). | Assertion of socio-economic impacts are supported by evidence both **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism**, for the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. |
| **5.13.11** | The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as | The Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff, with an average of 86 gross direct FTE jobs estimated to be required onsite per annum over the construction period. Of the average 86 gross direct FTE staff, it is |

| Paragraph | Policy Requirement | Compliance with policy |
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| | well as any options for phasing development in relation to the socio-economic impacts. | expected that 30% of the workforce will be sourced from the study area, resulting in 26 FTE jobs per annum for residents within the study area during the construction phase. Further to this, it is expected that the temporary annual employment generated by the Suffolk Onshore Scheme accounting for leakage, displacement and multiplier effects would support, on average, 65 total net jobs per annum during the construction period. Of these, 20 jobs per annum would be expected to be taken up by residents in the 60 minute drive time study area.<br><br>The Kent Onshore Scheme will require a peak workforce of 241 FTE staff, with an average of 86 gross direct FTE jobs estimated to be required onsite per annum over the construction period. Of the average 67 gross direct FTE staff it is expected that 30% of the workforce will be sourced from the study area, resulting in 20 FTE jobs per annum for residents within the study area during the construction phase. Further to this, it is expected that the temporary annual employment generated by the Kent Onshore Scheme accounting for leakage, displacement and multiplier effects would support, on average, 50 total net jobs per annum during the construction period. Of these, 15 jobs per annum would be expected to be taken up by residents in the 60 minute drive time study area. As such, the Kent Onshore Scheme is expected to result in short-term temporary minor beneficial socio-economic effects. |
| **5.13.12** | The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted. | 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 given the number of construction workers anticipated, and that National Grid has not identified any likely significant effects in relation to construction employment. |
| ***5.14 Traffic and Transport*** | | |

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| **5.14.5** | If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG)266 and Welsh Governments WelTAG267 provides guidance on modelling and assessing the impacts of transport schemes. | In accordance with Paragraphs 5.14.5 and 5.14.6 of NPS EN-1, the application includes a transport appraisal and the scope and approach taken for the transport assessments has been agreed with National Highways and the relevant Highways Authorities.<br><br>The assessment of traffic generated during construction, operation and decommissioning of the Proposed Project concludes that there will be no significant adverse effects on either the strategic (SRN) or local road networks.<br><br>Impacts on the local highway network and SRN are also not significant during the construction phase. Impacts would be temporary and would be managed through the measures set out in the outline plans are provided as part of the application submission (**Application Document 7.5.1.1 Outline Construction Traffic Management (OCTMP) and Travel Plan- Suffolk** and **Application Document 7.5.1.2 OCTMP- Kent**) with detailed plans to be brought forward under Schedule 3 Requirement 6 of **Application Document 3.1 draft DCO** to be substantially in accordance with the OCTMP. This includes travel planning measures which will be directed at construction staff, management of HGV's and Abnormal loads. A limited number of temporary diversions and crossing points are required for PRoWs affected by the construction of the Proposed Project. The Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. **Application Document 7.5.9.1 Outline PRoWMP – Suffolk** and **Application Document 7.5.9.2 Outline PRoWMP – Kent** explain the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project.<br><br>In response to NPS EN-1 paragraph 5.14.12, consideration has been given to the shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and |
| **5.14.6** | National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted. | |
| **5.14.7** | The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to:<br>• reduce the need for parking associated with the proposal<br>• contribute to decarbonisation of the transport network<br>• improve user travel options by offering genuine modal choice | |
| **5.14.12** | If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable | |

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| | alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles. | inland waterways. As set out in Table 7-1 of A**pplication Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** and Table 7-1 of **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**, the requirements of the Proposed Project are such that the only feasible method, resulting in least disruption, is to make use of the existing highway network during both the construction and operational phases. However, as noted above no significant adverse effects are anticipated as a result of the construction phase nor the operational phase.<br><br>In response to NPS EN-1 Paragraph 5.14.21, no significant adverse cumulative effects on the SRN or local road network are expected as a result of construction traffic generated by the Suffolk Onshore Scheme and Kent Onshore Scheme when combined with construction/ operational traffic associated with other committed developments in isolation or when considering all committed developments combined. |
| **5.14.14** | The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:<br>• 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<br>• make sufficient provision for HGV parking,and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions<br>• ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force. | |
| **5.14.16** | Applicants should consider the DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" when preparing their application[271] | |
| **5.14.18** | A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by | |

| Paragraph | Policy Requirement | Compliance with policy |
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| | enhancing active, public and shared transport provision and accessibility. | |
| **5.14.21** | The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision. | |
| ***5.15 Resource and Waste Management*** | | |
| **5.15.8** | The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities. | Site waste shall be managed in a structured and auditable manner in accordance with the agreed Material and Waste Management Plan, from the commencement of the Proposed Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. The document will set out the decisions taken during the planning and design stages to minimise construction waste and set objectives and targets for the main waste types. The production of this plan is secured through Application Document 7.5.3 Onshore CEMP and Requirement 6 of Schedule 3 of Application Document 3.1. Further details on Construction Waste are found in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.<br><br>A waste management storage area would be designated as part of the compound to facilitate the segregation of waste. This area would be delineated and separated from where new material is |
| **5.15.9** | The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. | |
| **5.15.10** | The applicant is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste and 'Towards Zero Waste: Our Waste Strategy for Wales and should seek to minimise the volume of waste produced and the volume of | |

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| | waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome. | stored, with recycling and waste bins kept clean and clearly marked in order to avoid cross-contamination of materials.<br>During earthworks activities, material would be segregated following excavation to better enable its re-use. Topsoil would be removed first and stored separately to deeper sub-soil. This would enable the material to be re-used as topsoil during reinstatement.<br>Material excavated as part of the underground cable installation would be re-used as backfill within the trenches if deemed to have suitable thermal properties to comply with the proposed cable system design.<br>Excess sub-soil and top-soil would be used as part of the landscaping works where viable limiting the need to remove it from site.<br>A **Statement of Statutory Nuisance (Application Document 6.7)** is submitted with the DCO Application. This states that any waste produced on the Proposed Project is expected to be low in volume and is not expected to be contaminated. Accumulations or deposits of excavated material or waste are not predicted to cause a nuisance or be prejudicial to health during construction or operation of the Proposed Project. |
| **5.15.12** | The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible. | |
| **5.15.13** | Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused. | |
| **5.15.14** | The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. | |
| | The Secretary of State should be satisfied that:<br>• any such waste will be properly managed, both on-site and off-site.<br>• the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing | |

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| | waste management facilities to deal with other waste arisings in the area.<br>• adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome. | |
| ***5.16 Water Quality and Resources*** | | |
| **5.16.3** | Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10). | **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** presents the assessment of the likely significant water environment effects that could result from the Proposed Project. The construction of the Suffolk and Kent Onshore Schemes has the potential to impact on water quality and resources associated with:<br>• construction of watercourse crossings;<br>• piling activities;<br>• soil stripping and earthworks;<br>• establishment and use of construction compounds;<br>• changes to land surface permeabilities due to earthworks, and the introduction of hard surfacing; and<br>• interception of land drainage routes and disruption to existing field drainage.<br>These impacts would be temporary and deemed not significant. There are no likely significant effects expected in relation to water quality and resources.<br>Once constructed, the Proposed Project would pose a low risk of contamination given the water treatment measures and other mitigation that will be in place. The temporary culverts would also |

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| | | be removed and watercourse channels will be reinstated. As a result, no likely significant effects on water quality and resources are anticipated during operation.<br><br>Decommissioning activities such as temporary compounds, dismantling and demolition would be expected to take place in accordance with the relevant permits, good practice and mitigation measures. No likely significant effects associated with decommissioning of the Suffolk and Kent Onshore Schemes are therefore anticipated.<br><br>The assessment set out in **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** concludes that no significant effects on water quality from the Offshore Scheme are predicted. |
| **5.16.4** | The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. | Details on how consultation responses have informed the assessment can be found in **Application Document 5.1 Consultation Report** and **Application Document 5.1.9 Appendix H Summary 2023 Response.** A series of water environment thematic meetings have been held with the Environment Agency, Suffolk stakeholders (including the Suffolk County Council and East Suffolk Council) and Kent stakeholders (including the Kent County Council, Thanet District Council and Dover District Council). Engagement with the Kent Stour Internal Drainage Board and Marine Management Organisation has also taken place. |
| **5.16.7** | The ES should in particular describe:<br>• the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges | **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**, **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** and **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish** presents the assessment of the relevant likely significant effects that could result from the Proposed Project. The assessment sets out existing water quality and resources and considers potential |

| Paragraph | Policy Requirement | Compliance with policy |
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| | • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance<br>• existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics<br>• any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions<br>• how climate change could impact any of the above in the future<br>• any cumulative effects | impacts upon the water environment, water bodies and protected areas, the effects of climate change and cumulative effects. |
| **5.16.11** | Activities that discharge to the water environment are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating | The measures embedded within the design of the Proposed Project mitigate the risks of pollution of the watercourses that would receive drainage discharges from operational above ground infrastructure are summarised in Section 4.8 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and are secured in the DCO via |

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| | to works to, and structures in, on, or under controlled waters. | commitments within **Application Document 7.5.3.2 CEMP Appendix B REAC**. |
| **5.16.12** | The Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. | The assessments 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** has been prepared with reference to the specific objectives set for relevant waterbodies within the Anglian River Basin Management Plan and South East River Basin Management Plan.<br>**Application Document 6.9 Water Framework Directive Assessment** documents the Water Framework Directive (WFD) assessment undertaken for the proposed reinforcement. The assessment has followed a staged approach in accordance with Planning Inspectorate WFD Advice, updated in September 2024, and has been informed by extensive engagement with the Environment Agency.<br>The WFD assessment makes it clear that the Proposed Project is not likely to cause deterioration of the WFD status of the waterbodies interacting with the Proposed Project and therefore the requirement for the SoS to refuse consent is not engaged. |
| **5.16.14** | The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential | |

# Appendix Table A.2 National Policy Statement for Renewable Energy Infrastructure (EN-3)

| Paragraph | Policy requirement | Compliance with policy |
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| ***1.6 Infrastructure covered by this NPS*** | | |
| 1.6.2 | In England, this NPS will also apply to renewable generation proposals of the types listed above, whose capacity is below the relevant threshold, which are directed into the NSIP regime under section 35 of the Planning Act 2008. | The Proposed Project, is defined as a bootstrap and is directed into the NSIP regime under section 35 of the Planning Act 2008. NPS EN-3 therefore applies to the Proposed Project. |
| 1.6.3 | Similarly, it will apply to offshore transmission infrastructure projects in English waters which are directed into the NSIP regime under section 35 of the Planning Act 2008. This could include interconnectors, Multi-Purpose Interconnectors (MPIs) or 'bootstraps' to support the onshore network which are routed offshore. EN-5 also applies to offshore transmission infrastructure projects in English waters which are directed into the NSIP regime | |
| ***2.3 Factors influencing site selection and design*** | | |
| 2.3.2 | The specific criteria considered by applicants and the weight they give to them will vary from project to project. | The **Design Development Report (Application Document 7.3)** provides an overview of National Grid's approach to options appraisal and the routeing and siting process, as well as the design rationale for the Proposed Project<br><br>**Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** presents the main alternatives considered by National Grid in the development of the Proposed Project and provides a summary of the main reasons for selecting |
| 2.3.3 | Where there are requirements on applicants or the Secretary of State to consider specific factors, these are made clear in the text. | |
| 2.3.4 | The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in | |

| Paragraph | Policy requirement | Compliance with policy |
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| | Section 4.1 of EN-1, will not grant consent in any given case. | the chosen options, including a comparison of the environmental effects. |
| 2.3.5 | It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure. In specific circumstances it may be appropriate to provide some direction or guidance, for example to areas of search or areas to avoid through Marine Plans, Strategic Environmental Assessments (SEAs) or The Crown Estate Leasing Rounds, in respect of marine renewable technology. All of the examples given consider marine specific aspects of many of the assessment principles set out in Part 4 of EN-1. | **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** provides a detailed summary of the routeing and siting appraisal relevant to the evolution of the Offshore Scheme. |
| 2.3.6 | When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure. | The Suffolk Onshore Scheme is partly located within the Suffolk and Essex Coast and Heaths AONB. Exceptional circumstances can be demonstrated to justify the proposed development in the AONB, as set out in Section 7.3 of the Planning Statement.<br><br>Both the Suffolk Onshore Scheme and Kent Onshore Scheme traverse SSSIs (Leiston-Aldeburgh SSSI and Sandwich Bay to Hacklinge Marshes SSSI, respectively) using trenchless methods. The assessment presented in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** conclude that there would be no significant adverse effects on these designated sites during construction and operation. It has also been concluded that there would be no significant intra-project and inter-project cumulative effects on designated sites during the |

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| | | construction and operation of both schemes (**Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects, Application Document 6.2.3.12 Part 3 Kent Chapter 12 Intra-Project Cumulative Effects, Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects**). The exception test in paragraph 5.4.8 of NPS EN-1 is therefore not applicable.<br><br>Notwithstanding, the Proposed Project comprises CNP Infrastructure: the starting point for the SoS decision-making is to consider that these relevant tests have been met. |
| 2.3.8 | In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target. | The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm to two designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm to one non-designated heritage asset of schedulable quality.<br><br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of the Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. A more detailed |

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| | | response is set out in relation to Section 5.9 of NPS EN-1 above. |
| 2.3.12 | Applicants must obtain a lease from The Crown Estate or Crown Estate Scotland prior to placing any offshore structures on, or passing cables over, the seabed and its foreshore. | A lease with The Crown Estate has been sought. Negotiations with The Crown Estate are ongoing. |
| 2.3.16 | Marine Licences are required for all the marine elements of a proposed offshore development (up to Mean High Water Springs), including associated development such as the cabling, offshore substations that are required, and any other aspects of a development that the appropriate licensing authority, such as the MMO or NRW, may consider licensable under s66 of the Marine and Coastal Access Act 2009. | A deemed Marine Licence is included in the draft DCO. |
| 2.3.17 | Under section 58 of the Marine and Coastal Access Act 2009 (MCAA) the MMO makes all authorisation or enforcement decisions in accordance with marine plans and the Marine Policy Statement (MPS), unless relevant considerations indicate otherwise. This is also reflected in the MMO's input for the Secretary of State's consideration during the Development Consent Order (DCO) process. | Section 8 of **the Planning Statement** refers to the relevant marine plans and the Marine Policy Statements and considers how the Proposed Project accords with these. It is supported by Appendix B: MPS Accordance Table. |
| 2.3.18 | Any DCO granted by the Secretary of State may include provisions deeming the grant of a Marine Licence for operations carried out wholly in England and English waters, or the Welsh Zone of the REZ. | A deemed Marine Licence is included in the draft DCO. |
| 2.3.19 | The MMO is responsible for the enforcement, ongoing management and discharge of licence | |

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| | conditions, for operations carried out in English waters and the Northern Ireland offshore region. | |
| 2.3.23 | Applicants much approach the Marine Licensing regulator (MMO in England and NRW in Wales) early in the pre-application process to ensure that they are aware of any needs for additional marine licence consents alongside their DCO application. | National Grid has engaged with the MMO at an early stage. This engagement to date is documented in **Application Document 7.4.4 Draft Statement of Common Ground Marine Management Organisation.** |
| ***2.4 Climate change adaption and resilience*** | | |
| 2.4.8 | Whilst offshore wind farms will not be affected by flooding, applicants should demonstrate that any necessary land-side infrastructure (such as cabling and onshore substations) will be appropriately resilient to climate-change induced weather phenomena. Similarly, applicants should particularly set out how the proposal would be resilient to storms. | This paragraph requires demonstration of how infrastructure will be resilient to climate change. Section 6.4 of **the Planning Statement** explains the embedded measures which have been integral in reducing, and where possible avoiding, the climate change effects of the Proposed Project. This includes the flood mitigation measures detailed in **Application Document 6.2.2.4 Environmental Statement Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Environmental Statement Part 3 Kent Chapter 4 Water Environment** and commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC w**hich is secured through Requirement 6 in Schedule 3 of the **Application Document 3.1 Draft DCO.** A more detailed response is provided at Section 4.10 of NPS EN-1. |
| ***2.5 Consideration of good design for energy infrastructure*** | | |
| 2.5.1 | Section 4.7 of EN-1 sets out the criteria for good design that should be applied to all energy infrastructure | Section 6.3 of **the Planning Statement** explains how the Proposed Scheme has taken into account the criteria for good design. |

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| 2.5.2 | Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage. | The **Design Development Report (Application Document 7.3)** provides an overview of the design rationale for the Proposed Project and how the design choices have sought to reduce the environmental effects of the Proposed Project. It demonstrates that the design has embedded mitigation measures in order to avoid or reduce significant environmental effects where practicable.) This report also explains that the Proposed Project has undergone an iterative design process which has been informed by the outcomes of statutory consultation and stakeholder engagement, ongoing environmental assessments, engineering and design considerations, and collaboration with other developers.<br><br>Opportunities for co-existence/co-location are detailed in **Application Document 7.10 Coordination Document.** |
| ***2.6 Flexibility*** | | |
| 2.6.1 | Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case. | To maintain flexibility in the design and layout and ensure the reasonable worst case scenario has been assessed in the EIA and considered by the SoS, the Proposed Project has adopted the Rochdale Envelope approach in accordance with Planning Inspectorate's Advice Note nine (The Planning Inspectorate, 2018). This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Proposed Project where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that |
| 2.6.2 | Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed. | |

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| | | the likely worst case scenario is presented in the assessment of potential environmental effects from the Proposed Project.<br><br>To accommodate unexpected issues in the routing and siting of infrastructure when more detailed ground investigation information is available, or even during construction, a spatial tolerance will be applied for to allow small changes to the location of linear elements of the infrastructure be made; the extent of this tolerance is known as the 'limits of deviation' or LoD, and the Order Limits that will eventually be applied for will need to encompass the LoD.<br><br>Some flexibility is likely to be required for non-linear aspects of the Proposed Project, for example the layout of converter stations. Design parameters are therefore applied to state the maximum dimensions and potential locations within the compound. Section 4.2 of **the Planning Statement** sets out the flexibility measures taken to allow for small changes to the location of linear elements of infrastructure.<br><br>For the River Fromus Bridge Crossing, two different height options are proposed. Further details are provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** |
| ***2.8 Offshore Wind*** | | |
| 2.8.5 | In addition, this section on offshore wind makes many references to cabling and offshore transmission. Applicants bringing forward proposals for that infrastructure should note all such references; cabling refers to all types of electricity network | This paragraph notes that section 2.8 of NPS EN-3 is also relevant to all types of electricity network infrastructure including offshore transmission. |

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| | infrastructure including offshore transmission as well as the inter-array cables for a wind farm. | |
| ***Marine Planning*** | | |
| 2.8.17 | Marine plans provide a transparent framework for consistent, evidence-based decision making and should be used by applicants to guide site selection. | Section 6.3 of the Planning Statement summarises the Proposed Project's design and site selection process. This is also documented in detail in the following reports:<br>• **Application Document 7.2 Strategic Options Back Check Report:** this report sets out why the Proposed Project is needed and what strategic options were considered to meet the identified need case.<br>• **Application Document 8.1 Historic Report 1 (CPRSS)**: this report explains how the routeing and siting of the Proposed Project was undertaken (following the selection of the strategic option) and the reasons for the selection of the emerging preferences which were consulted upon during non-statutory consultation.<br>• **Application Document 8.2 Historic Report 2 (Option Selection and Design Evolution Report):** this report explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation.<br>• **Application Document 7.3 Design Development Report**: this report summarises |

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| | | the key design decisions from the two historical reports above and sets out how the design of the Proposed Project evolved from statutory consultation to the Proposed Project as applied for, taking into account feedback received from stakeholders.<br>• **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**: this ES chapter provides an overview of the main alternatives considered at each stage of the design development (from strategic options to the proposal as applied for).<br>• **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** this ES chapter provides a detailed summary of the routeing and siting appraisal relevant to the evolution of the Offshore Scheme from the identification of the strategic option to the definition of the Offshore Scheme Boundary.<br>As set out in Section 4 of **the Planning Statement,** the relevant marine plans for the Proposed Project are the East Inshore and East Offshore Marine Plans and the South East Inshore Marine Plan. Section 8 of the Planning Statement provides an assessment of the compliance of the Offshore Scheme against the relevant policies of these marine plans. |
| 2.8.34 | As identified in paragraphs 3.3.65 – 3.3.83 and Section 4.11 of EN-1, and Section 2.12 of EN-5, a | National Grid has coordinated with other projects through the process of routing and siting and design |

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| | more co-ordinated approach to offshore-onshore transmission is required. | development, as set out in **Application Document 7.10 Coordination Document**. This has included choosing a shared point of connection and exploring the concept of co-locating converter stations, sharing cable corridors and landfalls and also considering coordination in project delivery. |
| 2.8.35 | The previous standard approach to offshore-onshore connection involved a radial connection between single wind farm projects and the shore. A coordinated approach will involve the connection of multiple, spatially close, offshore wind farms and other offshore infrastructure, wherever possible, as relevant to onshore networks. | National Grid has coordinated with other projects at the project development stage for the Offshore element of the Proposed Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. Further details on this process are available in **Application Document 7.10 Coordination Document.** |
| 2.8.47 | Prior to the submission of an application involving the development of the seabed, applicants should | National Grid has undertaken extensive consultation throughout the development of the Proposed Project |

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| | engage with key stakeholders, such as The Crown Estate and statutory bodies to ensure they are aware of any current or emerging interests on or underneath the seabed which might give rise to a conflict with a specific application. This will ensure adequate opportunity to reduce potential conflicts and increase time to find a resolution. | and this is ongoing. This is described in the Consultation Report and its supporting appendices, and includes the stages listed below:<br>• Between 24 October and 18 December 2022, an initial non-statutory consultation was held. This was an opportunity to explain why the reinforcement is needed, set out the options considered, and receive early feedback.<br>• Between 24 October and 18 December 2023, a statutory consultation on the refined proposals for Sea Link was held.<br>• Targeted Consultation took place between 8 July to 5 August 2024 due to a small number of refinements on the Proposed Project.<br>Statutory consultees with feedback relevant to physical processes included the MMO, Natural England, the EA, East Suffolk Council.<br>National Grid has had regard to all feedback it has received in response to its consultations when developing the Proposed Project. This is described in the Consultation Report (**Application Document 5.1 Consultation Report**) and the Consultation Report Appendices (**Application Document 5.1.1 to 5.1.11**). |
| 2.8.48 | Applicants are encouraged to work collaboratively with those other developers and sea users on co-existence/co-location opportunities, shared mitigation, compensation and monitoring where appropriate. Where applicable, the creation of statements of common ground between developers | National Grid has coordinated with other projects through the process of routeing and siting and design development, as set out in **Application Document 7.10 Coordination Document**. This has included choosing a shared point of connection and exploring |

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| | is recommended. Work is ongoing between government and industry to support effective collaboration and to find solutions to facilitate to greater coexistence/co-location | the concept of co-locating converter stations, sharing cable corridors and landfalls.<br><br>Impacts and mitigation to maximise co-existence with commercial fisheries, shipping and navigation and other sea users are discussed in **Application Document 6.3.4.7 Part 4 Marine Chapter 7 Shipping and Navigation, Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** and **Application Document 6.3.4.9 Part 4 Marine Chapter 9 Other Sea Users.** |
| 2.8.50 | The applicant will also need to consider impacts on civil and military radar and other aviation and defence interests (Section 5.5 of EN-1). | Likely significant effects on offshore infrastructure, including military practice and exercise areas, have been considered in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users**. |
| 2.8.52 | Given the scale of offshore wind deployment required to meet 2030 and 2050 ambitions, applicants will need to give close consideration to impacts on MPAs, either alone or in combination, and employ the mitigation hierarchy, and if necessary provide compensation (both individually and in combination with other plans or projects) which may be needed to approve their projects. | A Marine Conservation Zone (MCZ) Assessment is provided at **Application Document 6.11 Marine Conservation Zone Assessment**. The assessment concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of Proposed Project related activities. |
| 2.8.53 | It is likely that mitigation may include proactive measures to reduce the impact of deployment e.g., micrositing of offshore transmission routes to avoid vulnerable habitats, alternatives piling or trenching techniques, noise abatement technology, collision avoidance methods or, if necessary, compensation for habitat loss. See Section 2.8.80 for Offshore Wind Environmental Standards. | The **ES (Application Document 6.2)** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Proposed Project. Section 7 of **the Planning Statement** sets out the measures taken to mitigate the impacts, broken down by various themes. |

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| 2.8.56 | Applicants are expected to seek advice from SNCBs and Defra for projects in England, in conjunction with relevant regulators, Local Planning Authorities and/or landowners, on potential mitigation and/or compensation requirements at the earliest opportunity and comply with future statutory requirements and/or guidance once available. | National Grid has undertaken extensive consultation throughout the development of the Proposed Project and this is ongoing. This is described in the **Consultation Report** and its supporting appendices **(Application Document 5.1 Consultation Report and Application Document 5.1.1 to 5.1.11)** National Grid has had regard to all feedback it has received in response to its consultations when developing the Proposed Project. This is described in the Consultation Report (**Application Document 5.1 Consultation Report**) and the Consultation Report Appendices (**Application Document 5.1.1 to 5.1.11**).<br><br>This includes engagement with Natural England which was undertaken during the statutory consultation and following this with several meetings being held.<br><br>The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site. **Application Document 6.6 HRA** is provided with the DCO Application. The HRA concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>**Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment concluded that the |

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| | | conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| 2.8.63 | It is expected that greater coordination of offshore-onshore transmission infrastructure is likely to reduce the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections. | It is acknowledged that these coordination policies are primarily for the purposes of offshore wind development and therefore are not directly relevant to the Proposed Project which is a 'bootstrap'.<br><br>Notwithstanding, National Grid has coordinated with other projects through the process of routeing and siting and design development, as set out in **Application Document 7.10 Coordination Document**.<br><br>The Proposed Project has considered the potential for colocation when selecting the landfall at Aldeburgh and has designed this, and the onward HVDC cable corridor, in a way that leaves sufficient space for up to two other projects to be constructed to the north, broadly along the same corridor and using the same landfall therefore reducing the potential geographical extent of other future offshore transmission projects .<br><br>As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS |
| 2.8.64 | Where applicants seek consent for offshore transmission infrastructure separately from proposals for offshore wind development, for example Multi-Purpose Interconnectors or subsea 'onshore' transmission also referred to as bootstraps, (see Glossary and 2.12.3 in EN-5), consideration should be given at a strategic level to the overall environmental impacts of the offshore development and transmission infrastructure. | |
| 2.8.68 | The applicant should assess the effects of the offshore transmission and any associated infrastructure on the marine, coastal and onshore environment. | |

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| | | process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. Further details on this process are available in **Application Document 7.10 Coordination Document.**<br><br>National Grid has assessed the effects of the Offshore Scheme on the marine, coastal and onshore environment as evidenced by the relevant chapters of the ES (**Volume 6 Environmental Statement).** |
| 2.8.69 | Where the applicant does not know the precise location of the offshore transmission cables and any associated infrastructure, a corridor should be identified within which the specific infrastructure is proposed to be located. | To accommodate unexpected issues in the routing and siting of infrastructure when more detailed ground investigation information is available, or even during construction, a spatial tolerance will be applied for to allow small changes to the location of linear elements of the infrastructure be made; the extent of this tolerance is known as the 'limits of deviation' or LoD, and the Order Limits that will eventually be applied for will need to encompass the LoD. The cable configuration for the Offshore Scheme is assumed to be one bundled HVDC and one fibre optic cable (two cables) in one trench. With a bundled approach, the two cables and the fibre optic cable would be combined into a single bundle as shown in |

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| | | **Application Document 2.13.4 Design Drawings – Offshore.**<br><br>The lateral LoD is illustrated on **Application Document 2.5.3 Work Plans – Offshore**. |
| 2.8.71 | Applicants are expected to demonstrate compliance with mitigation measures identified by The Crown Estate in any plan-level HRA produced as part of its leasing rounds and with any future statutory requirements, guidance or mitigation measures developed to deliver the commitments in the British Energy Security Strategy, including on Offshore Wind Environmental Standards (see 2.8.90 – 2.8.92 below) and other measures under the Offshore Wind Environmental Improvement Package which covers offshore wind electricity infrastructure. | Plan-level HRAs produced by The Crown Estate as part of its leasing rounds are not relevant to the Proposed Project. |
| 2.8.72 | Assessment of environmental effects of transmission infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure. | The cumulative impacts resulting from the Proposed Project are assessed in the following documents:<br><br>• **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project;**<br><br>• **Application Document Number 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects;**<br><br>• **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects;**<br><br>• **Application Document Number 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects;** |

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| | | • **Application Document Number 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects;**<br>• **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Offshore Intra Cumulative Effects; and**<br>• **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Offshore Inter Cumulative Effects.** |
| 2.8.73 | Applicants should include details on how avoidance has been achieved, good design principles have been followed and provide proposals for mitigation. If the development is in English and Welsh waters, they should also demonstrate that they have considered how their proposals can contribute towards environmental net gain. | **Application Document 7.3 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Proposed Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable.<br><br>**Application Document 7.12.1 Design Principles – Suffolk** and **Application Document 7.12.2 Design Principles – Kent** have been prepared to accompany the Application. They provide the guiding principles for the detailed design of the Proposed Project.<br><br>Habitat loss as a result of the Offshore Scheme will be highly localised to the cable corridor and will not impact wider ecosystem functioning or biodiversity. Furthermore, any habitat disturbance will be temporary and would be expected to recover over short periods of time.<br><br>**Application Document 6.12 Biodiversity Net Gain Feasibility Report** is submitted with the application |

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| | | which covers Biodiversity Net Gain for the Suffolk and Kent Onshore Schemes |
| 2.8.76 | Micrositing/microrouting provides developers with flexibility to accommodate any unforeseen events, such as the discovery of previously unknown marine archaeology that it would be preferable to leave in situ. It can also be used to avoid sensitive habitats and designated environmental features. | A full assessment of the potential impacts of the Offshore Scheme on marine heritage assets is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**.<br><br>The assessment concludes that, with the implementation of mitigation measures presented in section 6.8 of the chapter, the residual effects of all potential impacts on marine heritage assets should be reduced to between negligible adverse and minor beneficial, which are not considered significant.<br><br>Locations of known marine archaeological interest/value within the marine environment will be avoided by all marine vessels by the implementation of appropriately-sized Archaeological Exclusions Zones (AEZs). No works that could impact the seabed will be undertaken within the extent of an AEZ during the construction, operation and maintenance or decommissioning phases of the Offshore Scheme. Archaeological features of lower archaeological value (geophysical anomalies of archaeological potential) will be avoided where practicable within the marine and coastal/intertidal areas through micrositing of the cable route and siting of infrastructure and temporary works. This helps to ensure the protection of important heritage assets in situ, and also shows that micrositing will be used to avoid the risk of damage to archaeology. |
| 2.8.77 | To inform micrositing/microrouting applicants should undertake high-resolution survey work and make provision for investigative work, such as archaeological examination, to assess the impacts of any proposed cables or foundation placement on potential heritage assets. | |
| 2.8.78 | Applicants should submit an outline archaeological Written Scheme of Investigation (WSI) as part of the DCO submission, with a commitment to complete a project specific WSI post-consent in consultation with Historic England. | |
| 2.8.79 | Where the applicant requests micrositing or microrouting tolerance, and insofar as it is reasonably possible to do so, the applicant should factor this tolerance into the environmental impact assessment of the development's worst-case scenario. | |

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| | | **Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B of Environmental Actions and Commitments (REAC)** outline mitigation measures and strategies to be put in place that follow the mitigation hierarchy in order to, in first instance avoid or minimise archaeological impacts and effects through the process of design development. Where avoidance is not possible, embedded mitigation is proposed in order to reduce impacts.<br><br>As part of the mitigation measures, a Written Scheme of Investigation (WSI) including a Protocol for Archaeological Discoveries will be agreed with the Archaeological Curator via the Regulator and implemented prior to works commencing (**Application Document 7.5.5 Outline Offshore Written Scheme of Investigation (WSI)** is submitted with the application). The Protocol of Archaeological Discoveries will be established to support the reporting of unexpected archaeological material during the lifetime of the Proposed Project. |
| 2.8.83 | Where requested by the Secretary of State applicants are required to undertake environmental monitoring (e.g., ornithological surveys, geomorphological surveys, archaeological surveys) prior to and during construction and operation. | This has been undertaken as part of the Environmental Impact Assessment for the Proposed Project and is detailed within the ES. Details on further monitoring are set out in **Application Document 7.5.3.2 Outline CEMP Appendix B REAC** which is secured by Requirement 6 of Schedule 2 in **Application Document 3.1 Draft DCO**. |
| 2.8.89 | Where requested by the Secretary of State, applicants should submit a decommissioning programme, satisfying the requirements of s.105(8) | There are no plans to decommission the Proposed Project given the anticipated increase in electricity demand in the future. Most elements of the Proposed |

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| | of the Energy Act 2004 before any offshore construction works begin, to demonstrate a commitment to ensure any long-term environmental impacts are removed following decommissioning. | Project have design lifespans of approximately 40 years (with the exception of pylons which have a typical lifespan of up to 80 years), The design life of the Proposed Project could be extended with regular maintenance, refurbishment and replacement of each component. Further details on this are set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning would be submitted for approval to the relevant planning authority at least six months prior to any decommissioning works, as set out in Requirement 13 in Schedule 3 of **Application Document 3.1 Draft Development Consent Order**. The decommissioning works would follow National Grid's processes at that point in time, for assessing and mitigating any environmental impacts. |
| 2.8.98 | In addition, applicants should have regard to the specific ecological and biodiversity considerations that relate to proposed offshore renewable energy infrastructure developments, namely:<br>• fish (see Section 2.8.250 of this NPS).<br>• intertidal and subtidal seabed habitats and species (see Section 2.8.233 of this NPS).<br>• marine mammals (see Section 2.8.237 of this NPS).<br>• birds (see Section 2.8.240 of this NPS); and | **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 5 Marine Mammals** and **Application Document 6.2.4.5 Part 4 Marine Chapter 6 Ornithology** assess impacts to biodiversity from the Offshore Scheme. Chapters 2, 4, 5 and 6 of the ES concludes that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project. |

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| | • wider ecosystem impacts and interactions, and other relevant protected migratory species. | The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site. **Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in LSEs on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>**Application Document 6.11 Marine Conservation Zones** Assessment is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected. |
| 2.8.101 | Applicants must undertake a detailed assessment of the offshore ecological, biodiversity and physical impacts of their proposed development, for all phases of the lifespan of that development, in accordance with the appropriate policy for offshore wind farm EIAs, HRAs and MCZ assessments (See Sections 4.3 and 5.4 of EN-1). | |
| 2.8.102 | Applicants need to consider environmental and biodiversity net gain as set out in Section 4.6 of EN-1 and the Environment Act 2021. | |
| 2.8.103 | Applicants should assess the potential of their proposed development to have net positive effects on marine ecology and biodiversity, as well as negative effects. | |

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| | | The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required.<br><br>As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report,** the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. In order to achieve minimum 10% net gain, an additional 257.47 units would be required for Area Units. For the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and |

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| | | for watercourse units. In order to achieve minimum 10% net gain, an additional 47.58 units would be required for hedgerows, 6.67 units for areas and 6.96 units for watercourses.<br><br>**Application Document 6.12 Biodiversity Net Gain Feasibility Report** states that National Grid is committed to the delivery of a minimum of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies |
| 2.8.111 | The construction, operation and decommissioning of offshore energy infrastructure, including the preparation and installation of the cable route and any electricity networks infrastructure can affect the following elements of the physical offshore environment, which can have knock on impacts on other biodiversity receptors:<br><br>• water quality – disturbance of the seabed sediments or release of contaminants can result in direct or indirect effects on habitats and biodiversity, as well as on fish stocks thus affecting the fishing industry;<br><br>• waves and tides – the presence of the turbines can cause indirect effects through change to wave climate and tidal currents on flood and coastal erosion risk management, marine | **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Processes** presents information about the environmental assessment of the potential physical processes effects that could result from the construction, operation and decommissioning of the Offshore Scheme. This includes the relevant assessments and impacts stated in paragraphs 2.8.111-2.8.113 relevant to the Proposed Project which are addressed in section 1.9 of the same document. |

ecology and biodiversity, marine archaeology and potentially coastal recreation activities;

- scour effect – the presence of wind turbines and other infrastructure can result in a change in the water movements within the immediate vicinity of the infrastructure, resulting in scour (localised seabed erosion) around the structures. This can indirectly affect navigation channels for marine vessels, marine archaeology, and impact biodiversity and seabed habitats;
- sediment transport – the resultant movement of sediments, such as sand across the seabed or in the water column, can indirectly affect navigation channels for marine vessels, and could affect sediment supply to sensitive coastal sites and impact biodiversity and seabed habitats;
- suspended solids – the release of sediment during construction, operation and decommissioning can cause indirect effects on marine ecology and biodiversity;
- sandwaves – the modification/clearance of sandwaves can cause direct physical (such as in affecting unknown archaeological remains) and ecological effects both at the seabed and within the water column due to disturbance and suspension of sediment, and potentially indirect effects (e.g., changes to seabed morphology in water depths where waves can influence the seabed, which can in turn affect wave climate and sediment transport); and

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| | • water column – wind turbine structures can also affect water column features such as tidal mixing fronts or stratification due to a change in hydrodynamics and turbulence around structures. | |
| 2.8.112 | Applicant assessments are expected to include predictions of the physical effects arising from modifications to hydrodynamics (waves and tides), sediments and sediment transport, and sea bed morphology that will result from the construction, operation and decommissioning of the required infrastructure. | |
| 2.8.113 | Assessments should also include effects such as the scouring that may result from the proposed development and how that might impact sensitive species and habitats. | |
| 2.8.114 | Applicants should undertake geotechnical investigations as part of the assessment, enabling the design of appropriate construction techniques to minimise any adverse effects. | **Application Document 6.2.4.2 Part 4 Marine Chapter 1 Physical Processes** presents information about the environmental assessment of the potential physical processes effects that could result from the construction, operation and decommissioning of the Offshore Scheme. This has included a sediment transport model to assess sediment dispersion distances associated with different types of cable burial techniques (**Application Document 6.3.4.1.A Suspended Sediment Modelling**).<br><br>With the implementation of the design mitigation and management measures, the assessment concludes that the residual effects resulting from the Proposed Project on offshore physical processes during construction, operation and maintenance and |

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| | | decommissioning, are small or negligible, therefore not significant in EIA terms.<br><br>Mitigation measures include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP** which are secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft DCO.** |
| 2.8.119 | Applicant assessment of the effects of installing offshore transmission infrastructure across the intertidal/coastal zone should demonstrate compliance with mitigation measures in any relevant plan-level HRA including those prepared by The Crown Estate as part of its leasing round, and include information, where relevant, about:<br><br>• any alternative landfall sites that have been considered by the applicant during the design phase and an explanation for the final choice;<br><br>• any alternative cable installation methods that have been considered by the applicant during the design phase and an explanation for the final choice;<br><br>• potential loss of habitat;<br><br>• disturbance during cable installation, maintenance/repairs and removal (decommissioning);<br><br>• increased suspended sediment loads in the intertidal zone during installation and maintenance/repairs; | **Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in LSEs on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>**Application Document 6.11 Marine Conservation Zones** Assessment is submitted with the DCO |

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| | • potential risk from invasive and non-native species;<br>• predicted rates at which the intertidal zone might recover from temporary effects, based on existing monitoring data; and<br>• protected sites. | Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected.<br><br>The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| 2.8.123 | The applicant should demonstrate compliance with mitigation measures identified by The Crown Estate | **Application Document 6.6 HRA i**s not a plan level HRA produced as part of the Crown Estates leasing |

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| | in any plan-level HRA produced as part of its leasing round. | round and therefore there is no requirement to demonstrate compliance. |
| 2.8.124 | Applicants should follow guidelines for leasing transmission assets infrastructures, and any successor to it produced by The Crown Estate. | |
| 2.8.125 | All work associated with cable installation including trenching, laying and surface protections are licenced through a Deemed Marine Licence as part of the DCO, with the exception of Welsh inshore waters,(defined as the region extending seaward 12 nautical miles from Mean High Water Springs (MHWS) to the territorial limit) where a Marine Licence cannot be deemed. In all offshore windfarm cases however, applicants should be aware that the operation and maintenance of cables after construction may require new Marine Licences | A deemed Marine License is applied for with **Application Document 3.1 Draft DCO.** |
| 2.8.126 | Applicant assessment of the effects on the subtidal environment should include:<br>• loss of habitat due to foundation type including associated seabed preparation, predicted scour, scour protection and altered sedimentary processes, e.g. sandwave/boulder/UXO clearance;<br>• environmental appraisal of inter-array and other offshore transmission and installation/maintenance methods, including predicted loss of habitat due to predicted scour and scour/cable protection and sandwave/boulder/UXO clearance; | **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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme. Chapters 2, 4, 5 and 6 of the ES concludes that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project.<br>**Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in LSEs on the integrity |

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| | • habitat disturbance from construction and maintenance/repair vessels' extendable legs and anchors;<br>• increased suspended sediment loads during construction and from maintenance/repairs;<br>• predicted rates at which the subtidal zone might recover from temporary effects;<br>• potential impacts from EMF on benthic fauna;<br>• potential impacts upon natural ecosystem functioning;<br>• protected sites; and<br>• potential for invasive/non-native species introduction. | of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary. |
| 2.8.129 | If construction and associated noise levels are likely to lead to an offence under Part 3 of the Habitats Regulations (which would include deliberately disturbing, injuring or killing), applicants will need to apply for a wildlife licence to allow the activity to take place. | **Application Document 6.11 Marine Conservation Zones** Assessment is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected. |
| 2.8.131 | Where necessary, assessment of the effects on marine mammals should include details of:<br>• likely feeding areas and impacts on prey species and prey habitat;<br>• known birthing areas/haul out sites for breeding and pupping;<br>• migration routes; | The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species |

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| | • protected sites;<br>• baseline noise levels;<br>• predicted construction and soft start noise levels in relation to mortality, permanent threshold shift (PTS), temporary threshold shift (TTS) and disturbance;<br>• operational noise;<br>• duration and spatial extent of the impacting activities including cumulative/in-combination effects with other plans or projects;<br>• collision risk;<br>• entanglement risk; and<br>• barrier risk. | (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required.<br><br>**Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** includes, where relevant, an assessment of the effects detailed in paragraph 2.8.131 |
| 2.8.133 | The applicant should discuss any proposed noisy activities with the relevant statutory body and must reference the joint JNCC and SNCB underwater noise guidance, and any successor of this guidance, in relation to noisy activities (alone and in combination with other plans or projects) within SACs, SPAs, and Ramsar sites, in addition to the JNCC mitigation guidelines for piling, explosive use, and geophysical surveys. NRW has a position | **Application Document 6.6 HRA, Application Document 6.11 Marine Conservation Zone Assessment** and **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish** present an assessment of the likely effects on marine ecology, including underwater sound (excluding UXO) taking into consideration guidance from JNCC. The assessments conclude that there are no likely |

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| | statement on assessing noisy activities which should also be referenced where relevant. | significant effects on marine ecology as a result of underwater noise. |
| 2.8.134 | Where the assessment identifies that noise from construction and UXO clearance may reach noise levels likely to lead to noise thresholds being exceeded (as detailed in the JNCC guidance) or an offence as described in paragraph 2.8.127- 2.8.129 above, the applicant must look at possible alternatives or appropriate mitigation. | Assessments of underwater sound impacts from unexploded ordinance (UXO) clearance will be addressed in a separate marine licence application once the number and nature of UXO present in the Offshore Scheme is known. |
| 2.8.151 | Applicant assessments should identify the potential implications of underwater noise from construction and unexploded ordnance including, where possible, implications of predicted construction and soft start noise levels in relation to mortality, permanent threshold shift (PTS), temporary threshold shift (TTS) and disturbance, and addressing both sound pressure and particle motion) and EMF on sensitive fish species. | |
| 2.8.153 | The UK fishing industry is diverse. The type and significance of impacts will therefore vary depending on the section of the fleet affected. Applicants should consider both direct impacts on fishing activity and indirect impacts such as displacement (on both the industry and Marine Protected Sites) and the ability of fishers to relocate. | The assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** has considered both direct impacts on fishing activities and indirect impacts such as displacement.<br><br>Consultation was undertaken with relevant fisheries stakeholders. Details on the specific stakeholders consulted is included in Section 8.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries**. This consultation is on-going and will continue after submission of the ES. This includes consideration of co-existence and co- |
| 2.8.154 | Applicants should undertake early consultation with a crosssection of the fishing industry, as well as MMO, SNCBs, relevant Inshore Fisheries and Conservation Authorities (IFCAs), Defra and Welsh Government, to identify impacts, and actively encourage input from | |

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| | active fishers to provide evidence of their use of the area to support the impact assessments. | location. Further details on consultation are set out in Section 8.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries**.<br><br>Detailed baseline information and the potential significant effects of the Proposed Project on fish and shellfish species, including species of commercial importance, are assessed in **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology**. The findings of the Fish and Shellfish chapter are cross referenced to inform potential impacts on commercial fishing where appropriate. |
| 2.8.155 | Where any part of a proposal involves a grid connection or transmission to shore or in the inshore area, appropriate inshore fisheries groups should also be consulted. | |
| 2.8.157 | Applicant assessments should include robust baseline data and detailed surveys of the effects on fish stocks of commercial interest, and any potential reduction or increase in such stocks that will result from the presence of the wind farm development and of any safety zones (see paragraph 2.8.152 – 2.8.164 of this NPS). The assessments should also provide evidence regarding any likely benefits or constraints on fishing activity within the project's boundaries. | |
| 2.8.158 | Applicants will be expected to undertake dialogue with the fishing industry during the planning and design of individual offshore wind farm and transmission proposals to maximise the potential for co-existence/co-location and reduce potential displacement. | |
| 2.8.159 | Applicants should consider guidance on best practice for fisheries liaison, which has been jointly agreed by the renewables industry and fishing community. | Embedded measures have been integral for reducing the Proposed Projects impact on commercial fisheries. **Application Document 7.5.3.2 Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, sets out mitigation measures to maintain a Fisheries Liaison Officer (FLO) and fisheries working group(s) throughout the construction phase to ensure project information is effectively disseminated, dialogue is |

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| | | maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season |
| 2.8.167 | The marine historic environment can be affected by offshore wind farm and offshore transmission development in two principal ways:<br><br>from direct effects arising from the physical siting of the development itself such as the installation of wind turbine foundations and electricity cables, or the siting of plant required during the construction phase of development; and<br><br>from indirect changes to the physical marine environment (such as scour, coastal erosion or sediment deposition) caused by the proposed infrastructure itself or its construction (see the policy on physical environment at paragraphs 2.8.111 of this NPS). | **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely marine archaeological effects that could arise from the Proposed Project.<br><br>The assessment concludes that with sensitive design and management measures, detailed in **Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B of REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** there are expected no likely significant direct or indirect effects to the marine historic environment as a result of the Proposed Project. |
| 2.8.168 | Applicants should consult with the relevant statutory consultees, such as Historic England or Cadw, on the potential impacts on the marine historic environment at an early stage of development during pre-application, taking into account any applicable guidance (e.g., offshore renewables protocol for archaeological discoveries). | The significance of marine heritage receptors has been discussed in the Baseline Conditions (Section 6.7) section of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.** Data has been obtained from several sources (listed within section 6.4) including the National Marine Heritage Record (NMHR) and Historic Environment Records (HERs) for Suffolk and Kent. Consultation has been undertaken with Historic England during the Scoping and Statutory Consultation phases. Further details are contained within Section 6.3 of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.** |

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| 2.8.169 | Assessment of potential impacts upon the historic environment should be considered as part of the Environmental Impact Assessment process undertaken to inform any application for consent. | **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely marine archaeological effects that could arise from the Proposed Project. A desk-based assessment has been undertaken to assess the known and potential archaeological features within the marine historic environment within the study area (**Application Document 6.3.4.6.A Appendix 4.6.A Marine Archaeological Technical Report**) |
| 2.8.170 | Desk based studies to characterise the features of the historic environment that may be affected by a proposed development and assess any likely significant effects should be undertaken by competent archaeological experts. | |
| 2.8.171 | These studies should consider any geotechnical or geophysical surveys that have been undertaken to aid the wind farm and/or offshore transmission design. | Section 6.4 of **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** sets out the approach and methodology to the assessment. This includes data gathering from Geotechnical and Geophysical Surveys, |
| 2.8.172 | Whilst it should be possible for a development project to avoid designated heritage assets, the knowledge currently available about the historic environment in the inshore and offshore areas is limited, as much of the seafloor around our coasts and at sea has yet to be mapped or explored fully. | National Grid has undertaken an iterative design process which responds to policy requirements, and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on heritage and archaeological assets **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely significant marine archaeological effects that could result from the Proposed Project. This chapter is supported by **Application Document 6.3.4.6.A Part 4 Offshore Scheme Appendix 4.6.A Marine Archaeological Technical Report**, which outlines known and potential marine heritage assets within the |
| 2.8.173 | Applicants are required to determine how any known heritage assets might best be avoided. | |
| 2.8.174 | The applicant will be expected to conduct all necessary examination and assessment exercises using a variety of survey techniques to plan the development so as to optimise opportunities for avoidance. | |
| 2.8.175 | Once a site has been chosen, it may be necessary to undertake further archaeological assessment, | |

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| | including field evaluation investigations prior to construction, to understand a known site's significance and full extent, and, to identify as yet unknown heritage assets when considering the options for detailed site development, in accordance with an archaeological written scheme of investigation included with the application. | study area (comprising a 100m buffer around the extent of the Offshore Scheme's Order Limits) and assesses the significance and sensitivity of known and potential marine heritage assets.<br>**Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B of REAC** outline mitigation measures and strategies to be put in place that follow the mitigation hierarchy in order to, in first instance avoid or minimise archaeological impacts and effects through the process of design development. Where avoidance is not possible, embedded mitigation is proposed in order to reduce impacts. This is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft DCO**.<br>As part of the mitigation measures, a WSI including a Protocol for Archaeological Discoveries will be agreed with the Archaeological Curator via the Regulator and implemented prior to works commencing (**Application Document 7.5.5 Outline Offshore WSI** is submitted with the application). The Protocol of Archaeological Discoveries will be established to support the reporting of unexpected archaeological material during the lifetime of the Proposed Project.<br>The assessment presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** concludes that, with the implementation of mitigation measures (summarised in sections 6.7 and 6.10 of the chapter), the residual effects of all potential impacts should be reduced to |

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| | | between negligible adverse and minor beneficial (not significant). |
| 2.8.176 | Assessment may also include the identification of any beneficial effects on the marine historic environment, for example through improved access or the contribution to new knowledge that arises from investigation. | **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely marine archaeological effects that could arise from the Proposed Project. |
| 2.8.177 | Where elements of a proposed project (whether offshore or onshore) may interact with historic environment features that are located onshore, applicants should assess the effects in accordance with Section 5.9 in EN-1. | **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** assess the onshore impacts of the Proposed Project. |
| 2.8.178 | Offshore wind farms and offshore transmission will occupy an area of the sea or sea bed. For offshore wind farms in particular it is inevitable that there will be an impact on navigation in and around the area of the site. This is relevant to both commercial and recreational users of the sea who may be affected by disruption or economic loss because of the proposed offshore wind farm and/or offshore transmission. | The Proposed Project includes an Offshore cable and therefore will occupy a smaller area of the seabed when compared with a Wind Farm. During operation, other than maintenance, there would minimal offshore activity. Embedded measures have been integral in reducing the adverse effects of the Proposed Project on shipping and navigation. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>Following the implementation of the above embedded mitigation measures, risks to navigational safety will be reduced to tolerable and as low as reasonably practicable, provided that the recommendations for |

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| | | further risk reduction are implemented or otherwise closed out satisfactorily. |
| 2.8.184 | Applicants should engage with interested parties in the navigation sector early in the pre-application phase of the proposed offshore wind farm or offshore transmission to help identify mitigation measures to reduce navigational risk to ALARP, to facilitate proposed offshore wind development. This includes the MMO or NRW in Wales, MCA, the relevant General Lighthouse Authority, such as Trinity House, the relevant industry bodies (both national and local) and any representatives of recreational users of the sea, such as the Royal Yachting Association (RYA), who may be affected. This should continue throughout the life of the development including during the construction, operation and decommissioning phases. | Consultation was undertaken with relevant interested parties. This includes consultation with the Maritime and Coastguard Agency, relevant ports and Trinity House. Further details are set out in Section 7.3 of **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation.** Continued consultation is secured within **Application Document 7.5.3.2 Outline CEMP Appendix B REAC** which is secured through Requirement 6 of Schedule 3 within **Application Document 3.1 Draft DCO.**<br><br>**Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation** demonstrates that with appropriate mitigation and management measures, the Proposed Project and navigation and shipping, are able to co-exist successfully. |
| 2.8.185 | Engagement should seek solutions that allow offshore wind farms, offshore transmission, and navigation and shipping users of the sea to co-exist successfully. | |
| 2.8.189 | Applicants must undertake a Navigational Risk Assessment (NRA) in accordance with relevant government guidance prepared in consultation with the MCA and the other navigation stakeholders listed above. | A Navigational Risk Assessment has been undertaken and can be found at **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment.** |
| 2.8.204 | Applicants should address impact on seascape in addition to the landscape and visual effects discussed in Section 5.10 of EN-1. | It is assessed in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**, that during the construction and operation and maintenance of the Proposed Project that there is the potential for temporary or permanent changes to the |

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| | | character of the seascape. However, the assessment concludes that, with the implementation of embedded and additional mitigation measures, the potential residual effects on the character of the seascape during construction and operation and maintenance are considered to be not significant. |
| 2.8.213 | Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting SACs SPAs, and Ramsar sites and/or MCZs. It is essential that applicants involve SNCBs, other statutory environmental bodies (e.g. Historic England) and Defra, in conjunction with the relevant regulators, as early as possible in the planning process to enable discussions of what is and isn't a significant and/or adverse effect, subsequent implications, and, if required, mitigation and/or compensation. | The environmental impacts of the Proposed Project have been assessed as reported in the **Environmental Statement** and are discussed in **the Planning Statement.** With the mitigation hierarchy having been followed, and appropriate mitigation implemented, and relative to the large-scale nature of the Proposed Project. Mitigation Measures are set out within **Application Document 7.5.3.2 Outline CEMP Appendix B REAC w**hich is secured through Requirement 6 of Schedule 3 within **Application Document 3.1 Draft DCO.** |
| 2.8.224 | Applicants are expected to have considered the best ecological outcomes in terms of potential mitigation. These might include:<br>• avoidance of areas sensitive to physical effects;<br>• consideration of micro-siting of both the array and cables;<br>• alignment and density of the array;<br>• design of foundations;<br>• ensuring that sediment moved is retained as locally as possible; | The ES, assesses the Proposed Projects impacts on Marine ecology, specifically on the following topics:<br>• Benthic ecology<br>• Fish and shellfish<br>• Marine mammals<br>• Ornithology<br>Mitigation measures have been embedded in the design of the Proposed Project to ensure that there would be no likely significant adverse effects on benthic ecology, fish and shellfish, marine mammals and ornithology as a result of the construction, |

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| | • the burying of cables to a necessary depth;<br>• using scour protection techniques around offshore structures to prevent scour effects, or designing turbines to withstand scour, so scour protection is not required or is minimised. | operation and maintenance and decommissioning phases of the Offshore Scheme. These include commitments made **within Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. Embedded mitigation measures include:<br>• Sensitive routeing and siting of infrastructure and temporary works.<br>• A biosecurity plan to be produced following the latest guidance on INSS.<br>• Target burial depth (Depth of Lowering (DOL)) of the cable between 1 m to 2.5 m across the route of the Offshore Scheme (subject to local geology and obstructions) to minimise effects to fish caused by EMF.<br>• Best practice mitigation measures to prevent spillages from occurring and to minimise disturbance of sediments.<br>• **Application Document 7.8 Red Throated Diver Protocol**, as secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft DCO**: this sets out a range of measures to minimise disturbance to red-throated diver<br>• **Application Document 7.5.2 Outline Offshore CEMP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this outlines measures to manage dust, |

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| | | waste, water, noise, vibration and soil during construction.<br>• **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this highlights overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities on marine mammals. |
| 2.8.227 | Landfall and cable installation and decommissioning methods should be designed appropriately to minimise effects on intertidal/coastal habitats, taking into account other constraints | The Suffolk landfall is located on the coast, between Aldeburgh and Thorpeness. Trenchless techniques will be used under the transition zone between the onshore and offshore elements, with the entry/exit point located entirely in the subtidal environment. Therefore, there will be no direct impacts to intertidal benthic ecology receptors at this location.<br>The Kent landfall is located at Pegwell Bay within the Sandwich Bay to Hacklinge Marshes SSSI. This site is designated for the protection of a range of habitats, such as dunes and coastal grasslands above the marine environment, and saltmarsh and mudflats in the intertidal environment. As with the Suffolk landfall, a trenchless solution, such as HDD, will be employed at the landfall and will avoid the saltmarsh habitat entirely and minimse effects on habitats. The entry/exit point will be located within the intertidal zone. |
| 2.8.228 | Where applicable, use of horizontal directional drilling techniques (HDD) should be considered as a method to avoid impacts on sensitive habitats and species. | The Leiston-Aldeburgh SSSI lies within the Order limits of the Suffolk Onshore Scheme. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2** |

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| 2.8.229 | Where HDD is proposed, the applicant should provide a mitigation plan to account for the possibility that HDD fails. | **Ecology and Biodiversity** considers the impact of the Suffolk onshore Scheme on this SSSI. The SSSI would be traversed using trenchless methods. One such technique which could be used being Horizontal Direct Drilling (HDD). The trenchless bore would be approximately 8 m below the SSSI at the boundary and would get deeper from there, so there is minimal risk to surface habitats and hydrology. Since the potential for habitat loss is so low, this is considered a negligible impact on receptors of national importance and thus not significant.<br><br>North Warren RSPB Reserve and the Disused Railway Line (Aldringham-Aldeburgh) CWS lie within the proposed Suffolk Onshore Scheme. As set out above in relation to Leiston-Aldeburgh SSSI, which is in a similar location, the use of HDD means the potential for habitat loss is so low, and therefore is considered to result in a negligible impact on these sites and thus not significant.<br><br>As with the Suffolk landfall, a trenchless solution, such as HDD, will be employed at the Kent landfall, located at Pegwell Bay within the Sandwich Bay to Hacklinge Marshes SSI and will avoid the saltmarsh habitat entirely. The entry/exit point will be located within the intertidal zone. |
| 2.8.231 | Where cumulative effects on intertidal habitats are predicted as a result of the cumulative impact of multiple cable routes applicants of various schemes are encouraged to work together to ensure that the number of cables crossing the intertidal/coastal zone are minimised, and installation and decommissioning | The environmental impacts of the Proposed Project have been assessed as reported in the **Environmental Statement** and are discussed in **Application Document 7.1 Planning Statement.** With the mitigation hierarchy having been followed, |

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| | phases are coordinated to ensure that disturbance is also reasonably minimised. | and appropriate mitigation implemented, and relative to the large-scale nature of the Proposed Project. |
| 2.8.233 | Applicants should design construction, maintenance and decommissioning methods appropriately to minimise effects on subtidal habitats, taking into account other constraints. | Mitigation measures have been embedded in the design of the Proposed Project to ensure that there would be no likely significant adverse effects on benthic ecology, fish and shellfish, marine mammals and ornithology as a result of the construction, operation and maintenance and decommissioning phases of the Offshore Scheme. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. Embedded mitigation measures include:<br>• Sensitive routeing and siting of infrastructure and temporary works.<br>• A biosecurity plan to be produced following the latest guidance on INSS.<br>• Target burial depth (Depth of Lowering (DOL)) of the cable between 1 m to 2.5 m across the route of the Offshore Scheme (subject to local geology and obstructions) to minimise effects to fish caused by EMF.<br>• Best practice mitigation measures to prevent spillages from occurring and to minimise disturbance of sediments.<br>• **Application Document 7.8 Red Throated Diver Protocol**, as secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft** |
| 2.8.234 | Mitigation measures which applicants are expected to have considered include:<br>• surveying and micrositing of the turbines, designing array layout, or re-routing of the export and inter-array cables to avoid adverse effects on sensitive/protected habitats, biogenic reefs or protected species;<br>• Reducing as much as possible the amount of infrastructure that will cause habitat loss in sensitive/protected habitats;<br>• burying cables at a sufficient depth, taking into account other constraints, to allow the seabed to recover to its natural state; and<br>• the use of anti-fouling paint could be minimised on subtidal surfaces in certain environments, to encourage species' colonisation on the structures, unless this is within a soft sediment MPA and thus would allow colonisation by species that would not normally be present. | |
| 2.8.235 | Where cumulative impacts on subtidal habitats are predicted as a result of multiple cable routes, applicants for various schemes are encouraged to work together to ensure that the number of cables | |

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| | crossing the subtidal zone is minimised and installation/ decommissioning phases are coordinated to ensure that disturbance is reasonably minimised. | **DCO**: this sets out a range of measures to minimise disturbance to red-throated diver<br>• **Application Document 7.5.2 Outline Offshore CEMP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this outlines measures to manage dust, waste, water, noise, vibration and soil during construction. |
| 2.8.236 | It is expected that a more co-ordinated approach to offshore onshore transmission will be delivered going forward | |
| 2.8.250 | Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCAs, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales. | **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this highlights overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities on marine mammals.<br><br>Appropriate liaison with terrestrial planning authorities and other regulators, including the representatives of the fish industry and Marine Management Organisation (MMO), has taken place during the preparation of the DCO Application and is detailed in **Application Document 5.1 Consultation Report**. |
| 2.8.251 | Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment. | **Application Document 7.10 Coordination Document** explains the types of coordination considered by National Grid to date as part of the Sea Link Project. Coordination in the approach to consenting; site and routing selection; design; and delivery of the Proposed Project with other proximate projects has been considered appropriately and has been, and can be, achieved where practicable. |

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| 2.8.252 | The avoidance of important heritage assets to ensure their protection in situ, is the most effective form of protection. | National Grid has undertaken an iterative design process which responds to policy requirements, and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on heritage and archaeological assets **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely significant marine archaeological effects that could result from the Proposed Project. This chapter is supported by **Application Document 6.3.4.6.A Part 4 Marine Appendix 4.6.A Marine Archaeological Technical Report**, which outlines known and potential marine heritage assets within the study area (comprising a 100m buffer around the extent of the Offshore Scheme's Order Limits) and assesses the significance and sensitivity of known and potential marine heritage assets.<br><br>The assessment presented in A**pplication Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** concludes that, with the implementation of mitigation measures (summarised in sections 6.7 and 6.10 of the chapter), the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial (not significant). Details regarding conservation are presented in section 1.11 **Application Document 7.5.5 Outline WSI**.<br><br>Locations of known marine archaeological interest/value within the marine environment will be |
| 2.8.253 | This can be achieved through the implementation of exclusion zones around known and potential heritage assets which preclude development activities within their boundaries. | |
| 2.8.255 | The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology. | |
| 2.8.257 | To ensure a programme of archaeological works has been secured, an outline WSI, covering the entirety of the defined project area and full duration of the project, that complies with the policy in this NPS, should be submitted within the application. | |

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| | | avoided by all marine vessels by the implementation of appropriately-sized Archaeological Exclusions Zones (AEZs). No works that could impact the seabed will be undertaken within the extent of an AEZ during the construction, operation and maintenance or decommissioning phases of the Offshore Scheme. Archaeological features of lower archaeological value (geophysical anomalies of archaeological potential) will be avoided where practicable within the marine and coastal/intertidal areas through micrositing of the cable route and siting of infrastructure and temporary works.<br><br>**Document 7.5.3.1 Appendix A Outline COCP** and **Application Document 7.5.3.2 Appendix B of Environmental Actions and Commitments (REAC)** outline mitigation measures and strategies to be put in place that follow the mitigation hierarchy in order to, in first instance avoid or minimise archaeological impacts and effects through the process of design development. Where avoidance is not possible, embedded mitigation is proposed in order to reduce impacts.<br><br>As part of the mitigation measures, a Written Scheme of Investigation (WSI) including a Protocol for Archaeological Discoveries will be agreed with the Archaeological Curator via the Regulator and implemented prior to works commencing (**Application Document 7.5.5 Outline Offshore Written Scheme of Investigation (WSI)** is submitted with the application). The Protocol of Archaeological Discoveries will be established to support the |

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| | | reporting of unexpected archaeological material during the lifetime of the Proposed Project. |
| 2.8.265 | With increasing deployment of offshore wind farms and offshore transmission, environmental impacts upon SACs SPAs, and Ramsar sites and MCZs (individually and as part of a network) may not be addressed by avoidance, reduction, or mitigation alone, therefore compensatory measures (through derogation for SACs SPAs, Ramsar sites, and MCZs may be required at a plan or project level where adverse effects on site integrity and/or on conservation objectives cannot be ruled out. | The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site. **Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in LSEs on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation or compensation is considered necessary.<br><br>**Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned |

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| | | activities for the Proposed Project and the MCZ sites that could be affected. The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| 2.8.302 | The Secretary of State should consider the effects of a proposed development on marine ecology and biodiversity, considering all relevant information made available by the applicant. | **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** |

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| 2.8.303 | The Secretary of State should be satisfied that, in the development of the proposal, the applicant has made appropriate, and extensive, use of up-to-date evidence from previous deployments and research results from scientific peer reviewed papers, and the programmes listed in paragraph 2.8.107 and assessed through HRA/MCZ processes (including the mitigation hierarchy), the impact on any protected species or habitats, as well as having regard to requirements set out in 5.4.39 of EN-1 (e.g. the Environment Act) and Good Environmental Status under the UK Marine Strategy. | **Marine Chapter 4 Marine Mammals** and **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme. Chapters 2, 4, 5 and 6 of the ES concludes that no significant effects to marine ecology and biodiversity are anticipated as a result of the Proposed Project. The assessments have been made with the use of appropriate evidence and research.<br><br>**Application Document 6.6 HRA** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in LSEs on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements of the draft DCO, it is concluded that the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>**Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO |
| 2.8.305 | Where adverse effects on site integrity/conservation objectives are predicted, the Secretary of State should consider the extent to which the effects are temporary or reversible, and the timescales for recovery. The Secretary of State should also consider the extent to which the effects may impede achievement of the MPA target (including any interim target) set under the Environment Act 2021. | |

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| | | Application. The MCZ assessment identifies the potential impacts that could arise from the planned activities for the Proposed Project and the MCZ sites that could be affected. The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| 2.8.309 | The Secretary of State must be satisfied that the design of the wind farm, offshore transmission and methods of construction, including use of materials, are such as to reasonably minimise the potential for | Mitigation measures have been incorporated into the project design to reduce the physical processes effects of the Proposed Project so that they are not likely to be significant. These include commitments |

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| | impact on the physical environment. This could involve, for instance, the exclusion of certain foundations because of their impacts or minimising quantities of rock that are used to protect cables whilst taking into account other relevant considerations such as safety | made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. The assessments conclude that the Proposed Project would not have any adverse effects on physical processes. |
| 2.8.311 | The Secretary of State should be satisfied that cable installation and decommissioning has been designed sensitively, considering intertidal/coastal habitats. | Mitigation measures have been embedded in the design of the Proposed Project to ensure that there would be no likely significant adverse effects on benthic ecology, fish and shellfish, marine mammals and ornithology as a result of the construction, operation and maintenance and decommissioning phases of the Offshore Scheme. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. Embedded mitigation measures include:<br>• Sensitive routeing and siting of infrastructure and temporary works.<br>• A biosecurity plan to be produced following the latest guidance on INSS.<br>• Target burial depth (Depth of Lowering (DOL)) of the cable between 1 m to 2.5 m across the route of the Offshore Scheme (subject to local geology and obstructions) to minimise effects to fish caused by EMF. |
| 2.8.313 | Unless suitable noise mitigation measures can be imposed by requirements to any development consent the Secretary of State may refuse the application. | |

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| | | • **Application Document 7.5.2 Outline Offshore CEMP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this outlines measures to manage dust, waste, water, noise, vibration and soil during construction.<br>• **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**: this highlights overarching principles and detailed measures to minimise as far as reasonably practicable and mitigate the effects of the construction activities on marine mammals.<br>The ES demonstrates that the Proposed Project successfully avoids and mitigates significant adverse effects on marine ecology and other important ecological features such as habitats and species. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases. All residual effects on benthic ecology, fish and shellfish, marine mammals and ornithology from the Proposed Project have been assessed as not significant. |
| 2.8.317 | The Secretary of State should be satisfied that activities have been designed considering sensitive subtidal environmental aspects, and discussions with the relevant conservation bodies have taken place. | **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 Marine** |

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| | | **Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme. Chapters 2, 4, 5 and 6 of the ES concludes that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project.<br><br>Mitigation measures have been incorporated into the project design to reduce the physical processes effects of the Proposed Project so that they are not likely to be significant. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>Appropriate liaison with terrestrial planning authorities and other regulators, including the Marine Management Organisation (MMO), has taken place during the preparation of the DCO Application and is detailed in **Application Document 5.1 Consultation Report**. |
| 2.8.318 | The Secretary of State should be satisfied that the site selection process has been undertaken in a way that reasonably minimises adverse effects on fish stocks, including during peak spawning periods and the activity of fishing itself. | National Grid has engaged with stakeholders, communities and landowners throughout the site selection process and development of the Environmental Statement through the Scoping and PEIR consultation and Expert Topic Groups (please refer to **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation** for further details).<br><br>**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** |

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| | | **and Shellfish, 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** assess impacts to biodiversity from the Offshore Scheme including the cable route. These chapters conclude that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project.<br><br>**Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** concludes that the impact of the Offshore Scheme on fishing activities, including fish stocks, is expected to have no likely significant effects |
| 2.8.319 | The Secretary of State should consider the extent to which the proposed development occupies any recognised important fishing grounds, and whether the project would prevent or significantly impede protection of sustainable commercial fisheries or fishing activities. | There is potential for effects of moderate significance to occur on static and mobile gear fisheries, related to the loss and alteration of fishing grounds during the construction, operational and decommissioning phases. However, embedded measures have been integral to reducing the effects of the Proposed Project on commercial fisheries. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. They are summarised in Sections 8.8 and 8.10 of **Application Document 6.2.4.8 Part 4 Marine Chapter 9 Commercial Fisheries**. One of these measures included in **Application Document 7.5.3.2 Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** is to maintain a Fisheries Liaison Officer (FLO) and fisheries working group(s) throughout the |

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| | | construction phase 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. Therefore, with appropriate mitigation measures it is considered that the effects of the Proposed Project on fishing grounds and activities are not significant. |
| 2.8.320 | Where the Secretary of State considers the wind farm or offshore transmission would significantly impede protection of sustainable fisheries or fishing activity at recognised important fishing grounds, this should be attributed a correspondingly significant weight. | With embedded mitigation measures, as set out in **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline COCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, the Proposed Project is not considered to have significant adverse effects on important fishing grounds or activities and therefore, significant weight should not be attributed. |
| 2.8.321 | The Secretary of State should consider adverse or beneficial impacts on different types of commercial fishing on a case-bycase basis. | |
| 3.8.322 | The Secretary of State should be satisfied that the applicant has sought to design the proposal having consulted the MMO or NRW in Wales, Defra or Welsh Government in Wales and representatives of the fishing industry with the intention of minimising the loss of fishing opportunity taking into account effects on other marine interests. Guidance has been jointly agreed by the renewables and fishing industries on how they should liaise, with the intention of allowing the two industries to co-exist successfully. | Appropriate liaison with terrestrial planning authorities and other regulators, including the MMO, and local fishing organisations has taken place during the preparation of the DCO Application and is detailed in **Application Document 5.1 Consultation Report**. |
| 3.8.323 | The Secretary of State will need to consider the extent to which disruption to the fishing industry, whether short term during preconstruction (e.g. surveying) or construction or long term over the | There is potential for effects of moderate significance to occur on static and mobile gear fisheries, related to the loss and alteration of fishing grounds during the construction, operational and decommissioning |

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| | operational period, including that caused by the future implementation of any safety zones, has been mitigated where reasonably possible. | phases. However, embedded measures have been integral to reducing the effects of the Proposed Project on commercial fisheries. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. They are summarised in Sections 8.8 and 8.10 of **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries**. One of these measures included in **Application Document 7.5.3.2 Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** is to maintain a FLO and fisheries working group(s) throughout the construction phase 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. Therefore, with appropriate mitigation measures it is considered that the effects of the Proposed Project on fishing grounds and activities are not significant |
| 3.8.324 | Where an offshore wind farm or offshore transmission could affect a species of fish that is of commercial interest, but is also of ecological value, the Secretary of State should refer to Section 2.8.147 following of this NPS with regard to the latter. | **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** and **Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals** assess impacts to biodiversity from the Offshore Scheme including the cable route. These chapters concludes that no significant effects to marine biodiversity are anticipated as a result of the Proposed Project. |

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| 2.8.325 | The Secretary of State should be satisfied that any proposed offshore wind farm and/ or offshore transmission project has appropriately considered and mitigated for any impacts to the historic environment, including both known heritage assets, and discoveries that may be made during the course of development. | National Grid has undertaken an iterative design process which responds to policy requirements, and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on heritage and archaeological assets<br><br>**Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely significant marine archaeological effects that could result from the Proposed Project. This chapter is supported by **Application Document 6.3.4.6.A Part 4 Marine Appendix 4.6.A Marine Archaeological Technical Report**, which outlines known and potential marine heritage assets within the study area (comprising a 100 m buffer around the extent of the Offshore Scheme's Order Limits) and assesses the significance and sensitivity of known and potential marine heritage assets.<br><br>The assessment presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology** concludes that, with the implementation of mitigation measures (summarised in sections 6.7 and 6.10 of the chapter), the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial (not significant). Details regarding conservation are presented in section 1.11 **Application Document 7.5.5 Outline WSI**. The Outline WSI will also cover |

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| | | discoveries that may be made during the course of development. |
| 2.8.331 | The Secretary of State should be satisfied that risk to navigational safety is as low as reasonably practicable (ALARP). It is government policy that wind farms and all types of offshore transmission should not be consented where they would pose unacceptable risks to navigational safety after mitigation measures have been adopted. | Embedded measures have been integral in reducing the adverse effects of the Proposed Project on shipping and navigation. These include commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** Following the implementation of the above embedded mitigation measures, risks to navigational safety will be reduced to tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily as detailed in **Application Document**.**6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** |
| 2.8.333 | In view of the level of need for energy infrastructure, where an adverse effect on the users of recreational craft has been identified, and where no reasonable mitigation is feasible, the Secretary of State should weigh the harm caused with the benefits of the scheme. | **Application Document 6.2.4.10 Other Sea Users** concludes that there will be no significant adverse effects on the users of recreational craft. |
| 2.8.347 | Where a proposed development is likely to affect the future viability or safety of an existing or approved/licensed offshore infrastructure or activity, the Secretary of State should give these adverse effects substantial weight in its decision-making. | **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter Cumulative Effects** provides a four-stage assessment of how the surrounding development affects the different marine receptors assessed within the ES. The CEA concludes with a further preliminary assessment which considers the overall cumulative effect of the Proposed Project and all other developments together, on shared marine receptors. The assessment concludes that with |

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| | | appropriate mitigation, the Proposed Project will not adversely affect surrounding development, nor adversely impact marine receptors. |

# Appendix Table A.3 National Policy Statement for Electricity Networks Infrastructure (EN-5)

| Paragraph | Policy Requirement | Compliance with Policy |
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| ***1.6 Infrastructure covered by this NPS*** | | |
| 1.6.2 | This NPS covers above ground electricity lines:<br>i. whose nominal voltage is expected to be 132kV or above (other than a 132kV line associated with the construction or extension of a devolved Welsh generating station);<br>ii. whose length is greater than 2km;<br>iii. that are not a replacement line falling within Section 16(3)(ab) of the 2008Act; and<br>iv. that are not otherwise exempted for reasons set out in Sections 16(3)(b) and (c), (3A) and (3B) of the 2008 Act | Policies 1.6.2 and 1.6.4 confirm that NPS EN-5 applies to the Proposed Project. |
| 1.6.4 | In addition, this NPS will apply to other kinds of electricity networks infrastructure including offshore transmission of any type (defined at section 2.12.4), underground cables at any voltage, associated infrastructure as referred to above and lower voltage overhead lines, where that infrastructure becomes subject to the 2008 Act in the following circumstances:<br>i. if it constitutes associated development for which consent is sought along with an NSIP such as an offshore wind generating station or relevant overhead line; or<br>ii if the Secretary of State gives a direction under Section 35 of the 2008 Act (for developments which, when completed, will be wholly in one or more of the areas specified in subsection 35(3)) that it should be | |

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| | treated as an NSIP and requires a development consent order (DCO). | |
| ***2.1 Introduction*** | | |
| *2.1.4* | Decommissioning of electricity networks is not specifically covered in this NPS. Generally, nationally significant electricity networks are likely to have an ongoing function, but will be subject to maintenance, reinforcement works and for assets to be replaced when they come to the end of their lifespan. | There are no plans to decommission the Proposed Project. Whilst most elements of the Proposed Project have lifespans of approximately 40 years (with the exception of pylons which have a typical lifespan of up to 80 years), these lifespans are likely to be extended given the anticipated increase in electricity demand in the future. The design life of the Proposed Project could be extended with regular maintenance and refurbishment of each component.<br><br>In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning would be submitted for approval to the relevant planning authority at least six months prior to any decommissioning works, as set out in Requirement 13 in Schedule 3 of **Application Document 3.1 Draft Development Consent Order**. |
| ***2.2 Factors influencing site selection and design*** | | |
| 2.2.2 | Siting is determined by:<br><br>• the location of new generating stations or other infrastructure requiring connection to the network, and/or<br><br>• system capacity and resilience requirements determined by the Electricity System Operator. | **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project and explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are summarised in |

| Paragraph | Policy Requirement | Compliance with Policy |
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| | | **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br><br>The main search parameter for the converter station site option areas was that they should be within approximately 5 km of the network connection point as a distance greater than this would trigger the need for reactive compensation equipment on the network resulting in additional land take and cost.<br><br>Once the landfall areas of search and converter station site option areas had been identified, terrestrial route corridors between the Suffolk Onshore Scheme and Kent Onshore Scheme were developed. |
| 2.2.3 | These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date. | Offshore wind energy has an important role to play in delivering this strategy, and a significant step change is required to deliver up to 50 GW of offshore wind energy by 2030, given the current capacity is around 13 GW. Energy networks will be a critical enabler for the clean energy transition; however, the scale and pace of investment needed to meet the UK's decarbonisation targets are significant. National Grid sits at the heart of Britain's energy system, connecting millions of people and businesses to the energy they use every day. Overall, National Grid will be investing around £15bn in the UK over 5 years to upgrade our networks and support the UK's net zero ambition. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations. National Grid's infrastructure projects across England and |

Wales are helping to connect more renewable energy to homes and businesses.

Multiple significant reinforcements are needed to the transmission system up and down the east coast:

- to facilitate the connection of future sources of renewable and low carbon power generation along the coast, such as offshore wind farms, nuclear power, and interconnectors;
- to enable the transport of all this new proposed power from where it is produced to where it is needed, to centres of demand; and
- to meet security of supply quality standards and ensure we can continue to play our part in connecting millions of people reliably to the energy they need every day.

The growth in offshore wind, nuclear generation, and interconnector capacities in East Anglia greatly increase the power transfer requirements out of the region as local total generation will exceed local demand. The existing high voltage electricity network in East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected while meeting the Security and Quality of Supply Standard (SQSS). Several network reinforcement projects are planned to address the shortfall of which the Proposed Project is one.

As more energy is pulled across London and into Kent, power flows across the South East of England are set to increase. Demand for electricity will grow; interconnectors will exchange more energy with European countries to help balance intermittent sources of power. As a result,

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| | | the electricity transmission network in the South East will need to be reinforced to ensure it is able to continue operating safely and securely. |
| 2.2.5 | Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone. | National Grid adopted a staged approach to identify corridors and preliminary routeing and siting options for the Proposed Project, considering environmental and socioeconomic factors, as well as technical engineering design considerations and costs.<br><br>The approach was used to identify 'on-balance' preferences for landfalls, converter station sites and potential route corridors within which preliminary alignments could be developed.<br><br>The steps taken in this approach are set out in Section 4 of **Application Document 7.3 Design Development Report**. |
| 2.2.7 | The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route. | |
| 2.2.9 | In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. | Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Proposed Project. Landscape and visual matters were considered in the early stages of siting and design. **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project. It explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows |

| Paragraph | Policy Requirement | Compliance with Policy |
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| | | that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br><br>Relevant embedded measures are set out in **Application Document 7.5.3.2 CEMP Appendix B REAC**. This includes the preparation of **Application Document 7.5.7.1 Outline LEMP – Suffolk** and **Application Document 7.5.7.2 Outline LEMP– Kent**. |
| 2.2.10 | As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*" | As set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**, the Proposed Project has been designed, as far as practicable following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Proposed Project.<br><br>**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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme as well as **Application Document 6.6 Report to Inform HRA** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas. |

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| | | The landscape and visual impacts of the Proposed Project are assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual.** Throughout the design process measures have been taken to reduce the landscape and visual effects of the Proposed Project as far as practicable.<br><br>A full assessment of the potential impacts of the Offshore Scheme on marine heritage assets is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology.**<br><br>**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** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project.<br><br>No designated geological sites lie within the study area and therefore the Onshore Scheme's will not affect sites of geological importance.<br><br>Therefore, the Proposed Project preserves as far as practicable, environmental and historic sites and features following the mitigation hierarchy as well additional mitigation measure in accordance with policy 2.2.10. |
| *2.2.11* | Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act | The Proposed Project will include an area of land (circa 6 ha) to the south of the A1094 within the Order Limits for delivering acid grassland enhancement to the AONB. This enhancement targets the Natural Beauty and some of the Special Qualities indicators of the AONB and contributes to aspirations set out in the Suffolk Heaths and Coast |

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| | 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023. | AONB Management Plan and will therefore further the statutory purposes of the AONB. It is considered that this measure, which seeks to further the purposes of the designation, is sufficient, appropriate and proportionate. Through the delivery of the acid grassland enhancement, it is considered that National Grid fulfills its statutory duty to seek to further the purpose of conserving and enhancing the natural beauty of the AONB, as set out in Section 85 of the Countryside and Rights of Way act 2000, as well as its statutory duty under Schedule 9 of the Electricity Act 1989.<br><br>The provision of the Acid Grassland is secured through **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** which is secured through Requirement 6 of **Application Document 3.1 Draft DCO**.<br><br>**Application Document 7.5.9.1 Outline Public Rights of Way Management Plan** has been produced to mitigate the impacts of the Proposed Project on PRoW and the approved King Charles III England Coast Path (categorised as a national trail). |
| ***2.3 Climate change adaption and resilience*** | | |
| 2.3.1 | Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change. | **Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** presents an assessment of the likely significant effects of the Proposed Project on the climate and climate change effects that affect the Proposed Project and surrounding environment. The assessment give consideration to how the Proposed project has been designed to be resilient to the matters set out in Paragraph 2.3.2 |
| 2.3.2 | As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed | |

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| | development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:<br>• flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change;<br>• the effects of wind and storms on overhead lines;<br>• higher average temperatures leading to increased transmission losses;<br>• earth movement or subsidence caused by flooding or drought (for underground cables); and<br>• coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively. | Section 6.4 of **the Planning Statement** explains the embedded measures which have been integral in reducing, and where possible avoiding, the climate change effects of the Proposed Project.<br>National Grid has considered the impacts on climate change on the Proposed Project during the construction and operation and maintenance phases. The Climate Change Resilience Assessment presented **in Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** uses historical data obtained from the Met Office and the most recent climate change projections for the UK (UK Climate Projections 2018, Met Office) to assess the likelihood, magnitude and significance of a range of climate change risks, including increased winter precipitation (leading to flooding of site access routes during construction or flooding of onshore facilities during operation) and long-term sea level rise during operation (creating increased occurrences of coastal flooding, sea inundation and coastal erosion at onshore facilities near the coast). |
| 2.3.3 | Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. Consideration should also be given to coastal change (see sections 5.6 in EN1). | |
| ***2.4 Good design*** | | |
| 2.4.1 | The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design. | Section 6.3 of the Planning Statement explains how the Proposed Project complies with the criteria for good design set out in EN-1 and summarises the Proposed Project's design and site selection process. This is also covered within the following is documented in detail in the following reports: |
| 2.4.2 | Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects. | |

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| 2.4.3 | The Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure. | • **Application Document 7.2 Strategic Options Back Check Report:** this report sets out why the Proposed Project is needed and what strategic options were considered to meet the identified need case.<br>• **Application Document 8.1 Historic Report 1 (CPRSS)**: this report explains how the routeing and siting of the Proposed Project was undertaken (following the selection of the strategic option) and the reasons for the selection of the emerging preferences which were consulted upon during non-statutory consultation.<br>• **Application Document 8.2 Historic Report 2 (Option Selection and Design Evolution Report):** this report explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation.<br>• **Application Document 7.3 Design Development Report**: this report summarises the key design decisions from the two historical reports above and sets out how the design of the Proposed Project evolved from statutory consultation to the Proposed Project as applied for, taking into account feedback received from stakeholders.<br>• **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**: this ES chapter provides an overview of the main alternatives considered at |

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| | | each stage of the design development (from strategic options to the proposal as applied for).<br><br>**Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** this ES chapter provides a detailed summary of the routeing and siting appraisal relevant to the evolution of the Offshore Scheme from the identification of the strategic option to the definition of the Offshore Scheme Boundary.<br><br>The above documents provide details of how the design process was conducted and how the design has evolved. They demonstrate how the Proposed Project has undergone an iterative design process led by the early consideration of environmental and planning constraints to avoid and minimise impacts. |
| ***2.5 Environmental and Biodiversity Net Gain*** | | |
| 2.5.1 | 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 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:<br><br>i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or<br><br>ii. connect people to the environment, for instance via footpaths and cycleways | As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report,** National Grid is committed to the delivery of 10% BNG for the Proposed Project and will seek to provide the BNG in three broad ways:<br><br>• On land in National Grid's ownership, including on-site around the proposed converter stations in locations where it would not be disturbed by future development or maintenance activities;<br><br>• Through purchase of biodiversity units from commercial registered provides; and<br><br>• Through collaborative delivery off-site with trusted partner. |

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| | | constructed in tandem with environmental enhancements. | **Application Document 7.5.7.1 oLEMP – Suffollk and Application Document 7.5.7.2 oLEMP – Kent** set out National Grid's commitment to 10% BNG Detailed Landscape and Ecological Management Plans which must be substantially in accordance with the outline plans will be prepared post consent and these are secured by Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1**). It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. |
| ***2.6 Land rights and land interests*** | | | |
| 2.6.1 | i. | In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: own the land on, over, or under which the relevant activity is to take place; or | The land affected by the Proposed Project which captures the land interests is located between Saxmundham and Aldeburgh and between Minster and Pegwell Bay in the counties of Suffolk and Kent respectively. As stated in the **Compulsory Acquisition Information 4.2 Statement of Reasons**, National Grid is not seeking to compulsorily acquire the full extent of the land that falls within the order limits. National Grid is seeking temporary powers over an area greater than that proposed for permanent acquisition or acquisition of rights, which is identified through the Class of Rights shown on the Land Plans (**Application Document 2.3.1 Land Plans - Suffolk** and **Application Document 2.3.2 Land Plans - Kent**). Once the proposed project is constructed and in respect of the overhead line and underground cable sections of the proposed project, National Grid would only require permanent rights to operate, access and maintain the development over a corridor within the LoD. If the proposed project has been |
| | ii. | hold sufficient rights over or interests in that land (typically in the form of an easement); or | |
| | iii. | have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave). | |
| 2.6.2 | Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary | | |

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| | agreement giving it sufficient rights and/or permissions to undertake the relevant work. | unable to secure the permanent land or rights acquisition required via a voluntary agreement, it would rely on exercising powers of compulsory acquisition to secure such land or rights on a permanent basis. |
| *2.6.3* | As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO. | National Grid has attempted and will continue to demonstrate ongoing commitment to acquire all interests in the land through private land agreements but at this stage it has not been possible to acquire all necessary land and rights. It is necessary to seek powers of compulsory acquisition in the draft DCO application in order to ensure that, in the event that the ongoing negotiations to acquire land by agreement are ultimately unsuccessful in relation to any part of the land, the Proposed Project is not precluded from being delivered. National Grid is satisfied that all of the land interests identified for compulsory acquisition are required to enable the Proposed Project to proceed.<br><br>Further details on land interests in relation to the Proposed Project are set out in Section 6 of **Compulsory Acquisition Information 4.2 Statement of Reasons**. |
| ***2.8 Strategic Network Planning*** | | |
| 2.8.1 | A more strategic approach to network planning will ensure that network development keeps pace with renewable generation and anticipates future system needs. Strategic network planning, such as through the Holistic Network Design and its follow up exercises or through forthcoming Centralised Strategic Network plans, helps reduce the overall impact of infrastructure by identifying opportunities for coordination, where appropriate, and taking a holistic view of both the onshore and offshore network. Network plans will take | **Application Document 7.10 Coordination Document** presents how the Proposed Project has considered and evaluated coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts to the local environment and host communities. The Document also responds to feedback from local stakeholders in Suffolk and Kent at the non-statutory and statutory consultation stages requesting the Proposed Project coordinates more closely with other large-scale terrestrial and marine electricity transmission projects |

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| | account of environmental and community impacts, alongside deliverability and economic cost, from the outset. | currently proposed or consented proximate to the Proposed Project**.** |
| 2.8.4 | The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. | |
| 2.8.7 | Where it can be demonstrated that such a set of works will reinforce the network as a whole, or reinforce the network to accommodate a subset of new connections, the Secretary of State should be willing – in line with the need statement set out in Section 3.3 of EN-1 – to accept an application seeking development consent for the entire set of works. | 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 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. As such, the Proposed Project is in accordance with this policy. |
| ***2.9 Applicant assessment*** | | |
| 2.9.4 | Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in paragraphs 2.10.3 and 2.10.4. | No new section of overhead line is being delivered as part of the Suffolk Onshore Scheme. The only overhead line works involved are modifications to an existing overhead line. Therefore, no new collision risk is introduced by the Suffolk Onshore Scheme.<br>A new section of overhead line is proposed as part of the Kent Onshore Scheme. **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** |

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| | | provides a collision risk assessment which has concluded no significant mortality would occur even without the use of bird deflectors. Nonetheless, bird deflectors will be incorporated into the new section of overhead line and discussion with project ornithologists has identified that in the context of the Proposed Project and the species involved, that hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions. |
| 2.9.6 | Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations. | The collision risk assessment (**Application Document 6.2.3.2.F Appendix 3.2.F Vantage Point Survey Report incorporating OHL Mortality Monitoring Report and Collision Risk Assessment)** particularly (but not exclusively) considered features of sites that form part of the National Sites Network.<br><br>Section 2.9 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity,** provides an assessment of avian collision risk. The assessment concludes that the species predicted to be transiting through an 'at-risk zone' in the greatest numbers are cormorant, greylag goose and mallard. None of these are species for which either Thanet Coast & Sandwich Bay SPA or Stodmarsh SPA/Ramsar are designated. For the majority of the species considered, when applying a standard avoidance rate of 99.9%, which is supported by the results of corpse searches along the existing overhead line, this results in fewer than one individual potentially colliding with the proposed overhead line annually.<br><br>No new section of overhead line is being delivered as part of the Suffolk Onshore Scheme. The only overhead line works involved are modifications to an existing overhead |

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| | | line. Therefore, no new collision risk is introduced by the Suffolk Onshore Scheme. |
| 2.9.7 | While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts. | The choice of an OHL for the HVAC connection in Kent, as opposed to an underground cable, is explained in **Application Document 7.3 Design Development Report**. Although the OHL option has a greater potential for permanent impacts on landscape character, the setting of historical assets and bird collision risk, the underground option would require a permanent compound within Flood Zones 2 and 3, would have more potential for physical impacts of non-designated heritage assets and would lead to more permanent habitat loss. |
| 2.9.14 | Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – re-routing, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the position on nationally designated landscapes at section 2.9.20. | The landscape and visual impacts of the Proposed Project are assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Landscape and Visual.** Throughout the design process measures have been taken to reduce the landscape and visual effects of the Proposed Project as far as practicable. These measures are outlined in sections 1.7 and 1.9 of the ES Chapters, as well as the Outline Landscape and Ecological Management Plans **(Application Document 7.5.7.1 and 7.5.7.2).**<br>There is the potential for a significant total cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1, which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, |

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| | | thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.<br><br>Whilst the Proposed Project will result in some significant adverse impacts during construction and operation, the landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed landscape visual effects wherever possible. As a result, no additional mitigation measures have been identified in addition to the embedded measures. |
| 2.9.16 | The Holford Rules – guidelines for the routing of new overhead lines – were originally set out in 1959. These guidelines, intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead lines. | Consideration of design for the Proposed Project, in accordance with the Holford and Horlock rules, is demonstrated in **Application Document 7.3 Design Development Report**. Specific environmental considerations are addressed in the relevant ES Topic Chapters. |
| 2.9.17 | In brief, the Holford Rules state that applicants should:<br><br>• avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence;<br><br>• avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the bigger structures which are used when lines change direction; | |

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| | • other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers;<br><br>• choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees;<br><br>• prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees;<br><br>• where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or 'wirescape'; and<br><br>• approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding. | |
| 2.9.18 | The Horlock Rules – guidelines for the design and siting of substations – were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants' proposals for the infrastructure associated with new overhead lines. | |

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| 2.9.19 | In brief, the Horlock Rules state that applicants should:<br><br>• consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum.<br><br>• seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections.<br><br>• protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.<br><br>• take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum.<br><br>• keep the visual, noise and other environmental effects to a reasonably practicable minimum.<br><br>• consider the land use effects of the proposal when planning the siting of substations or extensions.<br><br>• consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum.<br><br>• use space effectively to limit the area required for development consistent with appropriate mitigation | |

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| | measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation.<br><br>• make the design of access roads, perimeter fencing, earth-shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings.<br><br>• in open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance.<br><br>• study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines. | |
| 2.9.20 | Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty). | No overhead lines are proposed within the Suffolk Heaths and Coast AONB.<br><br>The Kent Onshore Scheme comprises an HVAC connection from the existing Richborough to Canterbury 400 kV OHL to the proposed Minster Substation via a new overhead approximately 3.5 km long (of which 2.2 km would be replacement of existing Richborough to Canterbury connection). The choice of an OHL for the HVAC connection in Kent, as opposed to an underground cable, is explained in **Application Document 7.3 Design Development Report**. Although the OHL option has a greater potential for permanent impacts on landscape |
| 2.9.21 | In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by rerouting overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line. | |

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| 2.9.22 | However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme. | character, the setting of historical assets and bird collision risk, the underground option would require a permanent compound within Flood Zones 2 and 3, would have more potential for physical impacts on non-designated heritage assets and would lead to more permanent habitat loss. This accords with paragraph 2.9.20 of NPS EN-5. It is also made clear in paragraph 2.9.7 that the development of new OHLs is not incompatible with applicants' statutory duties under Schedule 9 of the Electricity Act. |
| 2.9.23 | Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling. | As summarised in **Application Document 7.3 Design Development Report,** four strategic options that might address the network reinforcement needs were identified and appraised at a strategic level:<br>• SL1 – Sizewell area and Sellindge area subsea approx. 180 km;<br>• SL2 – Sizewell area and Richborough area subsea approx.120 km;<br>• SL3 – Sizewell area and Canterbury area subsea approx. 120 km; and<br>• LL1 – Sizewell area and Canterbury area onshore approx. 220 km<br>Two technology options were considered for the three offshore options: HVAC subsea cable and HVDC subsea cable. Four technology options were considered for the onshore option: OHL, underground cables, Gas Insulated Lines (GIL) and onshore HVDC. |
| 2.9.24 | In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against:<br>• the adverse implications of the overhead line proposal;<br>• the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and<br>• the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea | |

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| | cabling of proximate existing or proposed electricity networks infrastructure | These appraisals considered the likely environmental and socio-economic effects, technical issues and costs associated with each strategic option. The network performance of each strategic option was also modelled to determine the benefits. The appraisal and modelling results informed judgements regarding the relative merits of the options and ensured that the final Strategic Proposal would meet National Grid's statutory duties under the Electricity Act, including the requirement to bring forward proposals that are efficient, co-ordinated and economical, have regard to the desirability of preserving amenity, and that would comply with the relevant planning policies.<br><br>The assessment of the four options concluded the following:<br><br>• Option LL1 (Sizewell to Canterbury area onshore) would have the lowest capital cost connection, but with a higher lifetime cost than the offshore HVDC solutions. Option LL1 would be subject to increased costs for crossing of the River Thames (likely by tunnel) and for any underground cable sections.<br><br>• None of the environmental and socio-economic impacts of the remaining offshore options (SL1, SL2 and SL3) were considered to be issues that could not be mitigated with careful consideration of routeing and use of appropriate technologies to overcome specific constraints, as is consistent with the National Policy Statements (NPSs).<br><br>• The lowest cost subsea option was equal between options SL2 and SL3 (a connection from Sizewell |
| 2.9.25 | In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:<br><br>• the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations;<br><br>• the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;<br><br>• the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an | |

overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);

- the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment;
- the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the

Area to Richborough area or Canterbury area over a distance of 145 km via a 2000 MW Voltage Source Converter (VSC) HVDC connection).

- From an environmental and socio-economic perspective, option SL2 was preferred over option SL3 due to the marine constraints off the north Kent coast and onshore siting opportunities close to the existing overhead line at Richborough.

Accordingly, the assessment concuded that option SL2 HVDC would best balance the overall technical, cost, environmental and socio-economic considerations. The strategic proposals considered and the reasons for the selection of the preferred strategic option are set out in further details in **Application Document 7.2 Strategic Options Backcheck Report**.

During the routeing and siting selection process, due to the existing and proposed energy development within the study area coupled with the proximity of the Suffolk Coast and Heaths AONB in this locality, the environmental and socio-economic appraisal concluded that an underground HVAC connection would be preferred to an overhead line connection between the converter site option areas and any of the connection points (**Application Document 8.2 Historic Report (Option Selection and Design Evolution Report**).

The site selection process and consideration of alternatives are summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**, which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees

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| | Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites. | received from formal consultation exercises and project meetings.<br>Landscape and visual impacts are considered in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**.<br>Community impacts are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism.**<br>Impacts on habitats 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 5 Marine Mammals, Application Document 6.2.4.5 Part 4 Marine Chapter 6 Ornithology, Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and A**pplication Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity.**<br>Impacts on archaeological and heritage assets are considered in A**pplication Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology, Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage a**nd **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage**.<br>Geology and Hydrology impacts are considered in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology**. |

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| | | Impacts on soils and agricultural land are considered in **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**.<br><br>Impacts from cable protection 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 Ecology, Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals and Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries.** |
| 2.9.39 | For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory. | **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme and Kent Onshore Scheme respectively. It is concluded the Proposed Project accords with noise related policies regarding substations and overhead lines. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Kent Onshore Scheme as levels of noise are likely to be low. |
| 2.9.40 | For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors. | **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Chapter 9 Noise and Vibration** state that operational noise from overhead lines is scoped out of the ES. |

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| 2.9.46 | All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms | As set out in the Scoping Report (AECOM, 2022) (**Application Document 6.14 Environmental Scoping Report 2022**) and agreed in the Scoping Opinion received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**) EMF is unlikely to have significant environmental effects and was therefore scoped out of the EIA.<br>The design of the Proposed Project is compliant with the International Commission on Non-Ionizing Radiation Protection guidelines (1998) in ensuring that the threshold for impacts to humans is not met or exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public electric and magnetic fields (EMF) exposure limits. |
| 2.9.48 | To prevent these known effects, he International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, 'basic restrictions', and in terms of measurable 'reference levels' of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling. | |
| 2.9.64 | Where applicants propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors. | 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 |
| ***2.10 Mitigation*** | | |
| 2.10.2 | Careful siting of a line away from, or parallel to, but not across, known flight paths can reduce the numbers of birds colliding with overhead lines considerably. | No new section of overhead line is being delivered as part of the Suffolk Onshore Scheme. The only overhead line works involved are modifications to an existing overhead line. Therefore, no new collision risk is introduced by the Suffolk Onshore Scheme. |

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| | | The alignment of the overhead line was considered in developing the Kent Onshore Scheme. It was ultimately determined that a much longer overhead line connection to the north would have a more detrimental effect environmentally (considering all topics, not just ecology) than the short section across the River Stour. Opportunities for buried cables under the River Stour were also considered but engineering issues partly related to the high water table rendered that less favourable than an overhead line connection. A full discussion of alternatives for the new section of overhead line is provided in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**. |
| 2.10.3 | Making lines more visible by methods such as the fitting of bird flappers and diverters to the earth wire, which swivel in the wind, glow in the dark and use fluorescent colours designed specifically for bird vision can also reduce the number of deaths. The design and colour of the diverters will be specific to the conditions – the line and pylon/transmission tower specifications and the species at risk. | **Application Document 6.2.3.2.F Appendix 3.2.F Vantage Point Survey Report incorporating OHL Mortality Monitoring Report and Collision Risk Assessment** and Section 2.9 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** has provided a collision risk assessment which has concluded no significant mortality would occur even without the use of bird deflectors. Nonetheless, bird deflectors will be incorporated into the new section of overhead line and discussion with project ornithologists has identified that in the context of the Proposed Project and the species involved, that hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions. |
| 2.10.4 | Electrocution risks can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines so | The key birds perching will be peregrine and corvids. However, the line spacing is sufficient that even for a large wingspan bird they shouldn’t be touching two wires. |

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| | that birds find no opportunity to perch near energised power lines on which they might electrocute themselves. | |
| 2.10.5 | In addition to good design in accordance with the Holford and Horlock rules (please see paragraphs 2.9.16 - 2.9.19), and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are:<br>• consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line;<br>• selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring that towers are of the smallest possible footprint and internal volume; and<br>• the rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development. | Consideration of design for the Proposed Project, in accordance with the Holford and Horlock rules, is demonstrated in **Application Document 7.3 Design Development Report**.<br>Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Proposed Project. Landscape and visual matters were considered in the early stages of siting and design. **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project. It explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br>Relevant embedded measures are set out in **Application Document 7.5.3.2 CEMP Appendix B REAC**. This includes the preparation of **Application Document** |

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| | | **7.5.7.1 Outline LEMP – Suffolk** and **Application Document 7.5.7.2 Outline LEMP – Kent**.<br><br>New steel lattice pylons have been chosen as the preferred option to support the conductors (rather than T-pylons). Lattice pylons offer the advantage of thin steel members in in an open structure, making background features visible beyond, helping them to visually recede. Further technical characteristics of the proposed HVAC connection for the Kent Onshore Scheme are discussed in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** |
| 2.10.6 | Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO requirements if appropriate, as follows:<br><br>• landscape schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority may also be needed; and<br><br>• screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor. | Embedded mitigation is highlighted in both the Suffolk and Kent assessments, with the landscaping proposals incorporated into the development design to address landscape and visual impacts. Measures that have been incorporated are:<br><br>• sensitive routeing and siting of infrastructure and temporary works; and<br><br>• relevant embedded measures set out within Application **Document 7.5.3.2 CEMP Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>• the design of the Saxmundham Converter Station, in terms of the building form and the external materials, reflected in the Design Principles presented in **Application Document 7.12.1 Design Principles - Suffolk**. The Design Principles provide guidance regarding the design intent and design principles that would be adopted and embedded into the |

detailed proposals of this structure. These would include:

- locating the Saxmundham Converter Station as far as practicable within the southern extent of the site, away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact;
- consideration of the orientation and massing of the Saxmundham Converter Station in order that existing landscape features can be retained and enhanced (woodland, hedgerow planting); and
- designing and arranging the converter station building to be sympathetic to their surroundings and be integrated into the landscaped setting of the site. Buildings will be clad in appropriate material and colours designed to appear recessive within the landscape, to help integrate the building into the landscape and views.

- the design of the Fromus bridge, in relation to its sensitive landscape and historic setting is reflected in **Application Document 7.11.1 Design Approach Document - Suffolk** and **Application Document 7.12.1 Design Principles – Suffolk**;

- the design of the Friston Substation (under Friston Scenario 2), in terms of the building form and materials, is reflected in the Design Principles presented in **Application Document 7.12.1 Design Principles – Suffolk.** The outline landscape mitigation plan which accompanies Friston Scenario 2 (the unlikely scenario National Grid build Friston

Substation using the Sea Link consent) is contained in **Application Document 7.5.7.1 Outline LEMP – Suffolk** and **Application Document 7.5.7.1.5 Friston Substation Outline Landscape Mitigation**, as secured by Requirement 6 of Schedule 3 of Application Document 3.1 draft DCO;

- landscape design opportunities within the AONB: the temporary works within the AONB associated with the landfall and HVDC would be fully reinstated in accordance with Control and Management Measures and further outlined in Application Document 7.5.7.1 Outline LEMP – Suffolk, as secured by Requirement 6 of Schedule 3 of Application Document 3.1 draft DCO;
- landscape design principles: an outline landscape strategy has been prepared for Saxmundham Converter Station which provides a collaborative approach to delivering landscape and ecological mitigation (Application Document 7.5.7.1 Outline LEMP – Suffolk and Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation, as secured by Requirement 6 of Schedule 3 of Application Document 3.1 draft DCO). The outline mitigation design has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. The principles of the outline landscape strategy seek to:
- integrate the Suffolk Onshore Scheme into the existing landscape pattern as far as practicable by utilising and following existing features, including vegetation;

- replace habitat lost as a result of construction of the Suffolk Onshore Scheme and enhance habitats through the creation of woodland, hedgerow, grassland and riparian habitats;
- protect existing vegetation wherever possible, including the veteran and ancient trees at the River Fromus bridge crossing;
- strengthen the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland planting to provide structural screening to the Saxmundham Converter Station;
- introduce native hedgerow and tree planting along sections of the B1119 to create vegetative layers within the landscape and partially screen views of the Saxmundham Converter Station, whilst maintaining some views of the planted edge of Saxmundham (identified in the Saxmundham Neighbourhood Plan as an important aspect of the setting and in views when approaching along the B1119 from the east);
- increase the green infrastructure opportunities providing permissive access across the Saxmundham Converter Station site and establishing an attractive amenity value for users of the permanent PRoW diversions;
- to provide an integrated drainage solution with attenuation ponds planted with marginal wetland species set within a wider context of native scrub planting to improve the biodiversity value across the site;

- to strengthen areas of existing planting to provide greater biodiversity and screening function around the River Fromus Bridge;
- to establish native woodland planting within the areas previously planted with willow plantation to integrate and partially screen views of the River Fromus Bridge within the valley landscape;
- to integrate the permanent access route within the historic parkland landscape with hedgerow and occasional tree planting;
- to consider opportunities for advanced planting to provide early establishment of woodland planting; and
- monitoring and maintenance of new planting and seeding to ensure successful establishment.
- the design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in response to the Design Approach Document (**Application Document 7.11.2 Design Approach Document – Kent**) and the Design Principles presented in **Application Document 7.12.2 Design Principles - Kent**. The Design Principles provide guidance regarding the design intent and design principles that will be adopted and embedded into the detailed proposals of these structures.
- An outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and biodiversity mitigation as well as BNG (**Application Document 7.5.7.2 Outline LEMP – Kent and Application Document 7.5.7.2.1 Minster**

**Converter Station and Substation Outline Landscape Mitigation**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**). This outline strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. It has been developed as part of the iterative process of design and assessment. The principles of the outline landscape strategy seek to:

- respond to both the immediate landscape pattern of the site as well as the wider landscape character;
- use native woodland planting to provide structural screening to the converter station and substation in views from the north and northwest whilst providing containment to the converter station and substation site so that it appears visually connected to the Richborough Energy Park rather than the wider marsh landscape;
- reinforce the pattern of drainage ditches with appropriate marginal planting and establishing a sensitive interface with the wider marsh landscape;
- provide connectivity with wider blue and green infrastructure networks;
- protect existing vegetation wherever possible;
- consider opportunities for advanced planting to provide early establishment of woodland planting;
- provide an integrated drainage solution with attenuation ponds and swales, planted with marginal wetland species set within a wider context of

marshland and native scrub planting to improve the biodiversity value within the site; and

- monitoring and maintenance of new planting and seeding to ensure successful establishment.

The mitigation measures set out above are supported by and set out in full within the following documents, and where relevant to, are secured by Requirements in Schedule 3 of **Application Document 3.1 draft DCO**:

- **Application Document 6.10 AIA;**
- **Application Document 7.5.3 Outline Onshore CEMP;**
- **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP;**
- **Application Document 7.5.3.2 CEMP Appendix B REAC;**
- **Application Document 7.5.7.1 Outline LEMP – Suffolk;**
- **Application Document 7.12.1 Design Principles – Suffolk.**
- **Application Document 7.5.3 Outline Onshore CEMP;**
- **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP;**
- **Application Document 7.5.3.2 CEMP Appendix B REAC;**

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| | | • **Application Document 7.5.7.2 Outline LEMP – Kent;**<br>• **Application Document 7.11.2 Design Approach Document – Kent; and**<br>• **Application Document 7.12.2 Design Principles – Kent.** |
| 2.10.9 | Applicants must consider the following measures:<br>• the positioning of lines to help mitigate noise;<br>• ensuring that the appropriately sized conductor arrangement is used to minimise potential noise;<br>• quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects;<br>• ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and<br>• the selection of quieter cost-effective plants. | The Proposed Project has been designed, as far as practicable, following the mitigation hierarchy in order to, in the first instance, avoid or reduce noise and vibration impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project. **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Chapter 9 Noise and Vibration** present the assessment of the likely significant noise and vibration effects that could result from the Suffolk and Kent Onshore Scheme respectively. |
| 2.10.11 | The applicant should consider the following factors:<br>• height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002;<br>that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and | As set out in the Scoping Report (AECOM, 2022) (**Application Document 6.14 Environmental Scoping Report 2022**) and agreed in the Scoping Opinion received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**) EMF is unlikely to have significant environmental effects and was therefore scoped out of the EIA.<br>The design of the Proposed Project is compliant with the International Commission on Non-Ionizing Radiation Protection guidelines (1998) in ensuring that the threshold |

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| | • any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines. | for impacts to humans is not met or exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public electric and magnetic fields (EMF) exposure limits. |
| 2.10.14 | The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments. | 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. |
| 2.10.15 | Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place. | |
| ***2.11 Secretary of State decision making*** | | |
| 2.11.1 | Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately. | As set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity**, the Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Proposed Project.<br>**Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Proposed Project in Suffolk. The chapter concludes that no residual long-term significant adverse effects are predicted as a result of the |

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| | | construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for habitats, ornithology and riparian mammals and during the operation phase for habitats, ornithology, dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the site.<br><br>**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Proposed Project in Kent. The chapter concludes that no residual long-term significant adverse effects as predicted as a result of the construction and operation of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the site. |
| 2.11.2 | The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them. | Consideration of design for the Proposed Project, in accordance with the Holford and Horlock rules, is demonstrated in **Application Document 7.3 Design Development Report**. |
| 2.11.3 | The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately. | **Application Document 7.3 Design Development Report** provides an overview of the design rationale for the Proposed Project and explains how the Proposed Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option |

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| | | identification and selection stage up to the refinement of the Proposed Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are summarised in A**pplication Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered,** which shows that a wide range of alternatives were considered in the design of the Proposed Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings. |
| 2.11.5 | Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding. | Impacts to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty are considered in Section 7.3 of **the Planning Statement.**<br><br>**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Suffolk Onshore Scheme. The assessment concludes that there would not be any significant adverse effects on designated landscapes, including the Suffolk Heaths and Coast AONB, arising from the Suffolk Onshore Scheme.<br><br>As set out in Section 1.7 of **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, in line with national policy requirements, the Proposed Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to site the converter station away from the AONB to limit effects on its setting. This results in predominantly temporary direct effects in localised areas of the AONB associated with the HVDC cable laying (such as minor |

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| | | vegetation removal and temporary displacement of agricultural land and acid grassland). Following construction, the temporary works associated with the landfall and HVDC corridor would be fully reinstated in accordance with control and management measures outlined in **Application Document 7.5.7.1 Outline LEMP – Suffolk.**<br><br>The Proposed Project will include an area of land (circa 6 ha) to the south of the A1094 within the Order Limits for delivering acid grassland enhancement to the AONB. As demonstrated in section 7.3 of the Planning Statement, this enhancement targets the Natural Beauty and some of the Special Qualities indicators of the AONB and contributes to aspirations set out in its Management Plan, and will therefore further the statutory purposes of the AONB. No element of the Kent Onshore Scheme is located within an AONB or will have an impact on an AONB and therefore the appraisal of national landscape impacts for the Kent Onshore Scheme is not required. |
| 2.11.7 | The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant. | The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce noise and vibration impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project. **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Chapter 9 Noise and Vibration** present the assessment of the likely significant noise and vibration effects that could result from the Suffolk and Kent Onshore Scheme respectively. |
| 2.11.8 | Noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable. | |

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| 2.11.9 | This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council Recommendation on EMF exposure. | As set out in the Scoping Report (AECOM, 2022) (**Application Document 6.14 Environmental Scoping Report 2022**) and agreed in the Scoping Opinion received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**) EMF is unlikely to have significant environmental effects and was therefore scoped out of the EIA. The design of the Proposed Project is compliant with the International Commission on Non-Ionizing Radiation Protection guidelines (1998) in ensuring that the threshold for impacts to humans is not met or exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public electric and magnetic fields (EMF) exposure limits. |
| 2.11.10 | Before granting consent to an overhead line application, the Secretary of State should be satisfied that the proposal is in accordance with the guidelines, considering the evidence provided by the applicant and any other relevant evidence. It may also need to take expert advice from the Department of Health and Social Care | |
| 2.11.11 | Industry currently applies optimal phasing to 275kV and 400kV overhead lines voluntarily wherever operationally possible, which helps to minimise the effects of EMF. The government has developed with industry a voluntary Code of Practice, 'Optimum Phasing of high voltage double-circuit Power Lines – A Voluntary Code of Practice'30, published in March 2012, that defines the circumstances where industry can and will optimally phase lines with a voltage of 132kV and above. | |
| 2.11.12 | Where the applicant cannot demonstrate that the line will be compliant with the Electricity Safety, Quality and Continuity Regulations 2002, with the exposure guidelines as specified in the Code of Practice on compliance, and with the policy on phasing as specified | |

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| | in the Code of Practice on optimal phasing then the Secretary of State should not grant consent. | |
| 2.11.17 | The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either:<br>i. that the development will not use SF6; or<br>ii. (a) that there is no proven commercially available alternative to the use of SF6; and<br>(b)that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and<br>(c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place. | It is proposed 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. |
| ***2.12 Special assessment principles for offshore-onshore transmission*** | | |
| 2.12.4 | As identified in EN-1, it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning and development of the onshore transmission network than previously. This includes all types of offshore transmission including interconnectors, multi-purpose interconnectors (MPIs) and subsea 'onshore' transmission or 'bootstraps' reinforcing the onshore transmission network. Further details on the different types of offshore transmission are provided in the Glossary. | The approach to coordination and assessment of impacts is evidenced in **Application Document 7.10 Coordination Document** and within the **Planning Statement**.<br>National Grid has coordinated with other projects at the project development stage for the Offshore element of the Proposed Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an |
| 2.12.6 | In addition, a more co-ordinated approach to designing offshore transmission is expected to be adopted compared with the previous standard approach of radial routes to shore. This applies to spatially close groups of | |

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| | offshore windfarms, subsea 'onshore' transmission or bootstraps, interconnectors and multi-purpose interconnectors. | offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these projects to be delivered has limited the ability of the Proposed Project to coordinate offshore but it has nonetheless been considered. Further details on this process are available in **Application Document 7.10 Coordination Document.** |
| 2.12.7 | As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises, see Section 2.13 below. | The Proposed Project is considered a CNP infrastructure project in line with NPS EN-1, EN-3 and EN-5. |
| ***2.13 Offshore-onshore transmission: Applicant assessment*** | | |
| 2.13.4 | It is recognised that proposed projects which have progressed through strategic network design exercises have been considered for strategic co-ordination through those exercises. However, any opportunities for subsequent local co-ordination between projects, irrespective of whether they have been through those exercise, should be considered in project development. This is in addition to considerations on co-ordinating delivery in construction. | Section 6 of **Application Document 7.10 Coordination Document** explains the approach National Grid has taken to coordination during the development of the Sea Link project, including throughout the options identification and selection stages, and the development of the defined proposal.<br><br>Geographically proximate projects have been considered in terms of coordination for the Suffolk Onshore Scheme, Kent Onshore Scheme and Offshore Scheme.<br><br>For the Suffolk Onshore Scheme the principle of co-location has identified landfalls, cable routes, and converter station sites that allow opportunities to co-locate |

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| | | with other projects, namely NGV's LionLink and at the time of project development, Nautilus. While subsequent design decisions by the NGV projects have meant that the colocation may not be the most appropriate approach for elements of the projects, this has nonetheless been considered.<br><br>In Kent, opportunities to co-locate with other proposed projects surrounding the Richborough Substation for the HVAC connection were considered; however, colocation was not considered possible. |
| 2.13.5 | In addition, it is recognised that the HND and subsequent network design exercises, may on occasion, identify a radial solution, i.e. a direct route from an offshore wind farm to shore, not proposed to coordinate with another project at the time of network design. | National Grid has coordinated with other projects at the project development stage for the Offshore element of the Proposed Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these projects to be delivered has limited the ability of the Proposed Project to coordinate offshore but it has nonetheless been considered. Further details on this process are available |
| 2.13.9 | Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a coordinated solution is not feasible. For projects which had firm connection agreements in place prior to completion of the HND (formerly known as 'Early Opportunities' projects), co-ordinated design work should be brought forward by applicants. | |

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| | | in **Application Document 7.10 Coordination Document.** |
| 2.13.10 | The identification of co-ordinated solution options, and any radial option, should consider the criteria for designs to be deliverable and operable, economic and efficient, minimise impact on the environment and minimise impact on the local communities. Options should seek to identify the most appropriate balance between these criteria. | **Application Document 7.10 Coordination Document** explains the approach National Grid has taken to coordination during the development of the Sea Link project, including consenting; the options identification and selection stages and the development of the defined proposal; and project delivery.in order to minimise environmental and local community effects of the Proposed Project in combination with other projects following its consent, and in the future.<br><br>Regarding coordination in the approach to consent, National Grid is proposing to achieve this with Scottish Power Renewable's (SPR) existing DCOs for the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) offshore windfarms by delivering the Friston Substation under SPR's DCOs along with connection works required for the Proposed Project under the Sea Link DCO. This is likely to bring project delivery benefits by having a single construction phase and also reduces confusion in the local community regarding the status of the Friston Substation in light of the Proposed Project's application. It is noted that the Sea Link DCO still provides powers to build Friston Substation for the purpose of the Proposed Project however this is in the unlikely event the EA1N and EA2 do not bring forward the delivery of Friston Substation.<br><br>As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to |
| 2.13.11 | The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible. This includes taking account of geographically proximate projects including opportunities to connect wind farms and multi-purpose interconnectors and/or bootstraps with each other that are planned or foreseen in the near future. Evidence should demonstrate that this has been considered in the assessment of options. | |
| 2.13.12 | Applicants bringing forward offshore transmission projects are expected to consider future demand when considering the location and route of their proposals. This may involve consenting offshore platforms, converter stations or substations which facilitate future coordination. | |
| 2.13.14 | Co-ordinated transmission proposals, including multi-purpose interconnectors and other types of offshore transmission (see Glossary), are expected to reduce the overall environmental and community impacts associated with bringing offshore transmission onshore compared to an uncoordinated, radial approach. These reduced | |

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| | impacts could, for example, relate to: fewer landing sites and reduced landfall impacts; reduced overall cable length and impacts; and fewer cable corridors and reduced impacts from these. | explore the feasibility of an offshore coordination between the two offshore windfarms and the Proposed Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these projects to be delivered has limited the ability of the Proposed Project to coordinate offshore but it has nonetheless been considered.<br><br>Coordination in project development has also been demonstrated by National Grid through the process of routing and siting and design development. This has included exploring the concept of co-locating converter stations, sharing cable corridors and landfalls with other projects. This coordination is likely to achieve the following specific benefits.<br><br>• Identifying Friston Substation (part of the SPR windfarms East Anglia ONE North and East Anglia TWO) as the point of connection into the network, reducing additional land take and associated environmental effects if a new substation location had been selected.<br><br>• Reducing the geographic extent of impacts upon local communities and the environment by adopting the principle of co- location during |
| 2.13.16 | For onshore infrastructure, reduced impacts could, for example, relate to fewer or co-located substations and converter stations and transmission lines as well as demonstrating how environmental and community impacts have been avoided as far as possible. | |
| 2.13.17 | Applicants are expected to be able to indicate how co-ordination including reduction in impacts have been considered drawing on work of others, including that led or enabled by National Grid Electricity System Operator (ESO). | |
| 2.13.18 | For those projects not covered by the strategic network planning undertaken by the ESO and which have received a connection agreement, applicants should seek to demonstrate the reduced overall impacts from co-ordination (as identified at section 2.13.14 above) and how the onshore connection locations have been identified. These projects are expected to demonstrate the reductions in environmental and community impact achieved through coordination compared with radial solution | |
| 2.13.19 | There may be exceptional circumstances where multiple coordinated solutions have been explored and all those solutions would lead to adverse impacts… and where these could be avoided through radial connections. In these circumstances radial connections may be more appropriate. Evidence of the co-ordinated solutions assessed, and likely adverse impacts would need to be | |

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| | provided by the applicant to clearly substantiate this. This includes demonstration of consideration of alternative co-ordination solutions which may not be in proximate locations. | the options identification and selection stages of Sea Link, with the NGV projects LionLink and Nautilus resulting in:<br>— A design that takes account of the potential requirements of future projects, including by leaving space north of the landfall, and the HVAC and HVDC cable routes for up to two other projects (depending on their requirements).<br>— Providing sufficiently broad Limits of Deviation (LoD) at the point at which they interact with the landscaping proposed by SPR at the Friston Substation to allow the final micro-siting of the Sea Link HVAC cable ducts to avoid loss of landscaping and therefore avoiding the opening of views to sensitive receptors.<br>— Providing sufficiently broad LoD within parts of the HVAC cable corridor, to afford further flexibility for coordinated micro-siting.<br>— selecting a Converter Station Site that is positioned so that the immediately adjacent sites can accommodate up to two further converter stations which at the time of selection were expected to be LionLink and Nautilus. A masterplan for the Converter Station Site (**Application Document 7.10.1 NGV Coordination Masterplan**) has also been prepared, through discussion with NGV, demonstrating how the Proposed Project can accommodate a |

wider coordinated approach to converter station siting and construction.

For the Kent Onshore Scheme, consideration of coordination in project development has resulted in an HVAC connection that has considered the interaction of the Proposed Project with developments of other energy projects in the vicinity of Richborough Substation. Whilst the colocation of the Proposed Project with other projects surrounding the Richborough Substation was not considered possible, this has nonetheless been considered.

National Grid has examined, and is continuing to examine, options to coordinate with other projects through the project delivery phase. There is still uncertainty regarding project delivery programmes and the siting of converter stations for specific projects however currently it is likely coordination could deliver the following benefits:

- minimising the disruption on local communities and other sensitive receptors by construction of the Friston Substation to connect EA1N, EA2 and the Proposed Project in a single mobilsation with opportunities to share temporary construction areas and accesses;
- minimising the disruption on local communities and other sensitive receptors by potentially reducing the amount of construction phase works that need to be implemented for multiple converter stations by coordinating with NGV; and
- reducing construction phase impacts in the offshore environment and on users by

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| | | continuing to explore opportunities for coordinated project delivery for the Offshore Scheme with RWE's North Falls and Five Estuaries Offshore Windfarms and other in-service cable projects and known planned developments.<br><br>National Grid is also considering the potential use of other offsite infrastructure with EDF given the proximity of Sizewell C and the temporary infrastructure supporting its construction phase. |
| ***2.14 Offshore-onshore transmission: mitigation*** | | |
| 2.14.1 | Adverse impacts on Marine Protected Areas (MPAs) have caused consenting delays, and in some cases a need for compensatory measures under the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Habitats and Species Regulations 2017, or measures of equivalent environmental benefit under the Marine and Coastal Access Act 2009. Therefore, applicants should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process. Applicants should also facilitate delivery of strategic compensation measures where appropriate (see paragraphs 2.8.276 - 2.8.283 of EN-3). | **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 5 Marine Mammals and Application Document 6.2.4.5 Part 4 Marine Chapter 6 Ornithology** assess impacts to biodiversity from the Offshore Scheme as well as **Application Document 6.6 Report to Inform HRA** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas. The mitigation hierarchy for impacts to marine biodiversity has been applied when identifying a marine cable corridor for the Offshore Scheme to avoid key sensitive habitats and Marine Protected Areas.<br><br>The HRA concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, |

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| | | Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC.<br><br>**Application Document 6.11 Marine Conservation Zone Assessment** concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of Proposed Project related activities. |
| 2.14.2 | In the assessments of their designs, applicants should demonstrate:<br><br>• how environmental, community and other impacts have been considered and how adverse impacts have followed the mitigation hierarchy i.e. avoidance, reduction and mitigation of adverse impacts through good design;<br><br>• how enhancements to the environment post construction will be achieved including demonstrating consideration of how proposals can contribute towards biodiversity net gain (as set out in Section 4.5 of EN-1 and the Environment Act 2021), as well as wider environmental improvements in line with the Environmental Improvement Plan and environmental targets (paragraph 4.2.29 of EN-1);<br><br>• how the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;<br><br>• how enhancements to the landscape and environmental assets may contribute to overall | The **ES (Application Document 6.2)** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Proposed Project. Section 7 of **the Planning Statement** sets out the measures taken to mitigate the impacts, broken down by various themes.<br><br>Consideration of design for the Proposed Project is demonstrated in **Application Document 7.3 Design Development Report**. Consideration of design for the Proposed Project, in accordance with the Holford and Horlock rules, is demonstrated in **Application Document 7.3 Design Development Report**.<br><br>The approach to coordination and assessment of impacts is evidenced in **Application Document 7.10 Coordination Document.** |

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| | landscape and townscape quality as set out in EN-1 4.6.13 and 5.10.23;<br>• how the mitigation hierarchy has been followed, in particular to avoid the need for compensatory measures for coastal, inshore and offshore developments affecting SACs SPAs, and Ramsar sites and MCZs as set out in EN-3 2.8;<br>• For designated landscapes the principal mitigation measure, as established by the Holford Rules, should be to seek to avoid landfall in these areas. | |
| ***2.15 Offshore-onshore transmission: Secretary of State decision-making*** | | |
| 2.15.1 | Coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community, and other impacts, as set out above, must be considered. The Secretary of State must be satisfied that applicants have explained the steps they have taken to do this, the options that have been considered and the approach they have taken to coordination as set out in above at section 2.13. This evidence is expected to draw substantially on the work under the Offshore Transmission Network Review and relevant strategic network design exercises, together with any additional supporting evidence applicants consider relevant. The Secretary of State should also be satisfied that options for coordination have been considered and evaluated appropriately. | **Application Document 7.10 Coordination Document** explains the types of coordination considered by National Grid to date as part of the Sea Link Project. Coordination in the approach to consenting; site and routing selection; design; and delivery of the Proposed Project with other proximate projects has been considered appropriately and has been, and can be, achieved where practicable. This is anticipated to minimise environmental and local community effects of the Proposed Project in combination with other projects following its consent, and in the future.<br><br>National Grid remains committed to continuing engagement with all the projects identified to secure these coordination benefits and to also explore further opportunities for coordination where they arise. |

# Appendix B Marine Plans Accordance Tables

## Appendix Table B.1 Marine Plans Accordance Tables

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| 2.3.2.1 | Enforcement or authorisation decisions that affect or might affect the UK marine area must be made in accordance with the relevant marine policy documents unless relevant considerations, such as advances in scientific knowledge and technology for example, indicate otherwise. This means that decisions on activities in the UK marine area will be plan led once Marine Plans are in place. In the interim, decisions must be made in accordance with the MPS. In either case, the same approach will apply and the decision maker should weigh the potential benefits and adverse effects of each proposal, drawing on different, identifiable lines of evidence to consider the different impacts of a proposal. When considering potential benefits and adverse effects, decision makers should also take into account any multiple and cumulative impacts of proposals, in the light of other projects and activities. The level of assessment undertaken for any project should be proportionate to the scale and impact of the project as well as the sensitivity of the environment concerned and in accordance with the Environmental Impact Assessment (EIA) Directive (Directive 85/337/EEC) where applicable. An Appropriate Assessment in accordance with the Habitats Directive | As set out in Section 4 of **Application Document 7.1 Planning Statement,** the following marine plans for the Proposed Project are the East Inshore and East Offshore Marine Plans and the South East Inshore Marine Plan. The Planning Statement provides an assessment of the compliance of the Offshore Scheme against the relevant policies of these marine plans.<br>The Planning Statement also provides an assessment of the planning balance, considering the key benefits of the Proposed Project against its likely significant operational (permanent) adverse effects, having regard to the conclusions of the Environmental Impact Assessment (EIA) presented in **Volume 6 Environmental Statement.** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | (Directive 92/43/EC) may also be required, in accordance with relevant national legislation and Government circulars or guidance. | |
| 2.3.2.2 | There are a number of principles that should also be taken into account, specifically that decisions should:<br>• Be based on the detailed information and advice in the relevant marine policy documents in the respective Administrations;<br>• Be conducted in a manner that meets requirements under UK and EU legislation and is consistent with our obligations under international law;<br>• Be conducted in a way that takes into account all of the relevant UK Administrations' policy objectives affecting the marine area;<br>• Be conducted in a manner that takes account of other relevant projects, programmes, plans and national policies and guidance;<br>• Be taken after appropriate liaison with terrestrial planning authorities and other regulators, and in consultation with statutory and other advisors when appropriate;<br>• Be streamlined where possible, making effective use of existing data;<br>• Be taken using a risk-based approach that allows for uncertainty, recognising the need to use sound science responsibly as set out in the high level objectives; | **Application Document 7.1 Planning Statement** sets out the legislative and planning policy context that is relevant to the Proposed Project, including local development plans, marine policy documents and other guidance.<br>Appropriate liaison with terrestrial planning authorities and other regulators, including the Marine Management Organisation (MMO), has taken place during the preparation of the DCO Application and is detailed in **Application Document 5.1 Consultation Report**.<br>The Proposed Project has been subject to an EIA to evaluate and identify the likely significant environmental effects arising from its construction, operation and decommissioning phases, in order to provide decision-makers with the environmental information they require to determine the application. This is presented in **Volume 6 Environmental Statement. Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Method** sets out how the technical, temporal and geographical scope has been defined for the Proposed Project and describes the general approach used in the assessment and the assumptions upon which the assessment is based.<br>The EIA has assessed potential impacts on sites of particular significance, including designated heritage assets (**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage, Application Document** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | • Be sensitive to any potential impacts on sites of particular significance including those protected under environmental legislation or designated in relation to cultural heritage; of particular social or economic significance;<br>• Take account of potential impacts of climate change mitigation and adaptation in individual applications to ensure that any appropriate adaptation and mitigation measures have been identified;<br>• Take account of the benefits that good design (including the best use of available technologies and innovation) can deliver; and<br>• Look to avoid and then mitigate negative impacts where possible at various stages of development, including appropriate conditions in line with legal obligations, in a manner that is proportionate to the potential impacts of the proposal under consideration. Where alternative site selection or design could mitigate negative effects whilst retaining benefits, this should be considered, where appropriate | **6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage,** and **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**) and internationally/nationally important sites for nature conservation (**Application Document 6.6 Habitat Regulations Assessment** and **Application Document 6.11 Marine Conservation Zone Assessment**).<br>A climate change assessment has been undertaken for the Proposed Project and is presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**.<br>An appraisal of how the Proposed Project complies with relevant planning policies relating to good design in provided in **Application Document 7.1 Planning Statement.**<br>Each topic chapter of the ES **(Volume 6 Environmental Statement)** has identified proposed mitigation measures that are required to address potential significant adverse effects of the Proposed Project, following the mitigation hierarchy.<br>It is considered that the high-level principles for decision-making set out in the MPS have been taken into account. |
| 2.6.1 (Marine ecology and biodiversity) | Marine plan authorities should be mindful that, consistent with the high-level marine objectives, the UK aims to ensure:<br>• A halting and, if possible, a reversal of biodiversity loss with species and habitats operating as a part of healthy, functioning ecosystems; and | **Application Document 6.2.4.2 Part 4 Chapter 2 Benthic Ecology, Application Document 6.2.4.3 Part 4 Chapter 3 Fish and Shellfish, Application Document 6.2.4.4 Part 4 Chapter 4 Marine Mammals** and **Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology assess** impacts to biodiversity from the Offshore Scheme and conclude that no likely significant effects are expected on marine ecology or biodiversity. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | • The general acceptance of biodiversity's essential role in enhancing the quality of life, with its conservation becoming a natural consideration in all relevant public, private and non-governmental decisions and policies. | These assessments are supported by **Application Document 6.6 Habitat Regulations Assessment (HRA) Report** and **Application Document 6.11 Marine Conservation Zone Assessment**. |
| 2.6.6.6 (Historic environment) | Marine activities have the potential to result in adverse effects on the historic environment both directly and indirectly, including damage to or destruction of heritage assets. In developing and implementing Marine Plans, the marine plan authority should take into account the available evidence, including information and advice from the relevant regulator and advisors, in relation to the significance of any identified heritage assets (or the potential for such assets to be discovered), and consider how they are managed. It should also take into account the historic character of the plan area, with particular attention paid to the landscapes (see section 2.6.5) and groupings of assets that give it a distinctive identity. | A full assessment of the potential impacts of the Offshore Scheme on marine heritage assets is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 5 Marine Archaeology**.<br><br>The assessment concludes that, with the implementation of mitigation measures presented in section 6.8 of the chapter, the residual effects of all potential impacts on marine heritage assets should be reduced to between negligible adverse and minor beneficial, which are not considered significant. |
| 3.2.9 (Defence and National Security) | The construction and operation of offshore marine infrastructure, installations and activities, as well as policies on conservation designations and the health of the wider environment may impact on defence interests in certain areas. Marine plan authorities and decision makers should take full account of the individual and cumulative effects of marine infrastructure on both marine and land-based MoD interests. Marine plan authorities, decision makers and developers should consult the MoD in all circumstances to verify whether defence interests will be affected | Cumulative impacts of the Offshore Scheme of Proposed Project with other plans and projects have been assessed and included in ES. This is presented in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Intra-Project Cumulative Effects** and **6.2.4.12 Part 4 Marine Chapter 12 Inter-Project Cumulative Effects**. No significant cumulative impacts have been identified for the Offshore Scheme.<br>The MOD will be notified prior to any activities taking place in military practice and exercise areas. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| 3.4.7 (Ports and shipping) | Increased competition for marine resources may affect the sea space available for the safe navigation of ships. Marine plan authorities and decision makers should take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety and ensure that their decisions are in compliance with international maritime law. Marine Plan development and individual decisions should also take account of environmental, social and economic effects and be in compliance with international maritime law. Marine plan authorities will also need to take account of the need to protect the efficiency and resilience of continuing port operations, as well as further port development | The likely significant effects on shipping and navigation have been assessed in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** The assessment concludes that all risks to shipping and navigation receptors associated with the Offshore Scheme are either “Broadly Acceptable” or "Tolerable if ALARP”. As such, the risks and therefore any significant effects are considered to be tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily. |
| 3.8.10 (Fisheries) | Marine plan authorities should consider the potential social and economic impacts of other developments on fishing activity, as well as potential environmental impacts. They should, for example, have regard to the impacts of displacement and whether it is possible for vessels to relocate to other fishing grounds. They should also consider the potential impacts of this displacement on the viability of fish stocks and on the marine landscape in the alternative fishing grounds. They will also wish to consider and measure the impacts on local communities of any reduction in fishing activity, redistribution of fishing effort or associated impact on related businesses as the result of a marine development. Marine plan authorities should engage with other regions to where activity is displaced to ensure that a comprehensive picture of impacts is developed and unintended consequences are avoided. Wherever | The assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** has considered both direct impacts on fishing activities and indirect impacts such as displacement.<br><br>Embedded measures have been integral for reducing the Proposed Projects impact on commercial fisheries. **Application Document 7.5.3.2 Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, sets out mitigation measures to maintain a Fisheries Liaison Officer (FLO) and fisheries working group(s) throughout the construction phase 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 |

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| | possible, decision makers should seek to encourage opportunities for co-existence between fishing and other activities | **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** concludes that the impact of the Offshore Scheme on fishing activities is expected to have no likely significant effects |

## East Inshore and East Offshore Marine Plans

| Relevant Paragraph/Policy Reference | Policy Requirement | |
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| Policy EC1 | Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported. | The Proposed Project will make a significant contribution to UK Government's ambitious target of 50GW of generating offshore wind energy by 2030 and comprises Critical National Priority (CNP) infrastructure (as explained in Section 8 of this Planning Statement). As set out in NPS EN-1 (DESNZ, 2023), high quality energy infrastructure is crucial for economic growth, boosting productivity and competitiveness. Further details on the Proposed Project needs case is presented in **Application Document 7.2 Strategic Options Back Check Report.**<br>The Socio-economic impacts and benefits of the Proposed Project are considered in **Application Documents 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and **6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism.**<br>It is estimated that that the Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff which is expected in 2028 lasting for one day. An average of 86 gross direct FTE jobs is estimated to be required onsite per annum over the construction period. Taking into account of leakage effects, it is estimated that the Proposed Project would create 26 FTE jobs per annum for residents within the local area (60-minute drive time from the Suffolk Onshore Scheme construction compounds) during the construction phase.<br>It is estimated that the Kent Onshore Scheme will require a peak workforce of 241 FTE staff per day. The peak construction workforce will occur for a duration of two days in 2030. An average of 67 gross direct FTE jobs is estimated to be required onsite per annum over the construction period. |
| Policy EC2 | Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas. | |

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| | | Taking into account of leakage effects, it is estimated that the Kent Onshore Scheme would create 20 FTE jobs per annum for residents within the local area (60-minute drive time from the Kent Onshore Scheme construction compounds). |
| Policy EC3 | Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported. | The Proposed Project is a proposal by National Grid Electricity Transmission plc to reinforce the transmission network in the South East of England and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon energy generation, as well as additional new interconnection with mainland Europe.<br>The Proposed Project will make a significant contribution to UK Government's ambitious target of 50GW of generating offshore wind energy by 2030. Further details on the Proposed Project needs case is presented in **Application Document 7.2 Strategic Options Back Check Report** outlining the benefits of the Proposed Project for Offshore Wind Energy. |
| Policy SOC1 | Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported. | **Application Documents 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** present the assessment of the likely significant health and wellbeing effects that could result from the Proposed Project. The chapters conclude that no likely significant residual adverse effects have been identified in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme and the Kent Onshore Scheme.<br>The Proposed Project would maintain access to the coast and marine area. National Grid has committed to using trenchless techniques during landfall construction work in order to reduce disruption on the beach at Suffolk and Kent. During offshore construction, safety zones may be required, however the impacts of these on other sea users and local communities would be localised and temporary, with access retained for the wider marine area. |

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| Policy SOC2 | Proposals that may affect heritage assets should demonstrate, in order of preference:<br>a) that they will not compromise or harm elements which contribute to the significance of the heritage asset<br>b) how, if there is compromise or harm to a heritage asset, this will be minimised<br>c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or<br>d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset. | A full assessment of the potential impacts of the Offshore Scheme on marine heritage assets is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**. The assessment concludes that, with the implementation of mitigation measures presented in Section 6.8 of the chapter, the residual effects of all potential impacts on marine heritage assets should be reduced to between negligible adverse and minor beneficial, which are not considered significant.<br>**Application Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B REAC** outline mitigation measures and strategies to be put in place that follow the mitigation hierarchy in order to, in first instance avoid or minimise archaeological impacts and effects through the process of design development. Where avoidance is not possible, embedded mitigation is proposed in order to reduce impacts. |
| Policy SOC3 | Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:<br>a) that they will not adversely impact the terrestrial and marine character of an area<br>b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them<br>c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts. | The Offshore Scheme is not expected to impact the seascape or marine character of the area as the cable will be buried, with no subsea infrastructure visible. **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Kent Chapter 1 Landscape and Visual** provide an assessment of the likely terrestrial significant landscape and visual effects that could result from the Suffolk and Kent Onshore Schemes. The assessment of seascape character effects concludes that there would be limited potential for significant effects on seascape receptors during operation and maintenance, with significant effects during construction (including decommissioning) being temporary (**Application Document 6.3.2.1C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.3.1.C Appendix 3.1.C Landscape Designation and Landscape Character Assessment**). |

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| Policy ECO1 | Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. | Cumulative impacts of the Offshore Scheme with other plans and projects have been assessed and included in ES. This is presented in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**. The assessment of inter-project cumulative effects for the Proposed Project and shortlisted developments identified no significant effects after the application of mitigation measures for all topics.<br><br>**Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects** considers intra-project cumulative effects from the Proposed Project (where a single receptor is affected by multiple aspects of a project). No intra-cumulative effects are anticipated on marine receptors during the Proposed Project.<br><br>For the Suffolk Onshore Scheme, cumulative impacts assessments are presented in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.**<br><br>The majority of significant cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature. The only permanent significant cumulative effect identified for the Suffolk Scheme for which no additional mitigation can be provided is the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk,** and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |

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| | | **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project** presents details of the 'project-wide' (combined) effects' of the project. No project-wide (combined) effects of the Suffolk Onshore Scheme and Kent Onshore Scheme were identified. |
| Policy ECO2 | The risk of release of hazardous substances as a secondary effect due to any increased collision risk should be taken account of in proposals that require an authorisation. | Accidents and disasters through collisions are presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation**. With the embedded control and management measures identified in Section 7.8 of Chapter 7 in place, these impacts are considered to be as low as reasonably practicable and therefore unlikely to be significant<br>All project vessels must comply with the International Regulations for Preventing Collisions at Sea (1972), regulations relating to International Convention for the Prevention of Pollution from Ships (the MARPOL Convention 73/78), with the aim of preventing and minimising pollution from ships and the international Convention for the Safety of Life at Sea (SOLAS, 1974). This is also discussed further within **Application Document 7.5.2 Outline Offshore CEMP**.<br><br>Measures to address the release of hazardous substances and the effects of collisions are secured via **Application Document 7.5.2 Offshore CEMP**, **Application Document 7.5.3.1 Outline CoCP** and **Application Document 7.5.3.2 CEMP Appendix B REAC** under DCO Schedule 3, Requirement 6 Offshore CCEMP. |
| Policy BIO1 | Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial). | **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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme and conclude that no likely significant |

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| | | effects are expected on benthic ecology, fish and shellfish, marine mammals and ornithology receptors.<br>These assessments are supported by **Application Document 6.6 HRA Report** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas.<br>The HRA contains a full consideration of Likely Significant Effects (LSE) on internationally important wildlife sites and concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC.<br>**Application Document 6.11 Marine Conservation Zone Assessment** concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project related activities.<br>The mitigation hierarchy for impacts to marine biodiversity has been applied when identifying a marine cable corridor for the Offshore Scheme to avoid key sensitive habitats and Marine Protected Areas. |
| Policy BIO2 | Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. | Biodiversity Net Gain for the Suffolk and Kent Onshore Schemes is considered within **Application Document 6.12 Biodiversity Net Gain Feasibility Report**. Habitat loss as a result of the Offshore Scheme will be highly localised to the cable corridor and will not impact wider ecosystem functioning or biodiversity. Furthermore, any habitat disturbance will be temporary and would be expected to recover over short periods of time. |

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| Policy MPA1 | Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network. | **Application Document 6.6 HRA Report** provides an assessment of the potential of the Offshore Scheme to affect Habitats Sites. The HRA concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary. **Application Document 6.11 Marine Conservation Zone Assessment** provides an assessment of the potential of the Offshore Scheme to affect protected features of Marine Conservation Zones and any ecological or geomorphological process on which the protected feature is dependent on. This concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of Proposed Project related activities. |
| Policy CC1 | Proposals should take account of: how they may be impacted upon by, and respond to, climate change over their lifetime and how they may impact upon any climate change adaptation measures elsewhere during their lifetime. Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. | A climate change assessment has been undertaken for the Proposed Project and is presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. The assessment concluded that the effects on the global climate from the Proposed Project are not likely to be significant because the Proposed Project's Green House Gas (GHG) impacts are fully consistent with applicable existing and emerging policy requirements set by the government to support them in reaching their net zero target and move away from the use of fossil fuels. The assessment also concluded that the effect from climate change impacts on the Proposed Project are not anticipated to be significant. Where any climate change impacts are identified they will be managed through the appropriate mitigation.<br>Embedded measures have been integral in reducing, and where possible avoiding, the climate change effects of the Proposed Project. Measures that that have been incorporated |
| Policy CC2 | Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal. | |

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| | | include commitments made in **Application Document 7.5.3.2 CEMP Appendix B REAC,** such as the use of materials with low-embodied carbon (low carbon concrete and steel) and use of low-carbon construction techniques (low-carbon plan, vehicles and equipment). The GHG management process is detailed in **Application Document 7.5.13 Greenhouse Gas Reduction Strategy.** This document sets out how the GHG emissions associated with the Proposed Project should be managed and reduced and includes a framework for identifying and prioritising GHG reduction opportunities. |
| Policy GOV1 | Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. | The onshore infrastructure required for the Proposed Project is detailed in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Of particular relevance to the Marine Plan area are the landfall works, where trenchless installation will be undertaken from the onshore landfall area to the subtidal zone in Suffolk and wider intertidal zone in Kent. Port provisions required to support works in the offshore project area will be identified post consent. This approach is standard for offshore developments, due to commercial and procurement constraints. Where port assumptions are required to inform the assessment, the worst-case scenario is described in the relevant ES chapters. The Offshore Scheme does not significantly compromise other terrestrial developments or activities in the marine area. |
| Policy GOV2 | Opportunities for co-existence should be maximised wherever possible. | The Proposed Project has explored the concept of co-locating onshore converter stations, sharing cable corridors and consolidating landfalls with other large-scale terrestrial and marine electricity transmission projects currently proposed or consented within its proximity (please refer to **Application Document 7.13 Coordination Document** for further details).<br>Likely significant effects on commercial fisheries and other marine users have been assessed in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries and** |

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| | | **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users.** The latter includes marine tourism and recreation, offshore wind farms, sub-sea cables, dredging and disposal sites, and Ministry of Defence activities. These chapters conclude that with mitigation in place (through commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC** secured via **Application Document 7.5.2 Offshore CEMP**, **Application Document 7.5.3.1 Outline CoCP** under DCO Schedule 3, Requirement 6 Offshore CEMP, adverse effects would not be significant.<br>In addition, likely significant effects on shipping and navigation have also been assessed in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** The assessment concludes that all risks to shipping and navigation receptors associated with the Offshore Scheme are either “Broadly Acceptable” or "Tolerable if ALARP”. As such, the risks and therefore any significant effects are considered to be tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily. |
| Policy GOV3 | Proposals should demonstrate in order of preference:<br>a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities<br>b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them<br>c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of displacement | Likely significant effects on commercial fisheries and other marine users, including the potential for displacement of fishing activity, have been considered in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** and **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users**. The latter covers marine tourism and recreation, offshore wind farms, sub-sea cables, dredging and disposal sites, and Ministry of Defence activities. These chapters conclude that with mitigation in place (through commitments made within **Application Document 7.5.3.2 CEMP Appendix B REAC** secured via **Application Document 7.5.2 Offshore CEMP**, **Application Document 7.5.3.1 Outline CoCP** under DCO Schedule 3, Requirement 6 Offshore CEMP), adverse effects, including effects of displacement, would not be significant. |

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| Policy DEF1 | Proposals in or affecting Ministry of Defence Danger and Exercise Areas should not be authorised without agreement from the Ministry of Defence. | Kentish Knock military practice and exercise area (PEXA) intersects the Offshore Scheme. Given any safety zones around vessels move at the rate of the associated vessels, any disruption will be localised and short term, representing only a slight increase from baseline conditions as per the assessment presented in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**. |
| Policy WIND1 | Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless<br>a) they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm<br>b) the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered<br>c) the lease/agreement for lease has been terminated by the Secretary of State<br>d) in other exceptional circumstances. | Likely significant effects on infrastructure and other marine users have been considered in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation, Application Document 6.2.4.9 Part 4 Marine Chapter 9 Commercial Fisheries** and **Application Document 6.2.4.10 Part 4 Marine Chapter 9 Other Sea Users**.<br>The Offshore Scheme intersects or passes within close proximity a number of existing, pre-planning application stage, consented or under construction offshore windfarm export cables. However, the Proposed Project will only restrict development in a relatively narrow corridor of seabed. Once installed, a working zone may be required either side of the submarine cables to enable access for cable maintenance and repair operations. According to subsea cable guidance, the working zone is 500m either side of the existing subsea cable. |
| Policy WIND2 | Proposals for Offshore Wind Farms inside Round 3 zones, including relevant supporting projects and infrastructure, should be supported. | |
| Policy PS1 | Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization designated routes. | No static sea surface infrastructure is proposed as part of the Offshore Scheme. Under-keel clearance is also not likely to be significantly reduced and has been considered within **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation.** |
| Policy PS2 | Proposals that require static sea surface infrastructure that encroaches upon important navigation routes should not be authorised unless | |

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| | there are exceptional circumstances. Proposals should:<br>a) be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact<br>b) anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and<br>c) account for impacts upon navigation in-combination with other existing and proposed activities | |
| Policy PS3 | Proposals should demonstrate, in order of preference:<br>a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours<br>b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this<br>c) how, if the interference cannot be minimised, it will be mitigated d) the case for proceeding if it is not possible to minimise or mitigate the interference. | The likely effects from the Offshore Scheme on shipping and navigation are considered in **Application Document 6.2.4.8 Part 4 Marine Chapter 7 Shipping and Navigation**. This chapter is supported by **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment**. The assessment concludes that all risks to shipping and navigation associated with the Offshore Scheme are either “Broadly Acceptable” or "Tolerable if ALARP”. As such, the risks and therefore any significant effects are considered to be tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily. The Proposed Project does not interfere with the expansion of ports and harbours in the Study Area. |
| Policy DD1 | Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference<br>a) that they will not adversely impact dredging and disposal activities<br>b) how, if there are adverse impacts on dredging and disposal, they will minimise these<br>c) how, if the adverse impacts cannot be minimised they will be mitigated | A detailed Shipping and Navigation assessment is presented in **Application Document 6.3.4.7.A Navigational Risk Assessment**. Several navigational dredging sites have been identified in the Study Area (10 km of Order Limits), including Harwich Haven navigation channel, Pegwell Bay, North West Shipwash dredging site, the London Gateway Port navigation channel, the Inner Gabbard dredging area, Greater Gabbard dredging area and Project 8 Windserver dredging area. Several licensed disposal sites have also been identified in the study area, including the Inner Gabbard, Inner Gabbard East disposal site, EA One Route EC-3 disposal area, and Harwich |

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| | d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts. | Haven disposal site. A number of closed and disused disposal sites have also been identified within the Study Area. Any disturbance from the physical presence of vessels will be temporary, with any restrictions to commercial operations short term and representing only a very slight change from baseline conditions. Various mitigation measure to mitigate any risks and effects are set out in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation**. These include Commitments made within **Application Document 7.5.3.2 Appendix B REAC** and measures included within **Application Document 7.5.3.1 Appendix A Outline CoCP** which are secured through Requirement 6 in Schedule 3 of **Application Document 3.1 Draft DCO**. |
| Policy AGG1 | Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised unless there are exceptional circumstances. | There are a number of mineral and aggregate extraction areas located within the Study Area (10 km of Order Limits). Although these areas do not overlap with the Offshore Scheme, three are located within 1 km. Minor vessel routing changes may be required due to increased vessel movements and the presence of any safety zones. Any disturbance from the physical presence of vessels will be temporary, with any restrictions to commercial operations short term and representing only a very slight change from baseline conditions. |
| Policy AGG2 | Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the other development or activity is compatible with aggregate extraction or there are exceptional circumstances. | |
| Policy AGG3 | Within defined areas of high potential aggregate resource, proposals should demonstrate in order of preference: a) that they will not, prevent aggregate extraction b) how, if there are adverse impacts on aggregate extraction, they will minimise these c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the application if it is not possible to minimise or mitigate the adverse impacts. | |

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| Policy CAB1 | Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. | The Offshore shore infrastructure required for the Proposed Project is detailed in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. The Offshore Scheme is proposing cable burial as the primary method of installation across the cable route. |
| Policy FISH1 | Within areas of fishing activity, proposals should demonstrate in order of preference:<br>a) that they will not prevent fishing activities on, or access to, fishing grounds<br>b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts | **Application Document 6.2.4.9 Part 4 Marine Chapter 8 Commercial Fisheries** considers the impact of the Offshore Scheme on fishing activities including on spawning and nursey areas. The Proposed Project has undertaken extensive routing and siting in order to reduce impacts to fishermen and fishing grounds. Avoidance of sensitive areas has been incorporated into the design where feasible as presented in the **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022).**<br>Effects on commercial fisheries are first avoided where possible. Where this is not possible, the effects will be minimised through duration of installation activities and planned liaison with fishers. There is currently potential for effects of moderate significance to occur on static gear fisheries, related to temporary loss or alteration of fishing grounds. However, with mitigation, the residual impacts could potentially be reduced to a minor significance which would not be significant. Application Document 6.2.4.8 Part 4 Chapter 9 Commercial Fisheries concludes that no further significant effects are anticipated.<br>The ES demonstrates that the Offshore Scheme successfully avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats, including spawning and nursery areas. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases (please see Section 8.3 of the |
| Policy FISH2 | Proposals should demonstrate, in order of preference:<br>a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat<br>b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them<br>c) how, if the adverse impacts cannot be minimised they will be mitigated<br>d) the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts. | |

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| | | **Application Document 7.1 Planning Statement**). All residual effects on fish and shellfish from the Offshore Scheme have been assessed as not significant. |
| Policy AQ1 | Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference: a) that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential b) how, if there are adverse impacts on aquaculture development, they can be minimised c) how, if the adverse impacts cannot be minimised they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | The Study Area (10 km from Order Limits) is intersected by the Outer Thames shellfish waters; however, the Offshore Scheme boundary does not intersect this shellfish water boundary and is located at a distance of over 5 km. Any disturbance from the physical presence of vessels will be temporary, with any restrictions to commercial operations short term, representing only a slight increase from baseline conditions. |
| Policy TR1 | Proposals for development should demonstrate that during construction and operation, in order of preference:<br>a) they will not adversely impact tourism and recreation activities<br>b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts. | Likely significant effects to tourism and recreation during construction and operation are presented in **Application Documents 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and **Application 6.2.3.10 Part 3 Chapter 10 Socio-Economics, Recreation and Tourism.** Likely significant effects to other sea users is presented in **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Other Sea Users**. No offshore static objects are included as part of the Proposed Project as the cable will be buried. No significant adverse impacts on tourism and recreation are anticipated. Although works during construction, maintenance and decommissioning may temporarily disrupt activities at both landfalls and nearshore for the short term, recreational sailors will be able to use other areas in close proximity.<br><br>The assessment presented in **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Other Sea Users** also |
| Policy TR2 | Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: a) that they will not adversely impact on recreational boating routes | |

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| | b) how, if there are adverse impacts on recreational boating routes, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | finds that it is not considered likely that visual intrusion and noise will deter recreational boating and fishing during construction, operation, maintenance and decommissioning. The Offshore Scheme is therefore complaint with Policy TR2. |
| Policy TR3 | Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported. | Likely significant effects to tourism and recreation during construction and operation are presented in **Application Documents 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism.** The Proposed Project is not proposing measures to promote or facilitate sustainable tourism to the marine area as part of the Offshore Scheme. No significant adverse impacts on sustainable tourism are anticipated. |

# South East Inshore Marine Plan

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy SE-INF-1 | Proposals for appropriate marine infrastructure which facilitates land-based activities, or land based infrastructure which facilitates marine activities (including the diversification or regeneration of sustainable marine industries), should be supported. | The onshore infrastructure required for the Proposed Project is detailed in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. Of particular relevance to the Marine Plan area are the landfall works, where trenchless installation will be undertaken from the onshore landfall area to the subtidal zone in Suffolk and wider intertidal zone in Kent. Port provisions required to support works in the Offshore Scheme will be identified post consent. This approach is standard for offshore developments, due to commercial and procurement constraints. Where port assumptions are required to inform the assessment, the worst-case scenario is described in the relevant ES chapters. |
| Policy SE-CO-1 | Proposals that optimise the use of space and incorporate opportunities for co-existence and cooperation with existing activities will be supported.<br>Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | The Proposed Project has explored the concept of co-locating onshore converter stations, sharing cable corridors and consolidating landfalls with other large-scale terrestrial and marine electricity transmission projects currently proposed or consented within its proximity (please refer to **Application Document 7.13 Coordination Document** for further details).<br>Likely significant effects on commercial fisheries and other marine users, including the potential for displacement of fishing activity, have been considered in **Application Document 6.2.4.9 Part 4 Marine Chapter 8 Commercial Fisheries** and **Application Document 6.2.4.10 Part 4 Marine Chapter 9 Other Sea Users**. The latter covers marine tourism and recreation, offshore wind farms, sub-sea cables, dredging and disposal sites, and Ministry of Defence activities. These chapters |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding. | conclude that with mitigation in place, adverse effects, including effects of displacement, would not be significant.<br>In addition, likely significant effects on shipping and navigation are considered in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation.** The assessment concludes that all risks to shipping and navigation associated with the Offshore Scheme are either “Broadly Acceptable” or "Tolerable if ALARP”. As such, the risks and therefore any significant effects are considered to be tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily. |
| Policy SE-AGG-1 | Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised, unless it is demonstrated that the proposal is compatible with aggregate extraction. | Although no mineral and aggregate extraction areas overlap with the Offshore Scheme, three mineral and aggregate extraction areas are located within 1 km of the Offshore Scheme Construction activities will be short-term. Crossing and proximity agreements will be agreed with asset owners as required, in order to manage risks. Mitigation and control measures will include the application of exclusion zones. During operation, a regular maintenance regime is not required to maintain the integrity of the link and the number of vessels associated with operation and maintenance of the cable is expected to be considerably lower than for construction. |
| Policy SE-AGG-2 | Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the proposal is compatible with aggregate extraction. | |
| Policy SE-AGG-3 | Proposals in areas of high potential aggregate resource that may have significant adverse impacts on future aggregate extraction should demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate | The likely significant effects of the Offshore Scheme on mineral and aggregate extraction are assessed in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** and are considered to be not significant.<br>The Proposed Project will not significantly affect marine aggregate licence areas, marine aggregate Exploration and Option Agreement areas and areas of high potential aggregate resource. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | - significant adverse impacts on future aggregate extraction so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. | |
| Policy SE-AQ-1 | Proposals within existing or potential strategic areas of sustainable aquaculture production must demonstrate consideration of and compatibility with sustainable aquaculture production. Where compatibility is not possible, proposals that may have significant adverse impacts on sustainable aquaculture production must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts on sustainable aquaculture production so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. | The Outer Thames shellfish waters is located at a distance of over 5 km and therefore does not intersect the Offshore Scheme. Any disturbance from the physical presence of vessels will be temporary, with any restrictions to commercial operations short term, representing only a slight increase from baseline conditions. The likely significant effects of the Offshore Scheme on aquaculture during construction, operation and maintenance and decommissioning are assessed **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** and are considered to be not significant. |
| Policy SE-CAB-1 | Preference should be given to proposals for cable installation where the method of protection is burial.<br>Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. Where burial or protection measures are not appropriate, | The offshore infrastructure required for the Proposed Project is detailed in **Application Document 6.2.1.4 Part 1 Introduction Description of the Proposed Project**. The Offshore Scheme is proposing cable burial as the primary method of installation across the cable route. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | proposals should state the case for proceeding without those measures. | |
| Policy SE-CAB-2 | Proposals demonstrating compatibility with existing landfall sites and incorporating measures to enable development of future landfall opportunities should be supported. Where this is not possible proposals will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts on existing and potential future landfall sites so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. | The Proposed Project has explored the concept of co-locating onshore converter stations, sharing cable corridors and consolidating landfalls with other large-scale terrestrial and marine electricity transmission projects currently proposed or consented within its proximity (please refer to **Application Document 7.13 Coordination Document** for further details). |
| Policy SE-CAB-3 | Where seeking to locate close to existing subsea cables, proposals should demonstrate compatibility with ongoing function, maintenance and decommissioning activities relating to the cable. | The Offshore Scheme will cross a number of active, planned and out of service cables. A list of current in-service and planned cables potentially interacting with the Proposed Project is presented in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users**. No existing or known planned pipelines are present across the Offshore Scheme. Crossing infrastructure will be required where the Offshore Scheme cross existing subsea cable infrastructure or those which are planned where construction coincides with the Offshore Scheme. Crossing agreements will be agreed with asset owners prior to construction. Proximity agreements will be required to manage risks, including mitigation and controls such as the application of construction zone. The likely significant effects of the Offshore Scheme on offshore infrastructure including subsea cables are |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | assessed in **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** and are considered to be not significant. |
| Policy SE-DD-1 | In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity. | Several navigational dredging sites have been identified within 10 km of the Order Limits, including Harwich Haven navigation channel, Pegwell Bay, North West Shipwash dredging site, the London Gateway Port navigation channel, the Inner Gabbard dredging area, Greater Gabbard dredging area and Project 8 Windserver dredging area. Several licensed disposal sites have also been identified within 10 km of the Order Limits, including the Inner Gabbard, Inner Gabbard East disposal site, EA One Route EC-3 disposal area, and Harwich Haven disposal site. A number of closed and disused disposal sites have also been identified within 10 km of the Order Limits.<br>Any disturbance from the physical presence of vessels during construction will be temporary, with any restrictions to commercial operations short term and representing only a very slight change from baseline conditions. The number of vessels associated with the operation and maintenance of the cable is expected to be considerably lower than that for construction.<br>Please refer to **Application Document 6.2.4.9 Part 4 Marine Chapter 9 Other Sea Users** for further details on the impact of the Proposed Project on dredge and disposal sites. The Proposed Project has been assessed as resulting in a minor/negligible effect (not significant) on dredge and disposal sites, following the application of the mitigation hierarchy. |
| Policy SE-DD-2 | Proposals that cause significant adverse impacts on licensed disposal sites should not be supported. Proposals that may have significant adverse impacts on licensed disposal sites must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate - adverse impacts so they are no longer significant.<br>If it is not possible to mitigate the significant adverse impacts, proposals must state the case for proceeding. | |
| Policy SE-DD-3 | Proposals for the disposal of dredged material must demonstrate that they have been assessed against the waste hierarchy. Where there is the need to identify new dredge disposal sites, | Dredge and disposal are not included as part of the Offshore Scheme activities; however pre-sweeping activities are expected to occur between KP96.32 to KP113.883. There is no designated disposal area for pre-sweeping, the sand will be deposited within |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | including alternative use sites, proposals should be supported if they conform to best practice and guidance. | the Order Limits within the area of pre-sweeping in such a way that the local currents will not backfill the pre-sweep area prior to cable installation and protection. |
| Policy SE-PS-1 | In line with the National Policy Statement for Ports, sustainable port and harbour development should be supported.<br>Only proposals demonstrating compatibility with current port and harbour activities will be supported.<br>Proposals within statutory harbour authority areas or their approaches that detrimentally and materially affect safety of navigation, or the compliance by statutory harbour authorities with the Open Port Duty or the Port Marine Safety Code, will not be authorised unless there are exceptional circumstances.<br>Proposals that may have a significant adverse impact upon future opportunity for sustainable expansion of port and harbour activities, must demonstrate that they will, in order of preference:<br>a) avoid,<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. | Sustainable port development is not considered to be impacted by the Proposed Project. The Proposed Project is compatible with existing port and harbour activities. Furthermore, significant consultation has been undertaken with ports within 10 nautical mile around the Offshore Scheme. A detailed shipping and navigation assessment is presented in **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment**, which considers all effects and mitigation. **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation** presents information about the environmental assessment of the likely shipping and navigation effects that could result from the Proposed Project.The assessment concludes that all risks to shipping and navigation associated with the Offshore Scheme are either “Broadly Acceptable” or "Tolerable if ALARP”. As such, the risks and therefore any significant effects are considered to be tolerable and ALARP, provided that the recommendations for further risk reduction are implemented or otherwise closed out satisfactorily. |

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| Policy SE-PS-2 | Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance must not be authorised within or encroaching upon International Maritime Organization routeing systems unless there are exceptional circumstances. | No static sea surface infrastructure is proposed as part of the Offshore Scheme. Under-keel clearance is also not likely to be significantly reduced as a result of the Offshore Scheme and has been considered within **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Shipping and Navigation**.<br>The Proposed project will not significantly reduced under-keel clearance. |
| Policy SE-PS-3 | Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance which encroaches upon high density navigation routes, strategically important navigation routes, or that pose a risk to the viability of passenger services, must not be authorised unless there are exceptional circumstances. | |
| Policy SE-REN-1 | Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported. | The Proposed Project is a proposal by National Grid Electricity Transmission plc to reinforce the transmission network in the South East of England and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon energy generation, as well as additional new interconnection with mainland Europe.<br>The Proposed Project will be making a significant contribution to UK Government's ambitious target of 50GW of generating offshore wind energy by 2030. Further details on the Proposed Project needs case is presented in **Application Document 7.2 Strategic Options Back Check Report** outlining the benefits of the Proposed Project for Offshore Wind Energy. |
| Policy SE-REN-2 | Proposals for new activity within areas held under a lease or an agreement for lease for renewable energy generation should not be authorised, | The Proposed Project is not located within a lease area for renewable energy generation and represents a significant contribution to renewable energy technology production and |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | unless it is demonstrated that the proposed development or activity will not reduce the ability to construct, operate ordecommission the existing or planned energy generation project. | associated infrastructure / supply chains. The Proposed Project will not compromise the construction, operation, maintenance or decommissioning of any offshore wind farms in the area. |
| Policy SE-REN-3 | Proposals for the installation of infrastructure to generate offshore renewable energy, inside areas of identified potential and subject to relevant assessments, will be supported. | |
| Policy SE-HER-1 | Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported. Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- any harm to the significance of heritage assets.<br>If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets. | A full assessment of marine heritage assets is presented in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology**. The Offshore Scheme has been designed to avoid and/or reduce any impacts to heritage assets. With the implementation of mitigation measures, the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial, which are not considered to be significant. **Application Document 7.5.3.1 Appendix A Outline CoCP** and **Application Document 7.5.3.2 Appendix B REAC** outline mitigation measures and strategies to be put in place to reduce marine archaeological effects. |
| Policy SE-SCP-1 | Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area. | The Offshore Scheme is not expected to impact the seascape or marine character of the area as the cable will be buried, with no subsea infrastructure visible. **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual** provide an assessment of the likely terrestrial significant landscape and visual effects that could |

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| | The location, scale and design of proposals should take account of the character, quality and distinctiveness of the seascape and landscape.<br>Proposals that may have a significant adverse impact on the seascape and landscape of the area should demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant.<br>If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascape and landscape of the area.<br>Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty. | result from the Suffolk and Kent Onshore Schemes. The assessment of seascape character effects concludes that there would be limited potential for significant effects on seascape receptors during operation and maintenance (**Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.3.1.C Appendix 3.1.C Landscape Designation and Landscape Character Assessment**). |
| Policy SE-FISH-1 | Proposals that support a sustainable fishing industry, including the industry's diversification, should be supported. | The Proposed Project will not directly contribute to sustainable fishing industries or directly enhance access for fishing activities or directly enhance essential fish habitat. |
| Policy SE-FISH-2 | Proposals that enhance access for fishing activities should be supported. | **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** considers the impact of the Offshore |

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| | Proposals that may have significant adverse impacts on access for fishing activities must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. | Scheme on fishing activities and concludes that no likely significant effects are expected.<br>The Proposed Project is therefore in line with Policies SE-FISH-1 and SE-FISH-2. |
| Policy SE-FISH-3 | Proposals that enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes should be supported. Proposals that may have significant adverse impacts on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | |
| Policy SE-EMP-1 | Proposals that result in a net increase in marine related employment will be supported, particularly where they meet one or more of the following: | The socio-economic impacts and benefits of the Proposed Project are considered in **Application Documents 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and** |

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| | 1) are aligned with local skills strategies and support the skills available<br>2) create a diversity of opportunities<br>3) create employment in locations identified as the most deprived<br>4) implement new technologies<br>- in, and adjacent to, the south east marine plan area. | **Tourism** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism**.<br>It is estimated that that the Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff which is expected in 2028 lasting for one day. An average of 86 gross direct FTE jobs is estimated to be required onsite per annum over the construction period. Taking into account of leakage effects, it is estimated that the Proposed Project would create 26 FTE jobs per annum for residents within the local area (60-minute drive time from the Suffolk Onshore Scheme construction compounds) during the construction phase.<br>It is estimate that the Kent Onshore Scheme will require a peak workforce of 241 FTE staff per day. The peak construction workforce will occur for a duration of two days in 2030. An average of 67 gross direct FTE jobs is estimated to be required onsite per annum over the construction period. Taking into account of leakage effects, it is estimated that the Kent Onshore Scheme would create 20 FTE jobs per annum for residents within the local area (60-minute drive time from the Kent Onshore Scheme construction compounds) during the construction phase. |
| Policy SE-CC-1 | Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported.<br>Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise | Biodiversity Net Gain for the Onshore Scheme is considered within **Application Document 6.12 Biodversity Net Gain Feasibility Report**. Habitat loss as a result of the Offshore Scheme will be highly localised to the cable corridor and will not impact wider ecosystem functioning or biodiversity. Furthermore, any habitat disturbance will be temporary and would be expected to recover over short periods of time. The Proposed Project is in line with Policy SE-CC-1. |

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| | c) mitigate<br>- adverse impacts so they are no longer significant<br>d) compensate for significant adverse impacts that cannot be mitigated. | |
| Policy SE-CC-2 | Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change. | A climate change assessment has been undertaken for the Proposed Project and presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. The assessment concludes that the effects on the global climate by the Proposed Project are likely to be not significant because the Proposed Project's GHG impacts are fully consistent with applicable existing and emerging policy requirements set by the government to support them in reaching their net zero target and move away from the use of fossil fuels. The assessment also concluded that the effect of climate change impacts on the Proposed Project are not anticipated to be significant. Where any climate change impacts are identified they will be managed through the appropriate mitigation. |
| Policy SE-CC-3 | Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | To minimise impacts of coastal erosion, trenchless techniques will be used to install the HVDC cables at the landfalls.<br>**Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment** presents information about the environmental assessment of the potential significant physical processes effects that could result from the Proposed Project. This includes effects resulting from changes to coastal geomorphological change and associated changes to sediment transport regimes during construction, operation and maintenance and decommissioning. Taking into account of embedded mitigation measures, no likely significant effects from coastal geomorphological change are expected. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy SE-AIR-1 | Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases. Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- air pollution and/or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements. | **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** present information about the environmental assessment of the likely significant air quality effects that could result from the Suffolk Onshore Scheme and the Kent Onshore Scheme. Taking into account of embedded mitigation measures, no likely significant effects to air quality are expected.<br><br>A climate change assessment has been undertaken for the Proposed Project and presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change**. A detailed breakdown of Greenhouse Gas (GHG) emissions is provided in **Application Document 7.5.13 Greenhouse Gas Reduction Strategy.** The assessment concludes that the effects on the global climate by the Proposed Project are likely to be not significant because the Proposed Project's GHG impacts are fully consistent with applicable existing and emerging policy requirements set by the government to support them in reaching their net zero target and move away from the use of fossil fuels. The assessment also concluded that the effect of climate change impacts on the Proposed Project are not anticipated to be significant. Where any climate change impacts are identified they will be managed through the appropriate mitigation. |
| Policy SE-ML-1 | Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction. | The Proposed Project is not proposing measures to remove marine litter as part of the Offshore Scheme. Existing levels of marine litter will remain unchanged. The management of waste during the offshore works will be detailed post consent within the **Application Document 7.5.2 Outline Offshore Construction** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy SE-ML-2 | Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported.<br>Proposals that could potentially increase the amount of marine litter in the marine plan area must include measures to, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- waste entering the marine environment. | **Environmental Management Plan.** This includes a Marine Pollution Contingency Plan (MPCP).<br>In addition, controls for any wastewater discharges (such as effluent discharges, ballast waters, bilge waters, and deck runoff) will be included in the CEMP, in accordance with the latest legislation, regulatory limits and good practice. |
| Policy SE-WQ-1 | Proposals that protect, enhance and restore water quality will be supported.<br>Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- deterioration of water quality in the marine environment. | The Proposed Project is not proposing measures to enhance or restore water quality as part of the Offshore Scheme.<br>Deterioration of water quality is considered in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**, **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** and **Application Document 6.2.4.1 Part 4 Marine Physical Environment**. No likely significant effects to water quality are expected from the Proposed Project.<br>Controls for any wastewater discharges (such as effluent discharges, ballast waters, bilge waters, and deck runoff) will be included in **Application Document 7.5.2 Outline Offshore CEMP**, in accordance with the latest legislation, regulatory limits and good practice. |
| Policy SE-ACC-1 | Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for | Impacts on recreational routes and PRoW which pass within the Suffolk Onshore Scheme and Kent Onshore Scheme are assessed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | tourism and recreation activities, will be supported.<br>Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism.** No likely significant effects are expected from the Proposed Project.<br>The Proposed Project would maintain access to the coast and marine area. National Grid has committed to using trenchless techniques during landfall construction work in order to reduce disruption on the beach at Suffolk and Kent. During offshore construction, safety zones may be required, however the impacts of these on other sea users and local communities would be localised and temporary, with access retained for the wider marine area. |
| Policy SE-TR-1 | Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported.<br>Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | Likely significant effects to tourism and recreation during construction and operation of the Suffolk Onshore Scheme and the Kent Onshore Scheme are presented in **Application Documents 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism** and A**pplication Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism**.<br>Likely significant effects to other sea users, including marine tourism and recreation, is presented in **Application Document 6.2.4.10 Part 4 Marine Chapter 9 Other Sea Users**.<br>No significant adverse impacts on tourism and recreation are anticipated. Although works during construction, maintenance and decommissioning may temporarily disrupt activities at both landfalls and nearshore for the short term, recreational sailors will be able to use other areas in close proximity. |
| Policy SE-SOC-1 | Those bringing forward proposals should consider and demonstrate how their development shall | National Grid has engaged with stakeholders, communities and landowners throughout the site selection process and |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal. | development of the Environmental Statement through the Scoping and PEIR consultation and Expert Topic Groups (please refer to **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation** for further details).<br><br>The Proposed Project has created a number of publically available information sources regarding the baseline environment of the Offshore Scheme, all of which are available on the Sea Link website (https://www.nationalgrid.com/the-great-grid-upgrade/sea-link). |
| Policy SE-DEF-1 | Proposals in or affecting Ministry of Defence areas should only be authorised with agreement from the Ministry of Defence. | Kentish Knock Navy Practice and Exercise Area (PEXA) intersects the Offshore Scheme. The Ministry of Defence will be notified prior to any activities taking place in military practice and exercise areas. Given any safety zones around vessels will move at the rate of the associated vessels, any disruption will be localised and short term, representing only a slight increase from baseline conditions. Please refer to **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Other Sea Users** for further details. |
| Policy SE-MPA-1 | Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported.<br>Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise | **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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme and conclude that no likely significant effects are expected on benthic ecology, fish and shellfish, marine mammals and ornithology. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | c) mitigate<br>- adverse impacts, with due regard given to statutory advice on an ecologically coherent network. | These assessments are supported by **Application Document 6.6 Habitat Regulations Assessment (HRA)** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas.<br>The HRA contains a full consideration of Likely Significant Effects (LSE) on internationally important wildlife sites and concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC.<br>**Application Document 6.11 Marine Conservation Zone Assessment** concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project related activities.<br>The mitigation hierarchy for impacts to marine biodiversity has been applied when identifying a marine cable corridor for the Offshore Scheme to avoid key sensitive habitats and Marine Protected Areas. |
| Policy SE-MPA-2 | Proposals that enhance a marine protected area's ability to adapt to climate change, enhancing the resilience of the marine protected area network, will be supported.<br>Proposals that may have adverse impacts on an individual marine protected area's ability to adapt to the effects of climate change, and so reduce the resilience of the marine protected area network, must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate - adverse impacts | |
| Policy SE-MPA-3 | Where statutory advice states that a marine protected area site condition is deteriorating or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered. | |
| Policy SE-MPA-4 | Proposals that may have significant adverse impacts on designated geodiversity must demonstrate that they will, in order of preference:<br>a) avoid | Likely significant effects to geodiversity is presented in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment**. This concludes that no likely significant |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | effects are expected on seabed morphology and coastal geomorphology from the Offshore Scheme.<br>Effects on designated sites are considered in **Application Document 6.6 Habitat Regulations Assessment** and **Application Document 6.11 Marine Conservation Zone Assessment.** The Proposed Project has been developed to avoid and minimise adverse impacts to geodiversity though a full routing and siting exercise in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022).** |
| Policy SE-BIO-1 | Proposals that enhance the distribution of priority habitats and priority species will be supported.<br>Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate - adverse impacts so they are no longer significant<br>d) compensate for significant adverse impacts that cannot be mitigated. | **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 Marine Chapter 5 Ornithology** assess impacts to biodiversity from the Offshore Scheme and conclude that no likely significant effects are expected on benthic ecology, fish and shellfish, marine mammals and ornithology receptors.<br>These assessments are supported by **Application Document 6.6 Habitat Regulations Assessment (HRA)** and **Application Document 6.11 Marine Conservation Zone Assessment** for marine protected areas. |
| Policy SE-BIO-2 | Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or | The HRA contains a full consideration of Likely Significant Effects (LSE) on internationally important wildlife sites and concludes that during construction, operation and decommissioning, it is not considered that the Offshore Scheme will have an adverse effect on the site integrity or qualifying |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | connectivity, or native species migration, must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant<br>d) compensate for significant adverse impacts that cannot be mitigated. | features of the Outer Thames Estuary SPA, Alde-Ore Estuary SPA and Ramsar, Minsmere-Walberswick SPA, Southern North Sea SAC, Thanet Coast SAC, Thanet Coast and Sandwich Bay SPA, Wash and North Norfolk Coast SAC, Humber Estuary SAC, and Berwickshire and North Northumberland Coast SAC.<br>**Application Document 6.11 Marine Conservation Zone Assessment** concludes that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project related activities.<br>The mitigation hierarchy for impacts to marine biodiversity has been applied when identifying a marine cable corridor for the Offshore Scheme to avoid key sensitive habitats and Marine Protected Areas. |
| Policy SE-BIO-3 | Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported.<br>Proposals must take account of the space required for coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>d) compensate for<br>- net habitat loss. | |
| Policy SE-INNS-1 | Proposals that reduce the risk of introduction and/or spread of invasive non-native species should be supported.<br>Proposals must put in place appropriate measures to avoid or minimise significant adverse impacts that would arise through the introduction and | The use of cables is expected to require protection at some locations, which will introduce hard substrates in the form of rock protection or mattresses, to habitats dominated by sediments ranging from mud to sand and gravel. This could provide additional habitat for any existing epifaunal invasive non-native species (INNS) populations allowing for localised spreading. The |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | transport of invasive non-native species, particularly when:<br>1) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another<br>2) introducing structures suitable for settlement of invasive non-native species, or the spread of invasive non-native species known to exist in the area. | potential impact of the introduction of INNS via vessel hull or ballast water was considered unlikely. To ensure, that the potential impact of INNS introduction is reduced, all rock and concrete mattresses used for cable protection will be clean, so do not provide a vector for INNS directly. Furthermore, although there are concerns around introduced substrata providing habitat for INNS, particularly given the substantial growth of marine infrastructure in the North Sea, to date, no spread of INNS caused by submarine cabling has been documented. **Application Document 7.9 Outline Offshore Invasive Non-Native Species Management Plan** outlines the measures to be adhered to by the Proposed Project. |
| Policy SE-INNS-2 | Public authorities with functions to manage activities that could potentially introduce, transport or spread invasive non-native species should implement adequate biosecurity measures to avoid or minimise the risk of introducing, transporting or spreading invasive non-native species. | |
| Policy SE-DIST-1 | Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts so they are no longer significant. | **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 Marine Chapter 5 Ornithology** assess impacts from the Offshore Scheme on highly mobile species such as fish, marine mammals and birds. These assessments concluded that no likely significant effects are expected from the Offshore Scheme on highly mobile species.<br>Several activities undertaken during the lifetime of the project will generate underwater sound which may disturb or displace highly mobile species. With regard to disturbance from underwater sound, the activity with the highest sound source is the operation of the sub bottom profiler. The distance from sound source at which disturbance can occur, referred to as the Effective |
| Policy SE-UWN-2 | Proposals that result in the generation of impulsive or non-impulsive noise must demonstrate that they will, in order of preference: | |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | a) avoid<br>b) minimise<br>c) mitigate<br>- adverse impacts on highly mobile species so they are no longer significant.<br>If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding. | Deterrent Range (EDR) is 5 km. Thus, the area of disturbance from the project activities identified above is small in relation to the distribution range of the populations of concern. In addition, as project vessels are continuously moving, any disturbance impacts will be transient, intermittent, and short-term.<br>Airborne sound produced during the project life cycle is likely to be limited to vessel operation and landfall activities. Given the slow speeds at which the offshore installation vessels are known to operate during cable installation, it is unlikely that high airborne sound levels offshore will be produced. Project activities will be taking place near Goodwin Sands, where highly mobile species including seals are known to haul-out but activities will only take place at high tide and so disturbance here is unlikely. Seal surveys have also been undertaken at Pegwell Bay to supplement the assessment within **Application Document 6.2.4.4 Part 4 Chapter 4 Marine Mammals** and **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan** has also been included as part of the DCO application. |
| Policy SE-CE-1 | Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will, in order of preference:<br>a) avoid<br>b) minimise<br>c) mitigate<br>- adverse cumulative and/or in-combination effects so they are no longer significant. | Cumulative impacts of the Offshore Scheme with other plans and projects have been assessed and included in ES. This is presented in **Application Document 6.2.4.12 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects**. The assessment of inter-project cumulative effects for the Proposed Project and shortlisted developments identified no significant effects after the application of mitigation measures for all topics.<br>**Application Document 6.2.4.11 Part 4 Marine Chapter 11 Intra-Project Cumulative Effects** considers the intra-project cumulative effects (where a single receptor is affected by multiple aspects of a project). No intra-cumulative effects are anticipated on marine receptors during the Proposed Project. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | For the Kent Onshore Scheme, cumulative impacts assessments are presented in **Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects.**<br><br>The majority of significant cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature.<br><br>There is the potential for a significant total cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1,which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.<br><br>The only permanent significant cumulative effect identified for the Kent Onshore Schemes for which no additional mitigation can be provided is the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.2 Outline Soil Management Plan - Kent,** and **Application Document 7.5.3.1 CEMP Appendix A Outline CoCP** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | **Application Document 6.2.5.2 Part 5 Chapter 2 Project-wide (Combined) Effects of the Proposed Project** presents details of the 'project-wide' (combined) effects' of the project. |
| Policy SE-CBC-1 | Proposals must consider cross-border impacts throughout the lifetime of the proposed activity. Proposals that impact upon one or more marine plan areas or terrestrial environments must show evidence of the relevant public authorities (including other countries) being consulted and responses considered. | All works associated with the Proposed Project fall within the UK jurisdiction (12 NM). Given the distance of the Proposed Project from French waters (approximately 25 km), no significant transboundary effects have been identified. Predicted disturbance from the Proposed Project is short term and local and are therefore not anticipated to be sufficient to influence marine mammal receptors (highly mobile species) outside UK waters, and subsequently cause transboundary effects. |

# Appendix C

## Appendix Table C.1 Suffolk Minerals & Waste Local Plan (SMWLP) (Adopted 9 July 2020)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| Policy MP10: Minerals consultation and safeguarding areas | The County Council will safeguard:<br>a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha. The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development.<br>b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The MPA will advise the Local Planning Authority whether any proposed development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working. | The majority of the Suffolk Onshore Scheme lies within an Mineral Consultation Area (MCA) as highlighted in **Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment**.<br>Parts (a) and (b) of Policy MP10 are not applicable as the Proposed Project is not situated within a Minerals Safeguarding Area and is not within 250 m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction.<br>The only requirement of Policy MP10 that applies to the Proposed Project, due to its location within an MCA, is for the County Council to be consulted by the Districts on Town and Country Planning Act applications. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | District and Borough Councils should consult the County Council when a proposal falls within the Minerals Consultation Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response. Responsibility for any mitigation required falls on the development that receives planning permission last. | |

# Appendix Table C.2 Suffolk Coastal Local Plan (Adopted 23 September 2020)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| Policy SCLP3.3: Settlement Boundaries | Settlement Boundaries are defined on the Policies Map and apply to Major Centres, Market Towns, Large Villages and Small Villages. Land which is outside of Settlement Boundaries and which isn't allocated for development in the Local Plan and Neighbourhood Plans is defined as Countryside.<br>New development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan.<br>New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.<br>Proposals for new residential development outside of the Settlement Boundaries and outside of land which is allocated for development will be carefully managed in accordance with national planning policy guidance and the strategy for the Countryside.<br>Neighbourhood Plans can make minor adjustments to Settlement Boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall strategy and distribution as set out in this Local Plan. | The Proposed Project is a utility infrastructure development and is to be sited outside of the defined settlement boundaries. Policy SCLP3.3 seeks to prevent specifically "*new residential, employment and town centre development*" in the Countryside and therefore does not apply to the Proposed Project.<br>The Proposed Project has been subject to a comprehensive site selection and routeing process. A detailed summary of this process is available in **Application Document 7.3 Design Development Report.** |
| Policy SCLP3.4: Proposals for | In its role either as determining authority for development under the Town and Country Planning | |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| Major Energy Projects | Act, or as a consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plants and facilities. The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership, service providers, public bodies and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any Major Infrastructure Projects as outlined in **Table 3.6**.<br><br>Proposals for Major Energy Infrastructure Projects across the plan area and the need to mitigate the impacts arising from these will have regard to the following policy requirements:<br>a) Relevant Neighbourhood Plan policies, strategies and visions;<br>b) Appropriate packages of local community benefit to mitigate the impacts of disturbance experienced by the local community for hosting major infrastructure projects;<br>c) Community safety and cohesion impacts;<br>d) Requirement for a robust Environmental Impact Assessment;<br>e) Requirement for a robust Habitats Regulations Assessment; | **Application Document 5.1 Consultation Report** details engagement to date with East Suffolk District Council.<br><br>The requirements of Policy SCLP3.4 were addressed as follows:<br>a) Compliance with Neighbourhood Plan Policies considered in this document (see Table C.3).<br>b) Discussions on local community benefits with host authorities are ongoing<br>c) **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** presents the likely effects on health and wellbeing from social cohesion and community impacts and conclude that these will not be significant.<br>d) The Proposed Project has been subject to a robust EIA process, the outcome of which is set out in **Volume 6 Environmental Statement** of this DCO application. **Application Document 6.14 Environmental Scoping Report 2022** for the Proposed Project was submitted to the Planning Inspectorate on the 24 October 2022. The Planning Inspectorate provided a Scoping Opinion on behalf of the Secretary of State on 1 December 2022. The ES has been prepared in accordance with this opinion.<br>e) **Application Document 6.6 Habitats Regulations Assessment Report** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | f) Requirement for a robust Heritage Impact Assessment;<br>g) Requirement for robust assessment of the potential impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;<br>h) Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;<br>i) Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;<br>j) The development and associated infrastructure proposals will seek to deliver positive outcomes for the local community and surrounding environment;<br>k) Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;<br>l) Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;<br>m) Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and<br>n) Appropriate monitoring measures during construction, operating and decommissioning phases | potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment.<br>f) A Heritage Statement has been prepared and is available in Appendix D of this Planning Statement.<br>g) The potential impacts of the Suffolk Onshore Scheme on the Special Qualities of the AONB are addressed in Section 7.3 of **Application Document 7.1 Planning Statement.**This is supported by **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** provides a full assessment of landscape character effects of the Suffolk Onshore Scheme on the Natural Beauty indicators of the AONB.<br>h) **Application Document 6.2.5.1 ES Part 5 Project Wide Effects Chapter 1 Climate Change** sets out the potential climate hazards and impacts on the Proposed Project (Climate Change Resilience Assessment). The assessment concludes that, with mitigation measures in place, the likely significant effects of climate change on the Proposed Project are not significant. Flood mitigation measures are detailed in **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment**.<br>i) The assessment presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction, operation and decommissioning. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | to ensure mitigation measures remain relevant and effective | j) **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **Application Document 7.1 Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target. Section 5.3 of the Planning Statement sets out the benefits of the project which include employment generation and economic benefits, as well as well as ecological enhancements.<br>k) The wider socio-economic benefits of the Proposed Project are set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism.**<br>l) The **Outline LEMP** [**Application Documents 7.5.7.1 and 7.5.7.2**] as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** sets out the details of the landscape mitigation and enhancements that will be provided as part of the Proposed Project, including landscape and ecological reinstatement following construction.<br>m) The cumulative impacts resulting from the Proposed Project are assessed in the following documents:<br>• **Application Document 6.2.5.2 ES Part 5 Project-wide (Combined) Effects of the Onshore and Offshore Elements of the Proposed Project;**<br>• **Application Document Number 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects;** |

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| | | • **Application Document Number 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects.**<br><br>It is assessed that there are likely to be significant adverse effects during operation due to potential intra-project cumulative effect on some road and PRoW users due to significant visual amenity effects combined with minor noise and vibration, and traffic and transport effects.<br><br>During all stages of the Proposed Project, a number of potential inter-project cumulative effects as a result of the combination of the Proposed Project and other projects (most notably East Anglia ONE North and TWO Offshore Windfarms), in relation to landscape and visual matters and agriculture and soils, have also been identified.<br><br>n) Mitigation and monitoring measures during construction are set out in the following documents that will be secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**<br>• **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)**;<br>• **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**;<br>• **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**; |

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| | | • **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)**; |
| Policy SCLP4.5: Economic Development in Rural Areas | Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses, will be supported.<br>Proposals will be supported where:<br>a) They accord with the vision of any relevant Neighbourhood Plan in the area;<br>b) The scale of the enterprises accords with the Settlement Hierarchy;<br>c) The design and construction avoids, or adequately mitigates, any adverse impact on the character of the surrounding area and landscape, the AONB and its setting or the natural or historic environment;<br>d) Small scale agricultural diversification schemes make good use of previously developed land; and<br>e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns.<br><br>Proposals will be expected to provide additional community, cultural or tourism benefits where opportunities exist.<br>The delivery of new buildings, structures and infrastructure that the agricultural industry requires to grow, modernise and function efficiently will be supported. | The proposed Project will be a Major Energy Project that will help to grow renewable energy in the U.K, working towards the governments target of Net Zero by 2030 and to meet the growing demands of electricity. The Proposed Project will also, upgrade the existing electrical transmission network between East Anglia and the South East of England. Whilst not specifically an economic development, there are some socio-economic benefits associated with the Proposed Project as set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism.**<br><br>**Application Document 7.1 Planning Statement**, alongside this appendix, provides an assessment of the Proposed Project against the relevant Planning Policies set out in the Local Plans and Neighbourhood Plans.<br><br>**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Suffolk Onshore Scheme. The assessment concludes there would not be any significantly adversely affected designated landscapes within the landscape and visual study area arising from the Suffolk Onshore Scheme. |

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| | | Section 7.3 of **Application Document 7.1 Planning Statement** assesses the impact of the Proposed Project on the Suffolk and Heaths Area of Outstanding National Beauty. With the provision of the acid grassland, the Proposed Project seeks to further the purposes of the AONB in accordance with Section 85 of the Countryside and Rights of Way Act 2000 by improving the landscape, biodiversity and habitat provision and links between the community and the landscape. In addition, the Proposed Project will provide socioeconomic benefits to the area through the creation direct employment opportunities during the construction phase.<br><br>With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** presents the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme at Noise Sensitive Receiver (NSR) during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being |

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| | | employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br><br>**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** provides an assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Suffolk Onshore Scheme. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**. The assessments conclude that during construction, operation and decommissioning phases the effects on air quality, generated by the Onshore Scheme would be negligible and therefore not significant.<br><br>With regards to access, the assessment presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. The Suffolk Transport Assessment Note (TAN) (**Application Document 6.3.2.7.A Appendix 2.7.A Suffolk Transport Assessment No**te) concludes that the impacts of the Suffolk Onshore Scheme on the SRN would not be significant. Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1** |

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| | | **Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan- Suffolk**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| Policy SCLP7.1: Sustainable Transport | Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.<br>Development will be supported where:<br>a) Any significant impacts on the highways network are mitigated;<br>b) It is proportionate in scale to the existing transport network;<br>c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;<br>d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;<br>e) It is well integrated into and enhances the existing cycle network including the safe design and layout of | The assessment presented in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. The Suffolk TAN (**Application Document 6.3.2.7.A Appendix 2.7.A Suffolk Transport Assessment No**te) concludes that the impacts of the Suffolk Onshore Scheme on the Strategic Road Network would not be significant.<br>**Application Document 7.5.1.1 Construction Traffic and Management and Travel Plan** sets out a strategy for the management of construction traffic on the local highway network during construction, including measures to manage staff movements. During operation, the Suffolk Onshore Scheme will be manned by two operatives across the site and is likely to generate a low level of trips. |

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| | new cycle routes and provision of covered, secure cycle parking;<br>f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;<br>g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and<br>h) The cumulative impact of new development will not create severe impacts on the existing transport network.<br><br>Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.<br><br>Opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.<br><br>Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for: i) New large scale employment sites; j) Residential development of 80 or more dwellings; and k) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or road network. | Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice**, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan- Suffolk** and **Application Document 7.5.1.2 Outline Construction Traffic Management**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>With regards to intra-project cumulative effects, as reported in **Application Document Number 6.2.2.12 Part 2 Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects,** potential intra-project cumulative effect on some road and PRoW users is identified, due to significant visual amenity effects combined with minor noise and vibration and traffic and transport effects during operation.<br><br>With regards to intra-project cumulative effects (**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects)** no significant cumulative effects on traffic and transport receptors are expected as a result of construction traffic associated with the Onshore Scheme when combined with construction/ operational traffic associated with each of the other developments in |

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| | In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed. | isolation. In addition, no significant cumulative effects are expected when considering construction/ operational traffic associated with all committed developments combined on the same basis. In terms of PRoW closures/ diversions, these will be coordinated with other committed developments where necessary (as identified above) to reduce the potential for significant cumulative effects. Mitigation measures to avoid significant effects are set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk (Outline CTMTP – Suffolk)** and **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Outline PRoWMP – Suffolk)**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| Policy SCLP8.2: Open Space | The SCLP asserts that there will be a presumption against any development that involves the loss of open space or community sport and recreation facilities.<br><br>Proposals for development that results in the loss of open spaces will only be permitted in exceptional circumstances where:<br>a) The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit;<br>b) An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses;<br>Or | Section 7.14 of **Application Document 7.1 Planning Statement** provides an overview of open spaces that are located within or adjacent to the Order Limits of the Proposed Project. This assessment concludes that there will be no material impact or loss to the function or use of the spaces identified in Suffolk. Whilst there might be some short-term disturbance to PRoWs during construction, this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project.<br>Overall, there will be no permanent impact or loss of open space as a result of the Suffolk Onshore Scheme and therefore, Policy SCLP8.2 is not engaged. |

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| | c) The loss resulting from the proposed development will be replaced by equivalent or better provision in terms of quantity, quality and in a suitable location. | |
| Policy SCLP9.1: Low Carbon & Renewable Energy | The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below:<br>a) They can evidence a sustainable and, ideally, local source of fuel;<br>b) They can facilitate the necessary infrastructure and power connections required for functional purposes; and<br>c) They are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, the natural beauty and special qualities of the AONB, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.<br><br>The Council will support low carbon and renewable energy developments , with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria.Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan. When the technology is no longer | **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **Application Document 7.1 Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target. 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. Sea Link would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately net zero.<br>Section 9 of this Planning Statement sets out the overall planning balance for the Proposed Project, including the permanent residual significant adverse landscape and visual effects of the Suffolk Onshore Scheme. The Proposed Project would not therefore meet criterion c of Policy SCLP9.1 (criteria a and b are not relevant). However, the Proposed Project is nationally significant and to be treated as a development for which development consent is required (see Section 1 of this Planning Statement). As set out in NPS EN-1, in the event of a conflict between the NPS and a local development plan, the NPS prevails for the purpose of the SoS decision-making given the national significance of the infrastructure (paragraph 4.1.15). |

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| | operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition. | |
| Policy SCLP9.3: Coastal Change Management Area | The Coastal Change Management Area is identified on the Policies Map. Reputable and scientifically robust evidence that emerges over the lifetime of this plan which effects the delineation of the Coastal Change Management Area should be considered when applying this policy.<br><br>Planning applications for all development within and 30 metres landward of the Coastal Change Management Area and within and 30 metres landward of areas where the intent of management is to Hold the Line, identified on the Policies Map must be accompanied by a Coastal Erosion Vulnerability Assessment.<br><br>In areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences are likely to be adversely affected by development, a Coastal Erosion Vulnerability Assessment should be considered.<br><br>In parts of the Coastal Change Management Area expected to be at risk from change within a 20 year time horizon, only temporary development directly related to the coast, for example beach huts, cafes, car parks and sites used for touring caravan and camping will be permitted. | The Suffolk Landfall intersects with the Coastal Change Management Area.<br><br>The impacts from coastal geomorphological change and associated changes to transport sediment are assessed in **Application Document 6.2.4.2 Part 4 Offshore Scheme Chapter 1 Physical Processes,** which concludes that this impact would result in a minor effect (not significant) at the Suffolk landfall, during construction and operation, taking into account mitigation measures that have been incorporated into the project design to reduce physical processes effects. Throughout its operational lifetime, it is intended that the majority of the cable will be trenched into the seabed. Therefore, the presence of the cable will have no impact on bedload sediment transport processes and therefore, will not impact coastal geomorphology.<br><br>The Proposed Project comprises essential infrastructure. A robust site selection and routeing methodology has been followed in the project development as set out in **Application Document 7.3 Design Development Report** and **Application Document 6.2.1.3Part 1 Introduction Chapter 3 Main Alternatives Considered**. As a connection is required in the Sizewell area and the Coastal Management Change Area extends along a continuous stretch of coast from Bawdsey in the south to Dunwich River in the north, it has not been possible to avoid locating the landfall area outside the Coastal Management Change Area without a significantly longer and indirect |

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| | In parts of the Coastal Change Management Area expected to be at risk from change beyond a 20 year time horizon, other commercial and community uses will be permitted providing they require a coastal location and provide economic and social benefits to the local community.<br><br>Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works reflect the management approach for the frontage presented in the relevant Shoreline Management Plan and/or endorsed Coastal Strategy, and there will be no material adverse impact on the environment, including exacerbation of coastal squeeze. Proposals for new or replacement estuary defence schemes will only be permitted where it can be demonstrated that the works reflect the management approach for the frontage presented in the endorsed estuary plans/strategies, and there will be no material adverse impact on the environment, including exacerbation of coastal squeeze.<br><br>Essential infrastructure, including transport infrastructure, utility infrastructure and wind turbines will only be permitted in the Coastal Change Management Area where no other sites outside of the Area are feasible and there is a management plan in place to manage the impact of coastal change including their future removal and replacement. Planning permission for all development within the | route that would not be in accordance with National Grid's statutory duties.<br><br>Mitigation measures have been incorporated into the project design to reduce the physical processes effects of the Proposed Project so that they are not likely to be significant. These include commitments made within **Application Document 7.5.3.2 Appendix B Register of Environmental Actions and Commitments** and measures included within **Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |

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| | Coastal Change Management Area will be time-limited according to the risk identified in the Coastal Erosion Vulnerability Assessment. | |
| Policy SCLP9: Flood Risk | The Strategic Flood Risk Assessment should be the starting point in assessing whether a proposal is at risk from flooding.<br>Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios (taking climate change into consideration). This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; identification and provision of surface water exceedance routes; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere, including sewer flooding.<br><br>Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere. In this respect, single storey residential developments will not | Within the Suffolk Onshore Scheme boundary, the main sources of flood risk within the study area are the Hundred River and the River Fromus, with areas of Flood Zones 2 and 3 (medium to high risk) encroaching onto land within the Order Limits associated with these watercourses, as illustrated in **Application Document 6.4.2.4.2 Flood Risk Baseline.**<br><br>The Flood Risk Assessment (**Application Document 6.8 Flood Risk Assessment**) and supporting assessments and hydraulic modelling confirm that the Proposed Project, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Proposed Project, taking into account climate change. The surface water drainage design demonstrates that SuDS have been designed into the Proposed Project.<br><br>A sequential approach has been applied in selecting the land for the Proposed Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. Evidence of passing the Sequential Test and Exception Test is presented in **Application Document 6.8 Flood Risk Assessment** and Section 7.6 of the Planning Statement. |

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| | be permitted in areas of high risk of flooding within or outside Settlement Boundaries.<br><br>Developments are encouraged to include natural flood management measures that complement existing flood defences if pre-existing flood defences are in place, in the interests of integrated flood management. Any new flood risk measures that result in significant depreciation of natural capital will be required to create compensatory natural capital. | Commitment W12 of **Application Document 7.5.3.1 CEMP Appendix A CoCP** states that surface water drainage from permanent above ground infrastructure would be managed and treated using sustainable drainage systems (SuDS) in accordance with policy and guidance requirements of the relevant Lead Local Flood Authorities. These SuDS would be maintained over the lifetime of the Proposed Project. |
| Policy SCLP9.6: Sustainable Drainage Systems | Developments should use sustainable drainage systems to drain surface water. Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sqm of floorspace or on sites of 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Sustainable drainage systems should:<br>a) Be integrated into the landscaping scheme and green infrastructure provision of the development;<br>b) Contribute to the design quality of the scheme; and<br>c) Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible.<br><br>This should be complementary of any local designations such as Source Protection Zones. Runoff rates from new development must be restricted to greenfield runoff rates wherever possible. Where a site is previously developed, the proposed runoff rates should be restricted as close to the greenfield rates, or | Measures for mitigation of surface water flooding are covered in Sections 5.8 and 5.10 of **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment,** with further information provided within the FRA (**Application Document 6.8 Flood Risk Assessment**). The Saxmundham Converter Station and Friston Substation would be served with drainage systems that embed SuDS for attenuation of runoff to greenfield runoff rates, in line with the requirements of the receiving watercourse authorities, and provide treatment of runoff. The surface water drainage from permanent infrastructure would be managed using SuDS designed in accordance with the requirements of the Suffolk Flood Risk Management Strategy. |

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| | at the very minimum a betterment of at least 30% should be considered over the brownfield runoff rates.<br><br>No surface water connections should be made to the foul system and connections to the combined or surface water system should only be made in exceptional circumstances where there are no feasible alternatives. Foul and surface water flows should also be separated. | |
| Policy SCLP10.1: Biodiversity and Geodiversity | Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'. All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.<br><br>Proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with comprehensive evidence that the benefits of the | As set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity** the Proposed Project avoids and mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and landscaping/green infrastructure. The proposed planting design (as outlined in **Application Document 7.5.7.1 oLEMP – Suffolk**), secured by Requirement 6 of Schedule 3 of **Application** |

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| | proposal, in its particular location, outweighs the biodiversity loss. | **Document 3.1 draft DCO**, includes habitat creation, including balancing ponds around the Saxmundham Converter Station and Friston Substation. |
| | New development should provide environmental net gains in terms of both green infrastructure and biodiversity. Proposals should demonstrate how the development would contribute towards new green infrastructure opportunities or enhance the existing green infrastructure network as part of the development. New development must also secure ecological enhancements as part of its design and implementation, and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal. | As per 4.6 of NPS EN-1 biodiversity net gain is not a legal obligation for NSIPs and therefore the Proposed Project is not required to achieve 10% BNG. However, as detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units. Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. |
| | Where compensatory habitat is created, it should be of equal or greater size and ecological value than the area lost as a result of the development, be well located to positively contribute towards the green infrastructure network, and biodiversity and/or geodiversity and be supported with a management plan. | |
| | Where there is reason to suspect the presence of protected UK or Suffolk Priority species or habitat, applications should be supported by an ecological survey and assessment of appropriate scope undertaken by a suitably qualified person. If present, the proposal must follow the mitigation hierarchy in order to be considered favourably. Any proposal that adversely affects a European site, or causes significant | The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site. |

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| | harm to a Site of Special Scientific Interest, will not normally be granted permission.<br><br>Any development with the potential to impact on a Special Protection Area, Special Area for Conservation or Ramsar site within or outside of the plan area will need to be supported by information to inform a Habitat Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).<br><br>The Recreational disturbance Avoidance and Mitigation Strategy has been prepared to provide a mechanism through which impacts from increased recreation can be avoided and mitigated via financial contributions towards the provision of strategic mitigation. Where mitigation is proposed to be provided through alternative mechanisms, applicants will need to provide evidence to demonstrate that all impacts are mitigated for, including in-combination effects. Depending on the size and location of the development, additional measures such as Suitable Alternative Natural Green Spaces (SANGS) may be required as part of development proposals | **Application Document 6.6 Habitats Regulations Assessment Report** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment.<br><br>Following appropriate assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, it is concluded that the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>The Recreational Disturbance Avoidance and Mitigation Strategy relates to payments requested for development of one or more new dwellings and some tourism development, within a 13km zone of influence from designated sites (known as European Sites), on the Suffolk Coast. It is therefore not considered that this is applicable to the Proposed Project. |
| Policy SCLP10.3: Environmental Quality | Development proposals will be expected to protect the quality of the environment.<br><br>Developments should seek to secure improvements in relation to the following: | a) **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** provide assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Suffolk Onshore Scheme. An assessment of |

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| | a) Air quality, and the impact on receptors in Air Quality Management Areas;<br>b) Soils and the loss of agricultural land;<br>c) Land contamination and its effects on sensitive land uses;<br>d) Water quality and the achievement of Water Framework Directive objectives;<br>e) Light pollution; and<br>f) Noise pollution.<br><br>Proposals should seek to secure improvements in relation to the above where possible.<br><br>The cumulative effect of development, in this regard, will be considered. | construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology.** The assessments conclude that during construction, operation and decommissioning phases the effects on air quality, generated by the Onshore Scheme would be negligible and therefore not significant.<br>b) As set out in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils** although the Proposed Project aims to reinstate the affected land to its pre-construction state. The Suffolk Onshore Scheme would require a total permanent land take of 11.59 ha, of which 11.45 ha is BMV land (ALC Grades 2 and 3a). Measures that that have been incorporated are:<br>• Sensitive routeing and siting of infrastructure and temporary works;<br>• Rationalisation of the design to minimise permanent land take requirements;<br>• The temporary nature of many of the construction activities and the subsequent restoration of the land and its return to the preconstruction use is likely to result in the avoidance of long-term impacts on agricultural and soil receptors;<br>• Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**, |

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| | | as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br>• This is also supported by **Application Document 6.3.2.6.A Predictive Agricultural Land Classification Report – Suffolk** and **Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk**., as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br>c) Baseline assessments and preliminary contamination risk assessments (PRA) have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure of existing ground contamination through ground disturbance for both the Suffolk during construction and decommissioning. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk have been identified, further assessment has identified a very low/low risk to sensitive receptors. With good practice measures, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**, secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** the impacts from existing ground contamination on construction workers is considered negligible.<br>d) The Water Framework Directive (WFD) assessment undertaken in **Application Document 6.9 Water** |

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| | | **Framework Directive Assessment documents** for the proposed reinforcement. The assessment has followed a staged approach in accordance with Planning Inspectorate WFD Advice, updated in September 2024, and has been informed by extensive engagement with the Environment Agency. The assessment concludes that the Proposed Project is compliant with the objectives of the WFD and on this basis, no further assessment is proposed.<br><br>In terms of lighting, as set out in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**, associated lighting at the Saxmundham Converter Station site would be visible across part of the horizontal extent of the view but would be on for occasional and short periods of time. At Viewpoints 1, 2, 3 4,5, 6a and 6b, 8a and 8b, 19 associated lighting is expected to be localised and this would be visible across a considerable part of the horizontal extent of the view largely associated with the construction compounds. At Viewpoint 20 Associated lighting is expected to be localised and this would be visible across part of the horizontal extent of the view in the context of the southern settlement edge of Saxmundham. At Viewpoints 15 and 21 Associated lighting is expected to be localised which would be visible across a considerable part of the horizontal extent of the view in the context of the B1119 road corridor. At other visual receptors, associated lighting is likely to be largely screened by intervening vegetation. |

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| | | e) With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise** present the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br>f) The cumulative impacts resulting from the Proposed Project are assessed in the following documents:<br>• **Application Document 6.2.5.2 Part 5 Project-wide (Combined) Effects of the Proposed Project;**<br>• **Application Document Number 6.2.2.12 Suffolk Onshore Scheme Intra-Project Cumulative Effects;** |

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| | | • **Application Document Number 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.** |
| Policy SCLP10.4: Landscape Character | Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence. Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:<br>a) The special qualities and features of the area;<br>b) The visual relationship and environment around settlements and their landscape settings;<br>c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;<br>d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and<br>e) The growing network of green infrastructure supporting health, wellbeing and social interaction.<br><br>Development will not be permitted where it will have a significant adverse impact on rural river valleys, historic park and gardens, coastal, estuary, heathland and other very sensitive landscapes. Proposals for development will be required to secure the preservation and appropriate restoration or | Effects on landscape character as a result of the Suffolk Onshore Scheme are presented in **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**. The assessment has taken account of the Suffolk Landscape Character Assessment (2018) and the Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators (published by Suffolk and Essex Coast and Heaths National Landscape Partnership in 2016).<br>Section 7.3 of the Planning Statement explains that exceptional circumstances exist to justify development in the AONB. It sets out that the Suffolk Onshore Scheme is not likely to detract from the natural beauty and the special qualities of the AONB.<br><br>The landscape and visual assessment of the Suffolk Onshore Scheme indicates that the construction phase would result in significant adverse landscape and visual effects, especially due to large construction compounds, drilling rigs at landfalls, presence of near shore vessels off the coast, security fencing and hoarding. These effects are however temporary. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that limited and localised significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual |

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| | enhancement of natural, historic or man made features across the plan area as identified in the Landscape Character Assessment, Settlement Sensitivity Assessment and successor landscape evidence.<br><br>Development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, that cannot be adequately mitigated. Development within the Area of Outstanding Natural Beauty, or within its setting, will be informed by landscape and visual impact assessment to assess and identify potential impacts and to identify suitable measures to avoid or mitigate these impacts. Planning permission for major development in the Area of Outstanding Natural Beauty will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, subject to the considerations set out in the National Planning Policy Framework.<br><br>Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network. Development proposals which have the potential to impact upon the Area of Outstanding Natural Beauty or other sensitive landscapes should be informed by landscape appraisal, landscape and visual impact assessment and landscape mitigation. | effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in paragraphs 5.10.5 and 5.10.13 of NPS EN-1. This is considered in the overall planning balance discussed in Section 9 of the Planning Statement.<br><br>Effects of lighting on landscape character and visual receptors as a result of the Suffolk Onshore Scheme are presented in **Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.2.1D Appendix 2.1.D Visual Amenity Baseline and Assessment.** During operation, associated lighting is expected to be limited and it is not expected that this lighting would affect the Landscape Character Area due to distance and intervening vegetation.<br><br>In as set out in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment**, associated lighting at the Saxmundham Converter Station site would be visible across part of the horizontal extent of the view but would be on for occasional and short periods of time. At Viewpoints 1, 2, 3 4,5, 6a and 6b, 8a and 8b, 19 associated lighting is expected to be localised and this would be visible across a considerable part of the horizontal extent of the view largely associated with the construction compounds. At Viewpoint 20 Associated lighting is expected to be localised and this would be visible across part of the horizontal extent of the view in the context of the southern settlement edge of Saxmundham. At Viewpoints 15 and 21 Associated lighting is expected to be localised which would be visible across a considerable part of the horizontal extent of the view in the context of the B1119 road |

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| | Proposals for development should protect and enhance the tranquillity and dark skies across the plan area. Exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character. | corridor. At other visual receptors, associated lighting is likely to be largely screened by intervening vegetation. |
| Policy SCLP10.5: Settlement Coalescence | Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements. Neighbourhood plans may include policies addressing local issues related to settlement coalescence. | The Proposed Project will not lead to the coalescence of settlements through a reduction in openness and space. At Year 15 of operation, significant effects arising from the Suffolk Onshore Scheme would remain on Landscape Character Area (LCA) 1. By year 15, the proposed landscape mitigation planting around the Suffolk Onshore Scheme would provide partial screening and landscape integration within the immediate landscape context. The impact on the LCA would be localised (**Application Document 6.3.2.1.C Appendix 2.1.C Landscape Designation and Landscape Character Assessment).** |
| Policy SCLP11.1: Design Quality | The Council will support locally distinctive and high quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means. In so doing, permission will be granted where proposals:<br>a) Support inclusive design environments which are legible, distinctive, accessible, comfortable, and safe, and adopt the principles of dementia friendly design;<br>b) Demonstrate a clear understanding of the character of the built, historic and natural environment and use this understanding to complement local character and | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset.<br><br>As set out in **Application Document 7.3 Design Development Report**, design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, |

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| | distinctiveness through robust evidence, informed sources and site specific context and analysis;<br>c) Respond to local context and the form of surrounding buildings in relation to the following criteria:<br>i. the overall scale and character should clearly demonstrate consideration of the component parts of the buildings and the development as a whole in relation to its surroundings;<br>ii. the layout should fit in well with the existing neighbourhood layout and respond to the ways people and vehicles move around both internal and external to existing and proposed buildings;<br>iii. the height and massing of developments should be well related to that of their surroundings;<br>iv. there should be a clear relationship between buildings and spaces and the wider street scene or townscape; and<br>v. high quality materials appropriate to the local context should be used;<br>d) Take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site;<br>e) Protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development;<br>f) Take into account the need to promote public safety and deter crime and disorder through well lit | functional requirements and operational and maintenance requirements, amongst other things.<br><br>An explanation of how the design of the converter station and substation site responds to its wider context is presented in **Application Document 7.11.1 Design Approach Document – Suffolk.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel.<br><br>The overall objective of the landscape design is to integrate the Suffolk into its landscape setting and to avoid or minimise adverse landscape and visual effects as far as practicable. Key objectives of the landscape design in Suffolk include:<br>• To replace habitat loss as a result of construction and enhance habitats through the creation of woodland, hedgerow, grassland and riparian habitats.<br>• To extend and enhance the woodland planting along the western and southern boundaries with native woodland planting to provide structural screening to the Saxmundham Converter Station.<br>• To introduce native hedgerow and tree planting along sections of the B1119 to create |

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| | neighbourhoods and development of public spaces that are overlooked;<br>g) Create permeable and legible developments which are easily accessed, throughout the site and connections outside the site, and used by all, regardless of age, mobility and disability;<br>h) Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm and avoid the perception of a car dominated environment. In doing so, proposals will be expected to prioritise safe and convenient pedestrian and cycle movement;<br>i) Include hard and soft landscaping schemes to aid the integration of the development into its surroundings;<br>j) Ensure that the layout and design incorporates adequate provision for the storage and collection of waste and recycling bins in a way which does not detract from the appearance of the development; an<br>k) Utilise measures that support resource efficiency | vegetative layers within the landscape and partially screen views of the Saxmundham Converter Station, whilst maintaining some views of the planted edge of Saxmundham.<br>• To strengthen areas of existing planting to provide greater biodiversity and screening function around the River Fromus bridge.<br>With regards to point (f), during construction Lighting, gates and additional security measures would be provided, for the safety of operatives and to improve site security.<br>With regards to point (h), where PRoW diversions are required, these have been designed and co-ordinated with other projects in this area (e.g. Lion Link) to minimise additional journey distances, re-join existing routes and improve route connectivity. The permanent diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to fully consider the long-term future of the site and to avoid the need for subsequent diversions. Corridors of land have also been safeguarded within the Order Limits (by keeping these clear of potential obstructions) so that new PRoW routes can be provided by other projects when these come forward to enhance the network/open access across the countryside, which is an approach welcomed by SCC. Therefore, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. |

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| Policy SCLP11.2 Residential Amenity | When considering the impact of development on residential amenity, the Council will have regard to the following:<br>a) Privacy/overlooking;<br>b) Outlook;<br>c) Access to daylight and sunlight;<br>d) Noise and disturbance;<br>e) The resulting physical relationship with other properties;<br>f) Light spillage;<br>g) Air quality and other forms of pollution; and<br>h) Safety and security.<br>Development will provide for adequate living conditions for future occupiers and will not cause an unacceptable loss of amenity for existing or future occupiers of development in the vicinity. | Visual effects as a result of the Suffolk Onshore Scheme are considered in **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment.** At Year 15 of operation and maintenance, significant visual effects from the Suffolk Onshore Scheme would remain. The proposed landscape mitigation planting around the Suffolk Onshore Scheme would provide partial screening and landscape integration within the immediate landscape context. The planting around the Saxmundham Converter Station would have matured and some would be located on bunding, providing some additional height and screening benefit. This would aid the softening of views in the direction of the permanent infrastructure; however, the upper extents of the Saxmundham Converter Station would remain visible to the residential receptors and a noticeable change in the composition of the view would remain, due to the scale and massing of the infrastructure. The planting associated with the River Fromus bridge would create new green infrastructure links and assist in partially restoring the permanent tree loss along the River Fromus including replacement of plantation woodland with native woodland.<br><br>With regards to noise, **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** presents the assessments of the likely significant noise and vibration effects that could result from the Suffolk Onshore Scheme. The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. |

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| | | With the implementation of design measures, along with other control measures, potential significant adverse effects of the Suffolk Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR and Suffolk due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life.<br><br>The visual assessment presented in **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment** and summarised in this chapter, has assessed the likely significant effects on visual amenity from the construction, operation and maintenance of the Proposed Project. For the Suffolk Onshore Scheme, the associated lighting (controlled manually as required during periods of low light or darkness) is expected to be limited and is not anticipated to be apparent within the view due to distance and intervening vegetation.<br><br>**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** provide assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Suffolk Onshore Scheme. An |

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| | | assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment** and **Methodology and Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology.** The assessments conclude that during construction, operation and decommissioning phases the effects on air quality, generated by the Onshore Scheme would be negligible and therefore not significant. |
| Policy SCLP11.3: Historic Environment | All development proposals which have the potential to impact on heritage assets or their settings should<br>• be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise. Pre-application consultation with the Council is encouraged to ensure<br>• the scope and detail of a Heritage Impact Assessment or Archaeological Assessment is sufficient. The level of detail of a Heritage Impact Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets affected. | **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. The assessment is considered to be proportionate to the Proposed Project. |
| Policy SCLP11.4: Listed Buildings | Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported where they:<br>a) Demonstrate a clear understanding of the significance of the building and its setting alongside an | The Proposed Project does not include any proposals to alter, extend or change the use of any listed buildings.<br><br>**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid |

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| | assessment of the potential impact of the proposal on that significance;<br>b) Do not harm the character of the building or any architectural, artistic, historic, or archaeological features that contribute towards its special interest;<br>c) Are of an appropriate design, scale, form, height, massing and position which complement the existing building;<br>d) Use high quality materials and methods of construction which complement the character of the building;<br>e) Retain the historic internal layout of the building; and f) Remove existing features that detract from the building to enhance or better reveal its significance. | has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets<br><br>The Heritage Statement (**Appendix E of Application Document 7.1 Planning Statement**) concludes that the Proposed Project would not result in substantial harm to any listed buildings. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm to 2 designated heritage assets.<br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of **Application Document 7.1 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| Policy SCLP11.5: Conservation Areas | Development within, or which has potential to affect the setting of, Conservation Areas will be assessed against the relevant Conservation Area Appraisals and Management Plans and any subsequent additions or alterations. Developments should be of a particularly | **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid has undertaken an iterative design process which |

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| | high standard of design and high quality of materials in order to preserve or enhance the character or appearance of the area.<br><br>Proposals for development within a Conservation Area should:<br>a) Demonstrate a clear understanding of the significance of the conservation area alongside an assessment of the potential impact of the proposal on that significance;<br>b) Preserve or enhance the character or appearance of the conservation area;<br>c) Be of an appropriate design, scale, form, height, massing and position;<br>d) Retain features important to settlement form and pattern such as open spaces, plot divisions, position of dwellings, hierarchy of routes, hierarchy of buildings, and their uses, boundary treatments and gardens; and<br>e) Use high quality materials and methods of construction which complement the character of the area.<br>Proposals for development which affect the setting of a Conservation Area should be considered against criteria a), c) and e) above. | responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>The majority of the designated assets affected by the Suffolk Onshore Scheme are located within the settlement of Saxmundham, a Conservation Area located west of the Order Limits for the Suffolk Onshore Scheme. As a Conservation Area containing a number of Grade II* listed buildings, including the Church of St John the Baptist, the settlement and its associated assets are considered to be of high value. The majority of assets within the Conservation Area are screened from the Saxmundham Converter Station by the topography as well as the intervening built environment. However, visualizations which illustrate the level of visual change when approaching from the south (**Application Document 6.4.2.1.10-B Representative Viewpoint 2**) confirm that Saxmundham Converter Station and the permanent access over the River Fromus would be visible. This would not result in change to the heritage value of the conservation area, but it would constitute change to a viewpoint of historical importance that contributes to the sense of arrival to the conservation area. Recognising that the change is to the experience of a view and not to the heritage value of the conservation area, the impact is assessed to be small resulting in a moderate adverse effect, which is significant. |

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| Policy SCLP11.7: Archaeology | An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.<br><br>Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of the archive is more appropriate.<br><br>Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported. | Mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.1 Suffolk Onshore oWSI (Draft)** and include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets.<br><br>**Application Document 6.2.4.6 Part 4 Offshore Scheme Chapter 6 Marine Archaeology** presents information about the environmental assessment of the likely significant marine archaeological effects that could result from the Proposed Project. This chapter is supported by **Application Document 6.3.4.6A Part 4 Offshore Scheme Appendix 6A Marine Archaeological Technical Report,** which outlines known and potential marine heritage assets within the study area (comprising a 100m buffer around the extent of the Offshore Scheme's Order Limits) and assesses the significance and sensitivity of known and potential marine heritage assets.<br><br>The assessment presented in **Application Document 6.2.4.6 Part 4 Offshore Scheme Chapter 6 Marine Archaeology** concludes that, with the implementation of mitigation measures (summarised in sections 6.7 and 6.10 of the chapter), the residual effects of all potential impacts should be reduced to between negligible adverse and minor beneficial (not significant). |

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| | | Details regarding conservation are presented in section 1.11 of the Outline WSI (**Application Document 7.5.5 Outline Offshore Written Scheme of Investigation (WSI)**). |
| Policy SCLP11.6: Non Designated Heritage Assets | Proposals for the re-use of Non-Designated Heritage Assets which are buildings or structures will be supported if compatible with the elements of the fabric and setting of the building or structure which contribute to its significance. Applications, including those for a change of use, which result in harm to the significance of a Non-Designated Heritage Asset will be judged based on the balance of the scale of any harm or loss, and the significance of the heritage asset. In considering proposals which involve the loss of a non-designated heritage asset, consideration will be given to: a) Whether the asset is structurally unsound and beyond technically feasible and economically viable repair (for reasons other than deliberate damage or neglect); or b) Which measures to sustain the existing use, or find an alternative use/user, have been fully investigated. Neighbourhood Plans can identify Non-Designated Heritage Assets. However, the protection afforded to these should be no more than that provided to Non-Designated Heritage Assets protected by this policy. Buildings or structures identified as Non-Designated Heritage Assets should at least meet the Council's criteria for identifying Non-Designated Heritage Assets. | The Proposed Project does not include any proposals for the re-use or change of use of Non-designated heritage assets. **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets. |

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| Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest | Within the plan area 7 parks are included in the National Register of Parks and Gardens of Special Historic Interest compiled by Historic England and have the status of Designated Heritage Assets. Development proposals affecting these assets will be considered in relation to the policy on Designated.<br><br>The delineated boundary of each of these locally listed historic parklands includes the area currently forming the visual extent of the parkland as well as any additional areas that historically formed part of the extent of the parkland and which continue to display the remnants of the former parkland Heritage Assets contained in the National Planning Policy Framework and guidance contained in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document).<br><br>East Suffolk Council will encourage the preservation and enhancement of these parks and gardens of historic interest and their surroundings. Applications for planning permission will be permitted where the development proposal will not have a materially adverse impact on the character, features or immediate setting of the delineated park or garden and which have due regard to the additional advice and guidance in Supplementary Planning Guidance SPG6 (or any subsequent Supplementary Planning Document). | As set out in **Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage,** there are no Registered Parks and Gardens within the Study Area used to inform the ES Assessment, or within the wider Study Area used to assess the potential for impacts on setting.<br><br>While not designated, the former parkland associated with Hurts Halls has been assessed. The proposed Saxmundham Converter Station is likely to be perceptible in views from within the gardens of Hurts Hall. This would represent a new built form into the wider setting of the hall, and would introduce a prominent industrial feature into its setting that would be incongruous with its current agricultural character. This impact would result in a noticeably different setting for the hall and would result in a moderate adverse effect, which is significant. The Heritage Statement concludes that the effect can be reasonably equated with less than substantial harm.<br><br>The overall objective of the landscape design is to integrate the Suffolk into its landscape setting and to avoid or minimise adverse landscape and visual effects as far as practicable. Key objectives of the landscape design in Suffolk include:<br><br>• To replace habitat loss as a result of construction and enhance habitats through the creation of woodland, hedgerow, grassland and riparian habitats.<br><br>• To extend and enhance the woodland planting along the western and southern boundaries with native woodland planting to provide |

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| | Proposals affecting or within the designated and non-designated parks and gardens will be required to be accompanied by landscape design and management proposals, to ensure a high level of design, mitigation and enhancement is achieved. | structural screening to the Saxmundham Converter Station.<br>• To introduce native hedgerow and tree planting along sections of the B1119 to create vegetative layers within the landscape and partially screen views of the Saxmundham Converter Station, whilst maintaining some views of the planted edge of Saxmundham.<br>• To strengthen areas of existing planting to provide greater biodiversity and screening function around the River Fromus bridge. |

# Appendix Table C.3 Saxmundham Neighbourhood Plan 2022-2036 (Made July 2023)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| SAX1: General design principles | The design of all new development in Saxmundham should reflect the town's local distinctiveness and character and seek to enhance its quality. Proposals should have regard to the advice contained within the Design Guidelines for the Neighbourhood Plan area as set out in Appendix E.<br>Proposals that incorporate eco-friendly, innovative or contemporary designs whilst respecting the architectural heritage and character of the area will be supported Proposals for new development should accord with the following criteria, as appropriate:<br>a. Respect the existing settlement pattern in order to preserve its character.<br>b. Retain existing connections and ensure new connections integrate with existing paths, streets, circulation networks, as well as natural features such as tree groups, hedgerows, and public rights of way.<br>c. Reinforce the established character of streets, greens, and spaces, where this provides a positive impact.<br>d. Harmonise and enhance the existing settlement in terms of physical form and architecture.<br>e. Retain existing natural and historic features within the new development.<br>f. Respect surrounding buildings in terms of scale, height, form and massing. | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset.<br><br>Design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). These are set out in:<br>• **Application Document 7.11.1 Design Approach Document – Suffolk**<br>• **Application Document 7.12.1 Design Principles – Suffolk**<br>• **Application Document 7.11.2 Design Approach Document – Kent**<br>• **Application Document 7.12.2 Design Principles - Kent.**<br>In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things which impact on the functional and operational design requirements. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | g. Adopt contextually appropriate materials and details.<br>h. Incorporate necessary services and drainage without causing harm to retained features.<br>i. Ensure all component elements of a development, e.g., buildings, landscapes and access routes, parking, open space, are well related to each other.<br>j. Enable and support healthy lifestyles, especially where this would address health and well-being needs<br>Consideration should be given to the specific guidance contained in the policies for the relevant Opportunity Zones. See also Policy SAX10 which relate to the Conservation Area. | The site-specific design principles for the converter station sites in Suffolk provide guiding principles for the detailed design for these elements of the Proposed Project. As specified in Requirement 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for confirmation that they are in general accordance with the site-specific design principles.<br><br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide oversight of the ongoing design process and delivery and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | An explanation of how the design of the converter station site responds to its wider context is presented in **Application Document 7.11.1 Design Approach Document – Suffolk.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel. |
| SAX6: Public Rights of Way | Existing Public Rights of Way, including bridleways and footpaths, should be protected and enhanced to promote walking and cycling. Enhancement can take the form of new routes, connections, improved surfaces and/or signage increasing access to the countryside and connectivity between parts of the town. Where new routes are to be provided and existing routes enhanced, careful consideration should be given to ensure their safety and attractiveness, for all users and for adjacent occupiers. Proposals should seek to minimise light pollution whilst remaining safe and attractive to users. Public Rights of Way should be retained, except where it can be demonstrated that there is strong community support for it to be re-routed. Where Public Rights of Way are to be unavoidably impacted or lost, appropriate diversions or new routes will be provided that are safe and convenient for users. | **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** assess the likely impacts of the Suffolk Onshore on PRoW. It is expected that there will be some minor to moderate adverse effects on PRoW as a result of construction. As a result, mitigation and management measures have been devised to avoid and/or reduce the adverse effects on PRoW, which are set out in **Application Document 7.5.9.1 Outline PRoWMP – Suffolk**, and secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. In addition, National Grid has sought to avoid future PRoW disturbance with the siting of the Saxmundham Converter Station. **Application Document 7.10 Coordination Document** Appendix A NGV Coordination Masterplan demonstrates how up to three converter stations could be developed, taking account of the likely phasing of works and the location of construction compounds, and the strategy for the retention of PRoW. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| SAX10: Historic town centre and Conservation Area | The special character of Saxmundham Conservation Area and its setting will be preserved and enhanced. This will be achieved by:<br>…Protecting the setting of the Conservation Area from development which adversely affects views into or out of the Conservation Area<br><br>All proposals should have regard to the advice contained within the Design Guidelines and Codes for the Neighbourhood Plan Area as set out in Appendix E and where relevant the Concept Masterplan for the High Street (Appendix F). | **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Suffolk Onshore Scheme. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment, with consideration to the Saxmundham Neighbourhood Plan. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br><br>Details regarding conservation are presented in section 1.11 of the Outline WSI (**Application Document 7.5.5 Outline Offshore Written Scheme of Investigation (WSI)**). |
| SAX11: Non-designated Heritage Assets | The following historic buildings and features (figure 21 and 22) are identified as Non-Designated Heritage Assets due to their locally important character and historic features:<br>1. The United Reformed Church, Chapel Road including its graveyard.<br>2. The Old Fire Station, Rendham Road.<br>3. Toll Gate Cottage, North Entrance.<br>4. The Layers.<br>5. Milestone on the B1121. | **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets. The Heritage Statement concludes that the Onshore Scheme would result in less than substantial harm to 8 non-designated heritage assets of negligible value.<br><br>The Heritage Statement (Appendix D of this Planning Statement) concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | 6. The pillbox in the Memorial Field.<br>7. The War Memorial in Fromus Square.<br>8. The Town Pump.<br>9. The Gannon Rooms.<br>10.The Water Tower, Rendham Road.<br>11.The Telephone Exchange, High Street.<br>12.Victorian Post Box at the Railway Station.<br>13.Saxmundham Goods Shed.<br>14.Victorian Post Box at South Entrance.<br>15.George V Post Box at North Entrance.<br>Development proposals affecting these non-designated heritage assets will be judged having regard to the scale of any harm or loss to their significance which may include its setting and relationship to its immediate surroundings and the contribution it makes to the character of the local area. | Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to three designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality and one designated heritage asset. In accordance with the NPS EN-1 paragraphs 5.9.32 and 5.9.33, and taking into account of the principles set out in NPS EN-1 paragraphs 4.2.16 and 4.2.17, the substantial public benefits and need for the Proposed Project, as set out in Section 5 of the Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| SAX12: Gateways, views and the landscape setting of Saxmundham | The visual scenic value of the landscape and countryside in the parish outside of the defined settlement boundary will be protected from development that may adversely affect this character. The existing clear landscape break that physically separates different settlements shall be maintained in order to prevent coalescence and loss of individual settlement distinctiveness and identity.<br>Development proposals within or which would affect the following important local views should take account of the view concerned. Developments, which would have an unacceptable adverse impact on the landscape or character of the view concerned, will not be supported. | **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Suffolk Onshore Scheme. The assessment concludes there would not be any significantly adversely affected designated landscapes within the landscape and visual study area arising from the Suffolk Onshore Scheme. Landscape proposals have responded to the design of the Proposed Project throughout its development and embedded mitigation measures have been incorporated within the design wherever possible. **Application Document 7.5.7.1 Outline Landscape and Ecological** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | 1. View from the B1121 looking across to Hurts Hall and St John's Church.<br>2. View from the high point of The Layers looking across the River Fromus to Hurts Hall.<br>3. View along Chantry Road towards St John's Church.<br>4. View from Albion Street across the town to Church Hill.<br>5. View towards the town from the B1119 (Leiston Road).<br>6. View to towards the open countryside from South Entrance. | **Management Plan (oLEMP) – Suffolk** provides detail on landscape proposals, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |
| SAX13 Protection and enhancement of natural assets | Development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors. Proposals should retain existing features of biodiversity value, associated with the Rolling Estate Claylands and Rolling Estate Sandlands Landscape Character types, where possible to do so, (including ponds, trees (including veteran trees), woodland, hedgerows, and verges).<br>Development proposals will be supported where they provide a minimum 10 per cent net gain in biodiversity through, for example:<br>a. The creation of new natural habitats.<br>b. The planting of additional trees and hedgerows.<br>c. The restoration and reparation of fragmented ecological networks.<br>Development proposals should conform to the mitigation hierarchy and seek initially to retain existing features and avoid loss or damage of biodiversity. Where loss or | The Proposed Project will not impact on Rolling Estate Claylands and Rolling Estate Sandlands Landscape Character type.<br>The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft DCO**.<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where development proposals cause damage to identified natural features, wildlife corridors around the interruption will be constructed.<br><br>Proposals for new buildings (including non-residential development) should incorporate measures to protect and enhance wildlife species including the incorporation of wildlife friendly measures e.g., bat, swallow and swift boxes, hedgehog doors and insect bricks etc, new garden hedgerows and trees. Consideration should also be given to the use of Sustainable Drainage Systems (SuDS) which can provide considerable benefits to wildlife.<br><br>Proposals to enhance and increase the biodiversity of important spaces, including green spaces will be supported as will proposals to restore or enhance traditional hedgerows in the parish. | Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.1 oLEMP – Suffolk**), secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, includes habitat creation, including balancing ponds around the Saxmundham Converter Station and balancing ponds around the Minster Converter Station and Substation and the creation of scrapes in various locations along the River Stour.<br><br>As per 4.6 of NPS EN-1 biodiversity net gain is not a legal obligation for NSIPs and therefore the Proposed Project is not required to achieve 10% BNG. However. as detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, the Suffolk Onshore Scheme will result in a Net Gain for hedgerow units and watercourse units and a net loss for area units.<br><br>Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies.<br><br>. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | Measures for mitigation of surface water flooding are covered in Sections 5.8 and 5.10 of **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment,** with further information provided within the FRA (**Application Document 6.8 Flood Risk Assessment**). The Saxmundham Converter Station and Friston Substation would be served with drainage systems that embed SuDS for attenuation of runoff to greenfield runoff rates, in line with the requirements of the receiving watercourse authorities, and provide treatment of runoff.<br><br>The Order Limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA and Alde-Ore Estuary SPA/Ramsar site.<br><br>**Application Document 6.6 Habitats Regulations Assessment Report** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment.<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by Requirement 6 of Schedule 3 **of Application** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | | **Document 3.1 draft DCO**, it is concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary. |
| SAX15: Green Spaces | The following are identified as Local Green Spaces (figure 25) where any proposals will be judged against the requirements which rule out development unless there are very special circumstances:<br>1. The Memorial Field.<br>2. Carlton Park sports and recreation ground.<br>3. Seaman Avenue Playground.<br>4. Chantry Road Playground.<br>5. Thurlow Close Playground and adjacent green area.<br>6. The Community Garden at the Fromus Centre off Seaman Avenue.<br>7. Garden of Sax'cess House.<br>8. The Gull Path.<br>9. Saxon Road Allotments.<br>10.Fromus Green and play area.<br><br>Suitable Alternative Natural Greenspace (SANG)<br>Land east of the Railway line and to the south of Saxmundham, including land known as The Layers is identified as an area of open space and SANG, in connection with the South Saxmundham Garden Neighbourhood which will serve to meet the informal day to day recreational needs of both the new Garden Neighbourhood and the existing community whilst | A stated in Section 7.14 of **Application Document 7.1 Planning Statement**, the Proposed Project has taken a precautionary approach to the identification of potential open space. There will be no material impact or loss to the function or use of the spaces identified in Suffolk. Whilst there might be some short-term disturbance during construction this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. Overall, there will be no material permanent impact or loss of open space.<br><br>The Order Limits do not fall within and will not impact a Local Green Space identified in figure 25 of the Saxmundham Neighbourhood Plan. Therefore, policy SAX15 is not engaged.<br><br>Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan (PRoWMP) – Suffolk.** |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | allowing for the retention of the existing uses of the land where it complements the delivery of the open space and the SANG, The location, design and access of the proposed SANG should take into account the purpose of the SANG, the need for easy and safe access to it together with potential impacts on landscape, nature conservation and heritage. | |

# Appendix Table C.4 Kent Minerals and Waste Local Plan 2013-30 (Adopted September 2020)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy CSM 5 Land-won Mineral Safeguarding | Economic mineral resources are safeguarded from being unnecessarily sterilised by other development in designated Mineral Safeguarding Areas. | The Order limits are not located within a Mineral Safeguarding Area, as set out within the Kent Minerals and Waste Local Plan. |
| Policy CSW 3 Waste Reduction | All new development should minimise the production of construction, demolition and excavation waste. New development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed. | Site waste shall be managed in a structured and auditable manner in accordance with the agreed site and waste management plan (SWMP), from the commencement of the Proposed Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. Further details on Construction Waste are found in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** |
| Policy DM 7 Safeguarding Mineral Resources | Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding, (106) where it is demonstrated that either:<br>1. the mineral is not of economic value or does not exist; or<br>2. that extraction of the mineral would not be viable or practicable; or | The Order limits are not located within a Mineral Safeguarding Area, as set out within the Kent Minerals and Waste Local Plan. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | 3. the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or<br>4. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or<br>5. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or<br>6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or<br>7. it constitutes development on a site allocated in the adopted development plan where consideration of the above factors (1-6) concluded that mineral resources will not be needlessly sterilised. | |

# Appendix Table C.5 Thanet Local Plan (Adopted 9 July 2020)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy SP24 – Development in the Countryside | Development on non-allocated sites in the countryside will be permitted for either:<br>1) the growth and expansion of an existing rural business;<br>2) the development and diversification of agricultural and other land based rural businesses;<br>3) rural tourism and leisure development;<br>4) the retention and/or development of accessible local services and community facilities; or<br>5) the redevelopment of a brownfield site for a use that is compatible with its countryside setting and its surroundings.<br>Isolated homes sites in the countryside will not be permitted unless they fall within one of the exceptions identified in the National Planning Policy Framework.<br>All development proposals to which this policy applies should be of a form, scale and size which is compatible with, and respects the character of, the local area and the surrounding countryside and its defining characteristics. Any environmental impact should be avoided or appropriately mitigated. | The Proposed Project involves development not of a type listed in Policy SP24, on a non-allocated site in the countryside. It is therefore not supported by Policy SP24. However, the Proposed Project is nationally significant and to be treated as a development for which development consent is required (see Section 1 of this Planning Statement). As set out in NPS EN-1, in the event of a conflict between the NPS and a local development plan, the NPS prevails for the purpose of the SoS decision-making given the national significance of the infrastructure (paragraph 4.1.15).<br>. |
| Policy SP26 – Landscape Character Areas | The Council will identify and support opportunities to conserve and enhance | **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | Thanet's landscape character and local distinctiveness. Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:<br>1) Its island quality surrounded by the silted marshes of the former Wantsum Channel<br>and the sea;<br>2) A sense of openness and 'big skies', particularly in the central part of the District;<br>3) Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes;<br>4) Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges;<br>5) Long-distance, open views, particularly across the Dover Strait and English Channel,<br>North Sea and across adjacent lowland landscapes; and<br>6) Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District.<br>Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape | the likely significant landscape and visual effects that could result from the Kent Onshore Scheme.<br>Embedded mitigation measures have been applied to reduce, and where possible avoid, landscape and visual effects of the Proposed Project. Measures that have been incorporated include:<br>• Sensitive routing and siting of infrastructure and temporary works;<br>• The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in response to the Design Principles presented in **Application Document 7.12.2 Design Principles – Kent**; and<br>• an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and biodiversity mitigation as well as biodiversity net gain.<br>The landscape and visual assessment indicates that the construction phase would result in significant adverse landscape and visual effects, especially due to large construction compounds, drilling rigs at landfalls, presence of near shore vessels off the coast, security fencing and hoarding. These effects are however temporary. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that limited and localized significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | Character Assessment (LCA) and summarised below.<br><br>All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views.<br>Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet. The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.<br><br>Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline. | effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in paragraphs 5.10.5 and 5.10.13 of NPS EN-1.<br><br>The Minster Converter Station and Substation would be constructed in a large-scale agricultural field enclosure near to the edge of Local Character Area E1: Stour Marshes. Policy SP26 specifically mentions LCA E1 as one that should be generally kept free of development, as it is "*largely undeveloped and key to retaining the island character of Thanet*". The routeing and siting of the Kent Onshore Scheme has been informed by landscape and visual considerations to minimise effects on LCA E1 (as explained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**). This in line with paragraph 5.10.12 of NPS EN-1 which directs applicants to pay particular attention to local policies based on landscape character assessment. However, the paragraph also confirms that "*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*". Paragraph 4.1.15 of NPS EN-1 also clarifies that, *"in the event of a conflict between* [a local development plan] *and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure".* |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as Green Wedges. The distinction between town and countryside should be retained. Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area. In such cases, landscape impacts should be minimised and mitigated as far as possible. | . |
| Policy SP27 - Green Infrastructure | All development proposals should, where possible, safeguard Thanet's Green Infrastructure network and enhance it by integrating new multifunctional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between and providing new Green<br>Infrastructure assets should be identified early in the design process for major developments, together with consideration of how they will be managed and maintained in the long term. | **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent** (oLEMP) describes landscape and ecological measures to avoid, reduce or compensate for environmental effects identified in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**, **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.10 Arboricultural Impact Assessment**.<br><br>The result of the landscape and ecological proposals set out in the oLEMP is that there will be a permanent net increase in woodland, wetland and semi-natural grassland creation around the Minster Converter Station and Substation and through the creation of swales along the permanent access road. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | Development should make a positive contribution to Thanet's Green Infrastructure network wherever possible and appropriate, by the incorporation, provision or fulfilment of those matters and objectives set out in paragraph 4.39 above. | National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole. Further details can be found in **Application Document 6.12 Environmental Net Gain Report.** |
| Policy SP28 - Protection of the International and European Designated Sites | Sites of International Nature Conservation Importance will receive the highest level of protection.<br><br>Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in-combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2017 (as may be amended). Where possible applicants should incorporate measures to avoid or mitigate any adverse impacts. Where, despite all possible avoidance and mitigation measures being put in<br>place, a proposal is still shown to have an adverse effect on the integrity of an International site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated. | **Application Document 6.6 Habitats Regulations Assessment Report** is provided with the DCO Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during construction, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme). Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, it is concluded that the Proposed Project, both alone and in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | Where proposals are considered likely to have a significant effect on an International site, early consultation with Natural England, the Council and any other appropriate statutory consultees is recommended. | The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br><br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this |

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| | | land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)** for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| Policy SP30 – Biodiversity and Geodiversity Assets | Development proposals will, where appropriate, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets resulting in a net gain for biodiversity assets through the following measures:<br>1) the restoration / enhancement of existing habitats,<br>2) the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development<br>3) the creation of linkages between sites to create local and regional ecological networks,<br>4) the enhancement of significant features of nature conservation value on development sites, | **Application Document 6.2.3.3 Part 3 Kent Chapter 2 Ecology and Biodiversity** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Kent Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of this part of the Proposed Project. Residual significant positive effects are anticipated during the construction phase for Ash Level and South Richborough Pasture Local Wildlife Site, habitats, ornithology, riparian mammals, terrestrial invertebrates, aquatic macrophytes and during the operation phase for habitats, ornithology dormouse, badgers, bats, reptiles, riparian mammals and terrestrial invertebrates due to habitat creation within the Minster Converter Station and Substation site.<br>The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected |

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| | 5) protect and enhance valued soils,<br>6) mitigating against the loss of farmland bird habitats.<br><br>Sites should be assessed for the potential presence of biodiversity assets and protected species. For sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be affected, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority. | species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br><br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)** for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document** |

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| | | **7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br>Mitigation measures to minimise the impact to BMV land and impacts to soil health are set out in **Application Document 7.5.3.2 CEMP Appendix B REAC** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| Policy SP32 – Protection of Open Space and Allotments | Proposals which would result in the loss of protected open space or allotments as shown on the policies map either through built development or a change of use will only be permitted if:<br>1) in relation to open space it is for an open recreation or tourism use and is of appropriate scale and design for its setting. Any related built development should be kept to the minimum necessary to support the open use, and be sensitively located; or<br>2) in relation to both open space and allotments there is an overriding a need for development that outweighs the need to protect the open space or allotment which cannot be located elsewhere. In this case provision of alternative open space or | Section 7.14 of the Planning Statement provides an overview of open spaces that are located within or adjacent to the Order Limits of the Proposed Project. There are no allotments affected by the Proposed Project. There are four areas of open space within the Kent Onshore Scheme Order Limits. This assessment concludes that there will be no material impact or loss to the function or use of the spaces identified in Kent. Whilst there might be some short-term disturbance to PRoWs during construction, this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** explain the details of the temporary short-term diversions and |

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| | allotment of at least an equivalent size and quality must be provided in a suitable nearby location; or<br>3) an assessment has been undertaken which clearly shows that the open space or allotments are no longer required; and<br>4) in all cases, there would be no material harm to the contribution the protected open space makes to the visual or recreational amenity of the area.<br><br>New development that is permitted by virtue of this policy should make a positive contribution to the area in terms of siting, design, scale, use of materials and biodiversity. | appropriate measures for the management of PRoW during the various stages of the Proposed Project.<br>Overall, there will be no permanent impact or loss of open space as a result of the Kent Onshore Scheme and therefore, Policy SP32 is not engaged.<br><br>Local Green Space identified on the Policies Map will not be impacted by the Proposed Project and therefore Policy SP33 is not engaged. |
| Policy SP33 – Local Green Space | The sites identified on the Policies Map as Local Green Space, and identified in paragraph 4.70, will be protected from development in accordance with the requirements of the National Planning Policy Framework. | |
| Policy SP35 – Quality Development | New development will be required to be of a high quality and inclusive design as set out in Policies QD01 and QD02. Developers may be required to seek an independent DesignReview for all major development proposals, and any proposals regardless of size in prominent locations or which are likely to have a significant visual impact. | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset.<br><br>Design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles |

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| | | covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things.<br><br>The site-specific design principles for the converter station sites in Kent provide guiding principles for the detailed design for these elements of the Proposed Project. As specified in Requirement 3 of Schedule 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for confirmation that they are in general accordance with the site-specific design principles.<br><br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide |

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| | | oversight of the ongoing design process and delivery of the Proposed Project. The key responsibilities of the design champion are set out in **Application Document 7.11.1 Design Principles – Suffolk** and **Application Document 7.11.2 Design Principles – Kent.**<br><br>An explanation of how the design of the converter station site responds to its wider context is presented in **Application Document 7.11.2 Design Approach Document – Kent.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel. |
| Policy SP36 _ Conservation and Enhancement of Thanet's Historic Environment. | The Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by:<br>1) protecting the historic environment from inappropriate development;<br>2) encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building or its historical or archaeological significance;<br>3) requiring the provision of information describing the significance of any heritage | **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets |

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| | asset affected and the impact of the proposed development on this significance;<br>4) facilitating the review of Conservation Areas and the opportunities for new designations;<br>5) recognising other local assets through Local Lists;<br>6) offering help, advice and information about the historic environment by providing guidance to stakeholders, producing new guidance leaflets, reviewing existing guidance leaflets and promoting events which make the historic environment accessible to all;<br>7) issuing Article 4 Directions which will be introduced and reviewed as appropriate;<br>8) supporting development that is of high quality design and supports sustainable development.<br>All reviews and designations will be carried out in consultation with the public in order to bring a shared understanding of the reasons for the designation and the importance of the heritage asset. | Mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent Onshore oWSI (Draft)** and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets. The Heritage Statement concludes that the Onshore Scheme would result in less than substantial harm to eight non-designated heritage assets of negligible value.<br>The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated assets. The Kent Onshore Scheme would result in less than substantial harm to one non-designated heritage asset of schedulable quality.<br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of this Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| Policy SP37 – Climate Change | New development must take account of the need to respond to climate change: | **Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** presents an |

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| | 1) by minimising vulnerability and providing resilience to the impacts of climate change through the use of up to date technologies, efficient design and appropriate siting and positioning of buildings;<br>2) mitigating against climate change by reducing emissions and energy demands through the use of up to date technologies;<br>3) realise and make best use of available opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast. | assessment of the likely significant effects of the Proposed Project on the climate and climate change effects that affect the Proposed Project and surrounding environment. Embedded mitigation measures have been integral in reducing, where possible avoiding, the climate change effects of the Proposed Project. These measures include sensitive routeing and siting of infrastructure and temporary works, use of low carbon construction techniques, use of materials with a low embodied carbon and commitments made within the **Register of Environmental Actions and Commitments (REAC) (Application Document 7.5.3.2 CEMP Appendix B)**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>A **Greenhouse Gas Management Plan** (**Application Document 7.5.13)** has been prepared and sets out how Greenhouse Gas (GHG) emissions are to be managed across the lifecycle of the Proposed Project and are secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft DCO.** This plan includes the identification of opportunities for reducing GHG emissions, GHG reduction targets and allocation of responsibilities for associated actions.<br><br>The Lifecycle GHG Assessment has considered all GHG emissions from within the Order Limits arising during all stages of the construction, operation and decommissioning, as well as emissions from off-site activities. The Proposed Project will result in increased |

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| | | GHG emissions during construction and operation, which are estimated to contribute less than 0.01% of any respective UK carbon budget. The effect of the Proposed Project on the global climate is deemed to be minor adverse and not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Proposed Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels.<br><br>The Climate Change Resilience Assessment considers the impacts of climate change on the Proposed Project over its lifetime by identifying likely changes to the climate and potential climate hazards (including, increase winter precipitation, increase frequency and severity of extreme weather events, sea level rise and drought). This assessment has found that there are no significant climate change risks to the Proposed Project, assuming the embedded mitigation measures are successfully implemented into the design. The effect of climate change risk on the Proposed Project is therefore deemed to be not significant.<br><br>The assessment set out in **Application Document 6.2.4.2 Part 4 Offshore Scheme Chapter 1 Physical Processes** reports a moderate (significant) effect during the operational lifetime of the Proposed Project from coastal geomorphological changes due to the |

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| | | effects of climate change. The future baseline described in Section 1.7 of **Application Document 6.2.4.2 Part 4 Offshore Scheme Chapter 1 Physical Processes** accounts for how the effects of climate change and the associated effects of sea level rise and increased storminess may alter the landfall sites. Further information is provided on how the effects of climate change are considered within the Proposed Project, see **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change.** |
| Policy SP38 - Healthy and Inclusive Communities | The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities.<br>Proposals will be supported that:<br>1) bring forward accessible community services and facilities, including new health facilities;<br>2) safeguard existing community services and facilities;<br>3) safeguard or provide open space, sport and recreation;<br>4) promote healthier options for transport including cycling and walking;<br>5) improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops; | Section 11.9 of **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing** evaluates the implications of the Kent Onshore Scheme on various health determinants, emphasising the importance of integrating health considerations into the assessment. This includes assessing the scheme's impacts on factors such as access to healthcare, air quality, noise and vibration, transport and access, open space, and social cohesion and community identity, ensuring that proposed developments align with the goal of fostering healthy and inclusive communities. The assessment concludes that, with appropriate mitigation measures, there will be no significant adverse effects on human health and wellbeing<br>.<br> |

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| | 6) create social interaction and safe environments through mixed uses and the design and layout of development;<br>7) create greener neighbourhoods and improve biodiversity and access to nature. | |
| Policy SP43 - Safe and Sustainable Travel | The Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and<br>walking opportunities to reduce the need to travel by car. | Access during construction, operation and decommissioning of the Proposed Project will not result in significant adverse effects on pedestrians, equestrians or cyclists.<br>A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project. The Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15). However, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. The likely impact of the Proposed Project on PRoW Diversions is considered to be not significant |
| Policy SP44 - Accessible locations | Development generating a significant number of trips will be expected to be located where a range of services are or will be conveniently accessible on foot, by cycle or public | The assessment presented in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** conclude that with mitigation measures, no significant adverse effects on sensitive receptors including |

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| | transport. The Council will seek to approve proposals to cluster or co-locate services at centres accessible to local communities by public transport and on foot. | PRoW, and on the use and safety of the road network, are anticipated during construction.<br><br>Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent**, secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent.**<br><br>During the operational and maintenance phase, the Kent Onshore Scheme will be manned by two operatives across the site resulting in up to four daily car/LGV trips. There will also be additional infrequent trips associated with monthly or annual maintenance/inspections or repairs when required. Therefore, the Kent Onshore Scheme will generate a low level of trips during the operation phase. |
| Policy SP45 – Transport Infrastructure | Development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to make a proportionate contribution to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements.<br><br>Subject to individual assessments, schemes may be required to provide or contribute to:<br><br>1) capacity improvements/connections to the cycle network;<br><br>2) provision of pedestrian links with public transport routes/interchanges;<br><br>3) improvements to passenger waiting facilities;<br><br>4) facilities for display of approach time information at bus stops along identified quality bus corridors;<br><br>5) improvement and expansion of public transport services; | |

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| | 6) improvements to the road network in line with schemes identified through the transport strategy;<br>7) provision of electric vehicle charging points, in accordance with policy SP14. | |
| Policy E10 – Thanet's Beaches | Major Holiday Beaches<br>On those beaches identified as major holiday beaches below, the Council will support proposals for the provision and upgrading of a wide range of recreational facilities and services including tourist accommodation:<br>1) Main Sands, Margate<br>2) Ramsgate Main Sands<br>3) Viking Bay, Broadstairs<br><br>Proposals must also comply with the heritage policies of this plan and the National Planning Policy Framework.<br><br>At Margate Main Sands recreational facilities will be concentrated on that part of the beach at the junction of Marine Terrace and Marine Drive and the built form shall not project above the level of the seafront promenade.<br><br>Development proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations. | The Kent Landfall is located at Pegwell Bay, which is identified on the Policies Map as an "undeveloped beach". Policy E10 seeks to ensure that the natural, remote and undeveloped character of undeveloped beaches are maintained and enhanced.<br><br>The Kent Landfall is the transition point from underground HVDC cable to marine HVDC cable and will be achieved using a trenchless crossing technique beneath the saltmarsh habitat within the Pegwell Bay. Due to its buried nature, once completed, the Kent Landfall will not detract from the undeveloped character of the beach.<br><br>Impact on designated nature conservation has been considered and is set out in **Application Document 6.6 Habitats Regulation Assessment Report.** The buried HVDC cable would traverse Thanet Coast and Sandwich Bay SPA/Ramsar for a distance of approximately 3 km. This includes traversing the saltmarsh and upper mudflat, and the intertidal mudflat that constitutes most of Pegwell Bay at low tide. The use of a trenchless crossing will not contain any provision for surface trenching through the saltmarsh of Thanet Coast & Sandwich Bay SPA/Ramsar or Sandwich Bay SAC and therefore, no Adverse Effect on Integrity (AEoI) for the qualifying features of the |

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| | Intermediate Beaches<br>On those beaches identified as intermediate beaches below, and where scope exists for such development, the Council will support proposals for small scale tourism and leisure development (e.g. tourist accommodation, kiosks supplying food and refreshments, beach huts and beach furniture), subject to the scale of provision being consistent with the intermediate status of the beach and satisfactory design and siting of development:<br>1) Dumpton Gap (part)<br>2) Joss Bay<br>3) Louisa Bay<br>4) Minnis Bay (part)<br>5) St Mildred's Bay<br>6) Stone Bay<br>7) Walpole Bay<br>8) Westbrook Bay<br>9) Western Undercliff, Ramsgate<br>10) West Bay<br>Development proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations.<br><br>Undeveloped Beaches | Thanet Coast and Sandwich Bay SPA/Ramsar would arise through habitat loss. |

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| | On, or adjacent to undeveloped beaches identified on the Policies Map, priority will be given to the maintenance and enhancement of their natural, remote and undeveloped character. New development including new built facilities, the provision of public car parking facilities and new or improved vehicular access to serve such beaches will not be permitted. In the event that there is an overriding need for development/necessary infrastructure that cannot be met or located elsewhere, such proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations. | |
| Policy E16 – Best and Most Versatile Agricultural Land | Except on sites allocated for development by virtue of other policies in this Plan, planning permission will not be granted for significant development which would result in the irreversible loss of best and most versatile agricultural land unless it can be clearly demonstrated that:<br>1) the benefits of the proposed development outweigh the harm resulting from the loss of agricultural land,<br>2) there are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and<br>3) the development will not result in the remainder of the agricultural holding becoming not viable or lead to likely | As set out in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils**, a total permanent land take of 12.27 ha is required for the Kent Onshore Scheme, of which 12.21 ha is graded as BMV land.<br>The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Proposed Project. The benefits provided by the Proposed Project, as explained in Section 5 of the Planning Statement, outweigh the resultant loss of BMV agricultural land.<br>The routeing and siting selection process (see Section 7.9 of the Planning Statement, set out in detail in **Application Document 8.1 Historic Report (CPRSS)** and **Application Document 8.1 Historic Report** |

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| | accumulated and significant losses of high-quality agricultural land. | **(Options Selection and Design Evolution Report),** and summarised in **Application Document 7.3 Design Development Report**) confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Proposed Project.<br>The impact on the viability of agricultural holdings was scoped out of the ES and will be dealt with through compensation agreements which lie outside of the ES process (as explained in **Application Document 6.15 Scoping Opinion 2022**). |
| Policy GI01 – Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ) | Development which would materially harm either directly, indirectly or cumulatively, or detract from the scientific or nature conservation interest of a Site of Special Scientific Interest, National Nature Reserve or Marine Conservation Zone will not be permitted.<br><br>Exceptionally, where it can be demonstrated that the need for the proposed development is compelling and overrides the national importance of the site, and it has been demonstrated that no suitable alternative site exists, mitigating measures will be required to maintain the integrity of the site, to the satisfaction of the appropriate authority. | The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>**Application Document 6.11 Marine Conservation Zones Assessment** is submitted with the DCO Application. The MCZ assessment identifies the potential impacts that could arise from the planned |

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| | The proposed development will, wherever possible and appropriate, include measures to enhance and improve connectivity to designated sites. | activities for the Proposed Project and the MCZ sites that could be affected.<br><br>The first stage of the assessment (screening) concluded that there was a likely significant risk of the Offshore Scheme affecting the designated features and/or conservation objectives of one or more MCZ (Goodwin Sands MCZ, Kentish Knock East MCZ, Thanet Coast MCZ and Medway Estuary MCZ). Identified pathways for LSE included temporary physical disturbance to benthic habitats and species (Goodwin Sands MCZ only), temporary increase in Suspended Sediment Concentration (SCC), direct loss of benthic habitats and species (Goodwin Sands MCZ only) and underwater noise (Goodwin Sands MCZ and Medway Estuary MCZ only).<br><br>The stage 1 assessment found that the identified impact pathways are not considered to have significant effects on the designated features or conservation objectives of the MCZs. As a result, it was therefore concluded that the conditions of Section 126 of the Marine and Coastal Act 2009 can be met and that there is not a likely significant risk to any of the identified designated features or conservation objectives of the sites as a result of the Proposed Project. A derogation under section 126(7) of the Marine and Coastal Access Act 2009 is not required. |
| Policy GI02 - Locally Designated Wildlife Sites | Development which would have a detrimental impact on locally designated wildlife sites will not be permitted unless suitable mitigation | The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally, regionally and locally designated |

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| | can be provided either on or off site within Thanet. Exceptionally, where a strategic need for a proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere, an equivalent area of habitat will be created elsewhere at a suitable location well related to other existing habitats.<br><br>Wherever possible and appropriate, new developments will provide a net environmental<br>gain in accordance with Policy SP30, and include measures to enhance and improve wildlife connectivity to designated wildlife sites. | biodiversity and geological sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft DCO.**<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent**), as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br><br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)** for the Kent Onshore Scheme and also in the **Application Document** |
| Policy GI03 - Regionally Important Geological Sites (RIGS) | At RIGS sites, development which would result in the loss or obstruction of geological features of importance will only be permitted where a strategic need for the proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere. | |

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| | | **7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| Policy GI06 – Landscaping and Green Infrastructure | Major development proposals and all other proposals which are likely to have significant landscape implications shall be supported by a landscape survey. The landscape survey should describe the current landscape features on the application site, and demonstrate how the proposed development will provide landscaping and Green Infrastructure to enhance the setting of the development, where possible and appropriate, to:<br>● Retain historic features including boundaries and layouts<br>● Create new wildlife corridors and stepping stones<br>● Soften hard building lines and the impact of new buildings<br>● Create an attractive environment for users and occupiers<br>● Establish a sense of enclosure with hedges and trees<br>● Provide screening from noise and sun<br>● Create new wildlife habitats and improve biodiversity including the integration with surface water management | **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme. Landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible.<br>National Grid has taken opportunities to provide landscape and ecological mitigation and enhancement measures. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**) includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour. |

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| | ● Improve connectivity between new and existing features<br><br>The developer will need to satisfy the Council that adequate arrangements to ensure continued maintenance of landscaping has been made. The Council may seek to secure arrangements for this purpose through a planning agreement. | |
| Policy QD01 – Sustainable Design | All new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and have resilience to function in a changing climate. All developments will be required to:<br>1) Achieve a high standard of energy efficiency to the equivalent of Level 4 of the Code for Sustainable Homes (subject to HE05 where applicable). Where viability is an issue, it will be incumbent on an applicant to demonstrate to the satisfaction of the Council why this standard cannot be achieved.<br>2) Make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping.<br>3) Provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.<br><br>All new buildings and conversions of existing buildings must be designed to use resources | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset.<br><br>The Proposed Project's design has incorporated measures to reduce GHG emissions and provide resilience to climate change, where possible. Other control and management measures are also proposed. These measures and control measures are outlined in Section 4.8 of **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change** and are summarised below:<br>● The flood mitigation measures detailed in **Application Document 6.2.2.4 Environmental Statement Part 2 Suffolk Chapter 4 Water Environment** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment**.<br>● Commitments made within Application Document 7.5.3.2 CEMP Appendix B REAC. |

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| | sustainably. This includes, but is not limited to:<br>4) Re-using existing buildings and vacant floors wherever possible;<br>5) Designing buildings flexibly from the outset to allow a wide variety of possible uses;<br>6) Using sustainable materials wherever possible and making the most sustainable use of other materials;<br>7) Minimising waste and promoting recycling, during both construction and occupation. | • The use of materials with a low embodied carbon and employing low-carbon construction techniques.<br>• Sensitive routeing and siting of permanent infrastructure and temporary works.<br>• Designing the Proposed Project to be resilient to any significant effects of climate change.<br>The assessment presented in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** concludes that with mitigation measures, the assessment of traffic generated during construction, operation and decommissioning of the Proposed Project will not result in significant adverse effects on road users, pedestrians, equestrians or cyclists and road links in terms of severance, delay, amenity, fear and intimidation, hazardous/large loads or accidents and safety.<br>Site waste shall be managed in a structured and auditable manner in accordance with the agreed SWMP, from the commencement of the Proposed Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. Further details on Construction Waste are found in **Application** |

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| | | **Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.** |
| Policy QD02 - General Design Principles | The primary planning aim in all new development is to promote or reinforce the local character of the area and provide high quality and inclusive design and be sustainable in all other respects. Development must:<br>1) Relate to the surrounding development, form and layout and strengthen links to the adjacent areas.<br>2) Be well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, density, layout and use of materials appropriate to the locality. The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users.<br>3) Incorporate a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access.<br>4) Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime. External spaces, landscape, public realm, and boundary treatments must be designed as an integral | Design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things.<br><br>The site-specific design principles for the converter station sites in Kent provide guiding principles for the detailed design for these elements of the Proposed Project. As specified in Requirement 3 of Schedule 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for confirmation that they are in general accordance with the site-specific design principles.<br><br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application** |

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| | part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:<br>5) Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are should be retained, enhanced and protected where<br>appropriate.<br>6) An integrated approach is taken to surface water management as part of the overall design.<br>7) A coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.<br>8) Trees and other planting is incorporated appropriate to both the scale of buildings and the space available, to provide opportunities for increasing biodiversity interest and improving connectivity between nature conservation sites where appropriate.<br><br>Residential development on garden land will be permitted where not judged harmful to the local area in terms of the character and residential amenity, the intrinsic value of the site as an open space is not considered worthy of retention, and will not conflict with | **Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide oversight of the ongoing design process and delivery of the Proposed Project. The key responsibilities of the design champion are set out in **Application Document 7.11.1 Design Principles – Suffolk** and **Application Document 7.11.2 Design Principles – Kent.**<br><br>An explanation of how the design of the converter station site responds to its wider context is presented in **Application Document 7.11.2 Design Approach Document – Kent.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel.<br><br>The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed alongside consultation and stakeholder feedback including engagement with a Design Review Panel as explained in **Application Document 7.11.2 Design Approach Document – Kent**. Design Principles have been |

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| | any other requirements of other design policies and Policy HO1. | provided with the application for development consent. The Design Principles provide guidance regarding the design intent that would be adopted and embedded into the detailed design of the structure. Refer to **Application Document 7.12.2 Design Principles – Kent Tables 3.1 and 4.1**.<br><br>A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project. The Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public, resulting in no significant impacts during construction or decommissioning.<br><br>The indicative landscaping strategy is provided in **Application Document 7.5.7.2 Figure 1 Minster Converter Station and Substation Outline Landscape Mitigation**. |
| Policy HE01 – Archaeology | The Council will promote the identification, recording, protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to | **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. |

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| | encourage and develop their educational, recreational and tourist potential through management and interpretation.<br><br>Developers should submit information with the planning application that allows an assessment of the impact of the proposal on the significance of the heritage asset.<br>Where appropriate the Council may require the developer to provide additional information in the form of a desk-based or field assessment. Planning permission will be refused without adequate assessment of the archaeological implications of the proposal. Development proposals adversely affecting the integrity or setting of Scheduled Monuments or other heritage assets of comparable significance will normally be refused.<br><br>Where the case for development which would affect an archaeological site is accepted by the Council, preservation in situ of archaeological remains will normally be sought.<br><br>Where this is not possible or not justified, appropriate provision for investigation and recording will be required. The fieldwork should define: | National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets<br><br>**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets.<br><br>The Heritage Statement (Appendix D of this Planning Statement) concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Suffolk Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to three designated heritage assets and five non-designated heritage assets and that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality and one designated heritage asset. With regards to Policy HE02, the Kent Onshore Scheme would not impact on any Conservation Areas. |

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| | 1) the character, significance, extent and condition of any archaeological deposits or structures within the application site;<br>2) the likely impact of the proposed development on these features;<br>3) the means of mitigating the effect of the proposed development.<br><br>Recording should be carried out by an appropriately qualified archaeologist or archaeological contractor and may take place in advance of and during development. No work shall take place until a specification for the archaeological work has been<br>submitted and approved by the Council. Arrangements must also be in place for any<br>necessary post- excavation assessment, analysis and publication of the results, and deposition of the archive in a suitable, accessible depository. | In accordance with the Policy HE03, the substantial public benefits and need for the Proposed Project, as set out in Section 5 of this Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality.<br><br>Measures to mitigate impacts on Archeaology are set out in **Application Document 7.5.3.1 Outline Onshore CEMP, Appendix A Outline CoCP.** In addition to the above, further mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent Onshore oWSI (Draft) and Application Document 7.5.4.1 Suffolk Onshore oWSI (Draft)** and include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. |
| Policy HE02 – Development in Conservation Areas | Within conservation areas, development proposals which preserve or enhance the character or appearance of the area, and accord with other relevant policies of this Planwill be permitted, provided that:<br>1) Respond sympathetically to the historic settlement pattern, plot sizes and plot widths, open spaces, streetscape, trees and landscape features; 2) Respond sympathetically to their setting, context and | |

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| | the wider townscape, including views into and out of conservation areas;<br>3) Relate well to the features and design of each other and to adjoining buildings;<br>4) Demonstrate that walls, gates and fences are, as far as possible, of a kind traditionally used in the locality;<br>5) Conserve or enhance the significance of all heritage assets, their setting and the wider townscape, including views into and out of conservation areas;<br>6) Demonstrate a clear understanding of the significance of heritage assets and of their wider context.<br><br>New development which would detract from the immediate or wider landscape setting of any part of a conservation area will not be permitted. | |
| Policy HE03 – Heritage Assets | The Council supports the retention of local heritage assets, including buildings, structures, features and gardens of local interest. Local heritage assets will be identified in a local list as part of the Heritage Strategy.<br><br>Proposals that affect both designated and non-designated heritage assets, will be assessed by reference to the scale of harm, both direct and indirect, or loss to, he | |

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| | significance of the heritage asset in accordance with the criteria in the National Planning Policy Framework. | |
| Policy HE04 - Historic Parks and Gardens | Proposals that affect historic parks and gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to and the significance of the park or garden. | As set out in A**pplication Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** there are no Registered Parks and Gardens within the Study Area for the Kent Onshore Scheme used to inform the ES Assessment, or within the wider Study Area used to assess the potential for impacts on setting. |
| Policy CC01 – Fluvial and Tidal Flooding | New development in an area identified as being at risk of flooding and falling within Flood Zones 2 and 3, will only be permitted if it can be demonstrated that it satisfies the Sequential Test and, where required, the Exception Test as set out in the NPPF.<br><br>Development proposals in these areas shall be accompanied by a Flood Risk Assessment, including developments over 1 hectare in Flood Zone 1, which should address flood risk from all sources of flooding including surface and groundwater flooding.<br><br>Any development that takes place in a flood risk area will be expected to incorporate flood resilient measures. | The Kent Onshore Scheme is situated in the hydrological catchment of the River Stour. The River Stour is a designated main river that rises as the Great Stour in Lenham and flows towards and through Canterbury, where it becomes tidal, finally discharging to the sea at Pegwell Bay. The river has extensive areas of floodplain, designated as Environment Agency Flood Zone 3, with some areas mapped as benefitting from flood defences.<br><br>The Flood Risk Assessment (**Application Document 6.8 Flood Risk Assessment**) and supporting assessments and hydraulic modelling confirm that the Proposed Project, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Proposed Project, taking into account climate change. The surface water drainage design demonstrates that SuDS have been designed into the Proposed Project. |
| Policy CC02 - Surface Water Management | New development is required to manage surface water resulting from the development using sustainable drainage systems (SuDs) | |

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| | wherever possible. SuDs design, together with a robust long term maintenance plan should be included as an integral part of the master planning and design process for new development and should, wherever possible, incorporate multi-functional benefits for people and wildlife. Developers should demonstrate how the guidance produced by the Lead Local Flood Authority (LLFA) has been taken into account and applied when submitting a planning application for any major development. Approval of the design and measures to be implemented for the long term maintenance of SuDs will be required prior to development being permitted.<br>When preparing SuDs schemes developers should fully consider the potential impact on the historic environment and ensure that any damage is mitigated. Proposals for SuDs at sites within the Groundwater Source Protection Zone as shown on the Policies Map, or sites near the Groundwater Source Protection Zone, must demonstrate that the methods used will not cause detriment to the quality of the groundwater.<br><br>Sites identified as a Tidally Sensitive Area (as identified in surface water management plans) will need to incorporate Sustainable Drainage Methods and a maintenance schedule where appropriate, at the design stage of a planning application, and a Flood | Measures for mitigation of surface water flooding, including SuDs, are covered in Section 4.8 and 4.10, with further information provided within **Application Document 6.8 Flood Risk Assessment** and a secured commitment for provision of a detailed Construction Surface Water Management Plan to be prepared by the appointed contractor.<br><br>A sequential approach has been applied in selecting the land for the Proposed Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. Evidence of passing the Sequential Test and Exception Test is presented in **Application Document 6.8 Flood Risk Assessment** and Section 7.6 of the Planning Statement.<br><br>The Proposed Project is not considered to be located in a Tidally Sensitive area. |

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| | Risk Assessment will be required before planning permission can be granted. | |
| Policy CC03 – Coastal Development | Proposals for new development within 40 metres of the coastline or clifftop must demonstrate to the satisfaction of the Council that it will not:<br>1) expose people and property to the risks of coastal erosion and flooding for the life of the development; or<br>2) accelerate coastal erosion due to increased surface water run off; and<br>3) impact on natural habitats through the process of coastal squeeze or otherwise restrict the capacity of the coastline to adjust to sea-level rise and climate change. | The impacts from coastal geomorphological change and associated changes to transport sediment are assessed in **Application Document 6.2.4.2 Part 4 Offshore Scheme Chapter 1 Physical Processes,** which concludes that this impact would result in a minor effect (not significant) at the Kent Landfall, during construction and operation, taking into account mitigation measures that have been incorporated into the project design to reduce physical processes effects. Throughout its operational lifetime, it is intended that the majority of the cable will be trenched into the seabed. Therefore, the presence of the cable will have no impact on bedload sediment transport processes and therefore, will not impact coastal geomorphology. |
| Policy SE01 - Potentially Polluting Development | Development with potential to pollute will be permitted only where:<br>1) Applicable statutory pollution controls and siting will effectively and adequately minimise the impact upon existing and proposed land uses and the<br>Environment including the effects, including cumulative effects, on health, the natural environment such as significant natural and heritage assets, or general amenity resulting from the release of pollutants to water, land | **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** provide assessments of the likely effects on air quality that could result from the construction, operation and decommissioning of the Kent Onshore Scheme. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.3.2.8.A Appendix 2.8.A Construction Dust Assessment and Methodology** and **Application Document 6.3.3.8.A Appendix 3.8.A Construction Dust Assessment and Methodology**. The assessments |

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| | or air or from noise, dust, vibration, light, odour or heat; and<br><br>In determining individual proposals, regard will be paid to:<br>2) The economic and wider social need for the development; and<br>3) The visual impact of measure needed to comply with any statutory environmental quality standards or objectives.<br>4) where there is an impact and the development is acceptable, a suitable mitigation is proposed to the satisfaction of the pollution control regimes.<br><br>Permission for development which is sensitive to pollution will be permitted only if it is sufficiently separated from any existing or potential source of pollution as to reduce pollution impact upon health, the natural environment or general amenity to an acceptable level, and adequate safeguarding and mitigation on residential amenity. | conclude that during construction, operation and decommissioning phases the effects on air quality, generated by the Onshore Scheme would be negligible and therefore not significant.<br><br>With regards to noise **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Kent Onshore Scheme respectively. The proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent due to compaction activities associated with the construction of access routes and underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with Best Practicable Means (BPM) being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life. |

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| | | The assessments conclude that significant residual adverse effects from noise generated by the Proposed Project upon noise sensitive receptors during construction can be avoided through the use of standard mitigation in the form of BPM .As set out in the Outline Noise and Vibration Management Plans (**Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk** and **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent)**, further detailed construction noise and vibration assessments would also be undertaken by the contractor prior to commencing works<br><br>**Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment** presents the assessment of the likely significant water environment effects that could result from the Kent Onshore Scheme. The assessment finds the impacts on water quality and flood risk are expected to be minor, with mitigation measures in place to ensure that any potential risks are managed effectively. This approach is consistent with policy SE01.<br><br>**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme. Landscape proposals have responded to the design of the Proposed Project |

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| | | throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible.<br>The majority of significant cumulative effects identified are anticipated to occur during the construction and decommissioning phases of the Proposed Project and therefore, will be temporary in nature.<br>There is the potential for a significant total cumulative effect on LCA E1 Stour Marshes given the concentration of energy related development close to and within Richborough Energy Park. It should be noted the industrial setting presents a less sensitive part of LCA E1,which does not exhibit characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1.<br>The only permanent significant cumulative effect identified for Kent Onshore Schemes for which no additional mitigation can be provided is the loss of BMV land for which there is no additional mitigation apart from that set out in **Application Document 7.5.10.2 Outline Soil Management Plan - Kent,** and **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice.** All management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |

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| | | **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **Application Document 7.1 Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target. 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. Sea Link would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately net zero.<br><br>The wider socio-economic benefits of the Proposed Project are set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**. |
| Policy SE03 - Land affected by Contamination | Development proposals that would enable contaminated sites to be brought into beneficial use will normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety and the environment, including underlying groundwater resources.<br><br>Development on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where: | Baseline assessments and preliminary contamination risk assessments (PRA) have been undertaken and presented in **Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment** and **Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment** to assess the exposure of existing ground contamination through ground disturbance for the Kent Onshore Scheme during construction and decommissioning. The results of the assessments identified a generally low risk of significant existing ground contamination within the study areas. Where limited and localised sites with moderate or above risk have been identified, further assessment has identified |

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| | 1) an appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use;<br>2) the proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site.<br><br>Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented, before occupation.<br><br>In the case of sites where contamination is only considered to be a possible risk, a site investigation will be required by condition. Sites where contamination is believed to have been removed or where the full site history is unknown should not be able to be considered as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the untended use of the land. | a very low/low risk to sensitive receptors. With good practice measures, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice** and secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, the impacts from existing ground contamination on construction workers is considered negligible.<br><br>Further contamination assessments were undertaken to ensure the Order Limits are suitable and safe for the Proposed Project. Ground gas monitoring and assessments undertaken by National Grid, identified a low risk of potential ground source gas exposure/disturbance in the Order Limits for the Kent Onshore Scheme. |
| Policy SE04 – Groundwater Protection | Proposals for development within the Groundwater Source Protection Zones identified on the Policies Map will only be | Groundwater risk assessments have been undertaken for the Kent Onshore Scheme and are set out in **Application Document 6.3.3.5.B Appendix3.5.B** |

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| | permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented. Proposals which involve the use of piled foundations on contaminated sites must demonstrate that they will not cause disturbance of any ground so as to cause turbidity in water supply and/or create pathways enabling contaminated materials to reach the groundwater.<br><br>Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer. | **Qualitative Groundwater Risk Assessment**. The assessments conclude that there is a low/moderate risk of existing contamination within groundwater, that could be mobilised. However, with control and management measures set out in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** , as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, the potential effects of groundwater contamination are expected to be minor due to mitigation measures. |
| Policy SE05 – Air Quality | All major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality.<br><br>Development will be located where it is accessible to support the use of public transport, walking and cycling.<br><br>New development must ensure that users are not significantly adversely affected by the air quality and include mitigation measures where appropriate. | The Proposed Project has been subject to a comprehensive site selection and routeing process including consideration of accessibility. A detailed summary of this process is available in **Application Document 7.3 Design Development Report.**<br><br>**Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assess the likely air quality effects that would result from the Onshore Schemes and consider the existing baseline conditions and the likely changes and effects to air quality levels during the construction, operation and maintenance and decommissioning phases. The assessments confirm |

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| | All developments which either individually or cumulatively are likely to have a detrimental impact on air quality, will be required to submit an Air Quality and/or Emissions Mitigation Assessment, in line with the Air Quality Technical Planning Guidance 2016 and any subsequent revisions.<br><br>The Air Quality Assessment should address the cumulative effect of further emissions.<br><br>The Emission Mitigation Assessment should address any proposed mitigation measures through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration. These will be of particular importance within the urban AQMA, associated areas and areas of lower air quality. Proposals that fail to demonstrate these will not be permitted. | there would not be a deterioration in air quality or substantial changes in air quality levels and therefore not expected to have significant adverse effects upon air quality. The Kent Onshore Scheme would also not lead to a breach of any national air quality limits or statutory air quality objectives.<br><br>The Kent Onshore Scheme has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, and this includes the provision of a construction dust management plan. Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>Air quality management plans have been compiled and presented in **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent**. Both management plans set out measures to control and |

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| | | management air quality impacts during construction. As set out in the air quality management plans, construction vehicles will conform to relevant applicable standards and will be correctly maintained and operated in accordance with the manufacturer's recommendations, so as to help reduce vehicle emissions. Both management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** |
| Policy SE06 – Noise Pollution | In areas where noise levels are relatively high, permission will be granted for noise-sensitive development only where adequate mitigation is provided, and the impact of the noise can be reduced to acceptable levels.<br><br>Development proposals that generate significant levels of noise must be accompanied by a scheme to mitigate such effects, bearing in mind the nature of surrounding uses.<br><br>Proposals that would have an unacceptable impact on noise-sensitive areas or uses will not be permitted. | With regards to noise **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** present the assessments of the likely significant noise and vibration effects that could result from the Kent Onshore Scheme respectively.<br><br>The Proposed Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures (as secured by **Application Document 7.5.3.2 CEMP Appendix B REAC**, as part of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**), potential significant adverse effects of the Kent Onshore Scheme at NSR during construction, operation and decommissioning can be avoided. It is noted that potential vibration levels during construction are predicted to exceed the SOAEL at a small number of NSR within Kent due to compaction activities associated with the construction of access routes and |

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| | | underground cable construction. However, as these activities would be for a very short duration (likely to be a single day) and with BPM being employed to reduce vibration levels as far as practicable, these effects are considered to be acceptable as they would not have significant or permanent impacts on health or quality of life. |
| Policy SE08 - Light Pollution | Development proposals that include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted if it can be demonstrated that:<br><br>1) It has been designed to minimise light glare, light trespass, light spillage and sky glow through using the best available technology to minimise light pollution and conserve energy;<br><br>2) There is no adverse impact on residential amenity and the character of the surroundings;<br><br>3) There is no adverse impact on sites of nature conservation interest and/or protected and other vulnerable species and heritage assets;<br><br>4) There is no adverse impact on landscapes character areas, the wider countryside or those areas where dark skies are an important part of the nocturnal landscape; | The visual assessment presented in **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment** and summarised in this chapter, has assessed the likely significant effects on visual amenity from the construction, operation and maintenance of the Proposed Project. At Viewpoints 1 and 6 associated construction lighting is expected to be localised which would be visible across parts of horizontal extent of the view largely associated with the construction compounds in the context of the A256. At Viewpoints 4, 8 and10 associated construction lighting would be visible across a large part of the horizontal extent of the view, largely associated with the construction compounds.<br><br>At other visual receptors, associated lighting is likely to be largely screened by intervening vegetation or would be within the context of the urbanised hinterland.<br><br>It is considered that with appropriate mitigation measures outlined in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC**, the impacts of the Kent Onshore Scheme from light |

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| | 5) It does not have an adverse impact on long distance views or from vantage points;<br><br>6) Where appropriate, mitigation measures are proposed.<br><br>In addition a lighting strategy may be required for major developments or those developments with specific lighting requirements or for those that are in or adjacent to sensitive locations.<br><br>A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category, as set out in Table 15 Environmental Zones.<br><br>Proposals that exceed the Institution of Lighting Professionals standards will not be permitted. | pollution will not unacceptably harm living conditions and residential amenity.<br><br>As stated in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** assumptions regarding operational and maintenance lighting requirements for Minster Converter Station and Substation:<br><br>• associated lighting is expected to be limited to external column and building mounted lighting. It would be controlled manually as required during periods of low light or darkness and has been designed to minimise light spill.<br><br>• there would also be security lighting on sensors within the access gate area / entrance gates which would automatically turn on lighting at the gate when approached in sufficient darkness.<br><br>• should maintenance activities be required to be undertaken in poor light conditions, additional temporary task lighting would be brought to site.<br><br>The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by |

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| | | a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** report the assessment of the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br><br>**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme. Landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible. |

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| Policy TP01 - Transport Assessments and Travel Plans | Development proposals would have significant transport implications shall be supported by a Transport Assessment and where applicable a Travel Plan. These should show how multi-modal access travel options will be achieved, and how transport infrastructure needs arising from the expected demand will be provided.<br><br>In relation to other developments, a Transport Statement will be required, which addresses any transport impacts arising from the development and any mitigation measures that are needed to minimise the identified impact. | The assessment presented in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** conclude that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. The Proposed Project is expected to generate a very low level of vehicle movements during the operational and maintenance phase<br><br>Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent**, secured by Requirement 6 of Schedule 3 **Application Document 3.1 draft DCO**. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent.**<br><br>A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of |
| Policy TP02 - Walking | New development will be expected to be designed so as to facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and people with young children.<br><br>The Council will seek to approve proposals to provide and enhance safe and convenient walking routes including specifically connection to and between public transport stops railway stations, town centres, residential areas, schools and other public buildings. | |
| Policy TP03 - Cycling | The Council will seek the provision at the earliest opportunity of a network of cycle routes. Development that would prejudice the | |

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| | safety of existing or implementation of proposed cycle routes will not be permitted.<br><br>New development will be expected to consider the need for the safety of cyclists and incorporate facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals.<br><br>Substantial development generating travel demand will be expected to provide convenient cycle parking and changing facilities. | the Proposed Project. The Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15). However, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. The likely impact of the Proposed Project on PRoW Diversions is considered to be not significant. |
| Policy TP10 - Traffic Management | Development required to implement traffic management measures designed to realise the best use of the highway network in terms of safety, traffic capacity and environmental conditions will be approved. | |

# Appendix Table C.6 Dover District Council, Dover District Local Plan (Adopted October 2024)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| SP1 - Planning for Climate Change | The Council will seek to ensure that all new built development contributes to the mitigation of, and adaptation to, climate change through:<br>Mitigation<br>a Including low-carbon design approaches to reduce energy consumption in buildings;<br>b Utilising sustainable construction techniques and optimising resource efficiency;<br>c Incorporating renewable and low-carbon technologies;<br>d Providing opportunities for decentralised energy and heating;<br>e Maximising green infrastructure; and<br>f Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.<br><br>Adaptation<br>g Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing the potential for increased greenhouse gas emissions in doing so; | The Proposed Project contributes to the mitigation of and adaptation to climate change in accordance with this policy.<br><br>**Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **the Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target, and as such can itself be classed as mitigation of climate change.<br><br>It also includes a number of mitigation measures in its design including utilising sustainable construction techniques and optimising resource efficiency and incorporating renewable and low carbon technologies, as set out below.<br><br>**Application Document 6.2.5.1 Part 5 Project Wide Effects Chapter 1 Climate Change** presents an assessment of the likely significant effects of the Proposed Project on the climate and climate change effects that affect the Proposed Project and surrounding environment. Embedded mitigation measures have been integral in reducing, and where possible avoiding, the climate change effects of the Proposed Project. These measures include sensitive |

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| | h Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;<br>i Improving water efficiency; and<br>j Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding. | routeing and siting of infrastructure and temporary works, use of low carbon construction techniques, use of materials with a low embodied carbon and commitments made within the **Register of Environmental Actions and Commitments (REAC) (Application Document 7.5.3.2 CEMP Appendix B)**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>The Proposed Project also includes adaptation measures such as ensuring that development is designed to reduce vulnerability to and provide resilience from the impacts arising from climate change, whilst not increasing the potential for increased greenhouse gas emissions in doing so**.**<br><br>A **Greenhouse Gas Management Plan** (**Application Document 7.5.13)** has been prepared and sets out how Greenhouse Gas (GHG) emissions are to be managed across the lifecycle of the Proposed Project. This plan includes the identification of opportunities for reducing GHG emissions, GHG reduction targets and allocation of responsibilities for associated actions, as secured by Requirement 5 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>The Lifecycle GHG Assessment has considered all GHG emissions from within the Order Limits arising during all stages of the construction, operation and decommissioning, as well as emissions from off-site |

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| | | activities. The Proposed Project will result in increased GHG emissions during construction and operation, which are estimated to contribute less than 0.01% of any respective UK carbon budget. The effect of the Proposed Project on the global climate is deemed to be minor adverse and not significant, because the Proposed Project's GHG impacts would be fully consistent with applicable with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Proposed Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels.<br><br>The Climate Change Resilience Assessment, found within **Application Document 6.2.5.1 Part 5 Project Wide Effects Climate Change**, considers the impacts of climate change on the Proposed Project over its lifetime by identifying likely changes to the climate and potential climate hazards (including, increase winter precipitation, increase frequency and severity of extreme weather events, sea level rise and drought). This assessment has found that there are no significant climate change risks to the Proposed Project, assuming the embedded mitigation measures are successfully implemented into the design. The effect of climate change risk on the Proposed Project is therefore deemed to be not significant.<br><br>The FRA **(Application Document 6.8)** demonstrates that the Sequential Test and Exception Test have been applied and satisfied, and concludes that with |

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| | | mitigation the Proposed Project will be safe from flooding throughout its lifetime without increasing flood risk elsewhere, taking into account climate change impacts required by paragraph 5.8.12 of NPS EN-1. Flood risk management measures identified would be secured through the CEMP (A**pplication Document 7.5.3.2 CEMP Appendix B REAC**) and Requirement 6 of Schedule 3 of A**pplication Document 3.1 draft DCO**. |
| SP2 - Planning for Healthy and Inclusive Communities | The Council will support the creation of healthy, inclusive and safe communities in the District by:<br>1 Ensuring that new development is well served by services and facilities (for example education, health and social care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.<br>2 Creating opportunities for better active travel, to promote physical health, including provision for safe cycle and pedestrian routes.<br>3 Protecting against the loss of existing community facilities, allowing for the expansion or enhancement of existing community facilities, promoting the dual use and co-location of services in accessible places and requiring new developments to provide for the needs of their new communities.<br>4 Ensuring that new developments are designed to be safe and accessible, to minimise the fear of crime and improve public safety. | The Proposed Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified:<br><br>(2) The Proposed Project avoids and/or mitigates all long-term significant effects on PRoW during operation, and although the Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15), it has been designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. This includes increasing green infrastructure opportunities and providing permissive access across the Saxmundham Converter Station site and establishing an attractive amenity value for users of the permanent PRoW diversions. In addition, the Proposed Project also safeguards land within the design for future improvements to PRoW.<br><br>(3) The Proposed Project would also have limited effects on existing community facilities and would not |

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| | 5 Promoting social interaction and inclusion in new developments through the provision of high-quality, people-focused spaces that are convenient and welcoming with no barriers to access, and that can be used by all.<br>6 Supporting the delivery of cultural infrastructure and public art projects to create a sense of place and identity in both new and existing communities.<br>7 Ensuring that all new development achieves a high standard of design both internally and externally, and that developments are designed to be resilient to climate change.<br>8 Seeking to improve the District's air quality, reducing public exposure to poor air quality and minimising inequalities in levels of exposure to air pollution.<br>9 Ensuring improved access to and quality of greenspaces, the provision of new green infrastructure, and spaces for play, recreation and sports. | preclude the expansion or enhancement of these facilities during the operational period. Social infrastructure, local accommodation facilities and local businesses are assessed within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism**. Great Oaks Small School, St Augustine's and Stonelees Golf Clubs, and Chai Stop Takeaway and Kent Waterjet Cutting are expected to be impacted during the construction of the Kent Onshore Scheme. However, the effects are considered negligible due to the proposed mitigation measures and temporary and infrequent nature of the works. No other significant effects are expected to impact any other recreational or tourist facilities.<br><br>(7) In terms of design, the **Application Document 7.3 Design Development Report, Application Document 7.11.2 Design Approach Document – Kent and Application Document 7.12.2 Design Principles - Kent** provide a full account of the design process, demonstrating how through good design the Proposed Project will result in the creation of a sustainable development and explains how National Grid has considered both functionality and aesthetics having regard to the amenity and visual impacts. In addition, as set out in National Grid's response to Policy SP1 above, the Proposed Project has been designed to be resilient to climate change. |

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| | | (8) **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assess the likely air quality effects that would result from the Onshore Schemes and consider the existing baseline conditions and the likely changes and effects to air quality levels during the construction, operation and maintenance and decommissioning phases. The assessments confirm there would not be a deterioration in air quality or substantial changes in air quality levels and therefore not expected to have significant adverse effects upon air quality. The Onshore Scheme would also not lead to a breach of any national air quality limits or statutory air quality objectives.<br><br>(9) National Grid has taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent,** as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**) includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)**for the Kent Onshore |

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| | | Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report f**or the Kent Onshore Scheme, National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. |
| SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets | International Sites<br>a Development which is likely (either individually or in combination with other developments) to adversely affect the integrity of an international or European designated site, including the Dover to Kingsdown Cliffs SAC, the Lydden and Temple Ewell Downs SAC, the Thanet Coast and Sandwich Bay SPA, the Thanet Coast and Sandwich Bay Ramsar Site and the Sandwich Bay SAC, will not be permitted unless there are imperative reasons of | **International Sites**<br>The Order limits pass through or are located close to a number of designated European conservation sites, including Sandlings SPA, Outer Thames Estuary SPA, Alde-Ore Estuary SPA/Ramsar site, Southern North Sea SAC and Thanet Coast and Sandwich Bay SPA/Ramsar site.<br><br>**Application Document 6.6 Habitats Regulations Assessment Report** is provided with the DCO |

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| | overriding public interest and that it is demonstrated that any necessary compensatory measures in the absence of alternative solutions can be secured. A 'project level' Habitats Regulations Assessment will be required where there are likely significant effects or uncertainty. Any mitigation measures necessary to ensure no adverse impact must be implemented at the required time.<br>b Measures to mitigate against an increase in recreational pressure arising from development resulting in impacts to the Thanet Coast and Sandwich Bay SPA are addressed in the Strategic Access Mitigation and Monitoring Strategy, for which contributions are required in accordance with Policy NE3.<br>c For development within 500m of the Thanet Coast and Sandwich Bay SPA and Ramsar sites the need for a project level assessment, in accordance with the Habitats Regulations, will be assessed on a case-by-case-basis to ensure that any proposal will not adversely affect the integrity of these sites, with specific regard to non-physical disturbance (e.g. noise, vibrations and light spill).<br>In addition, all development within 500m will also be required to demonstrate the provision of suitable best practice construction measures, including detailed site-specific working methods and sensitive timings of work, as part of a Construction Environmental Management Plan.<br>d Wintering bird surveys will be required for all sites with high or moderate suitability (as identified in the | Application. The HRA assesses the potential for the Proposed Project to result in likely significant effects (LSEs) on the integrity of European sites. Several potential pathways for LSEs on European Sites were identified and screened in for Appropriate Assessment. These pathways related (inter alia) to dust, noise and visual disturbance, loss of functionality-linked land during, EMF emissions and underwater noise during construction and decommissioning and collision risk for vulnerable species during operation (Kent Onshore Scheme).<br><br>Following Appropriate Assessment, and consideration of mitigation options which form part of the committed design of the Proposed Project and are proposed to be secured by requirements included in Schedule 3 of the draft DCO **(Application Document 3.1 draft DCO**), it is concluded that the Proposed Project, both alone an in combination with other plans and projects, is not predicted to result in any adverse effect on the integrity of any European sites. No derogation is considered necessary.<br><br>**The Application includes Application Document 7.5.3.2 Outline Onshore CEMP** and **Application Document 7.5.3.1 Outline Onshore CEMP** which demonstrates the provision of suitable best practice construction measures, including detailed site-specific working methods and sensitive timings of work. |

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| | HRA or subsequent habitat assessment) for qualifying bird species of the Thanet Coast and Sandwich Bay SPA, in order to determine their individual and cumulative importance for these species and whether the thresholds of significance are exceeded (greater than 1% of the associated European or international site). In such circumstances, when impacts cannot be avoided, appropriate mitigation in the form of habitat creation and management in perpetuity on-site in the first instance, or through provision of strategic sites for these species elsewhere within Dover District, will be required. Permission will only be granted when proposals for appropriate, adequate and achievable mitigation measures have been agreed. All such necessary mitigation will need to be fully functional prior to any development which would affect significant numbers of SPA birds.<br><br>The Kent Downs AONB and Heritage Coasts<br>All proposals within, or affecting the setting of, the AONB and Heritage Coasts must have regard to the purpose of conserving and enhancing their natural beauty in accordance with the requirements of Policy NE2.<br><br>Nationally designated biodiversity sites<br>For nationally designated biodiversity sites, including Sites of Special Scientific Interest, National Nature Reserves and Marine Conservation | Mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans** (Sheet Six) for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas,** as secured by **Application Document 7.5.3.2 CEMP Appendix B REAC**, as part of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>Wintering bird surveys have been undertaken and can be found in **Application Document 6.4.3.2.B Kent Wintering Birds 2022-2023** and **Application Document 6.4.3.2.C Kent Wintering Birds 2023-24**. The results of the surveys are set out in **Application Document 6.3.3.2.B ES Appendix 3.2.B Wintering Bird Survey Report 2022-2023** and **Application Document 6.3.3.2.C ES Appendix 3.2.C Wintering Bird Survey Report 2023-24.**<br><br>The Proposed Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved |

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| | Zones, development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests (either individually or in combination with other developments) unless the benefits of the development in the location proposed clearly outweigh the impacts that it is likely to have on the features of the designated site that make it of national importance, and any broader impacts on the national network of sites. Where damage to a nationally designated site cannot be avoided or mitigated, compensatory measures will be sought. Development will also accord with and support the conservation objectives of any biodiversity site management plans.<br><br>Irreplaceable habitats<br>Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in wholly exceptional circumstances, where the public benefit would clearly outweigh the loss or deterioration, and where a suitable compensation strategy exists.<br><br>Locally designated environmental sites<br>For locally identified biodiversity and geological assets, including Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves, as well as priority and locally important habitats and priority species, including chalk | through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of **Application Document 3.1 draft Development Consent Order.**<br><br>**The Kent Downs AONB and Heritage Coasts**<br>No element of the Kent Onshore Scheme is located within an AONB or will have an impact on an AONB. No element of the Kent Onshore Scheme is located within a Heritage Coast or will have an impact on a Heritage Coast.<br><br>**Nationally designated biodiversity sites, irreplaceable habitats, locally designated environmental sites**<br>As noted above, the Proposed Project avoids and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases.<br><br>**The Mitigation Hierarchy**<br>As set out in **Application Document 6.2.3.3 Part 3 Kent Chapter 2 Ecology and Biodiversity**, the Proposed Project has been designed, as far as |

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| | grasslands, development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site and when the coherence of the local ecological network is maintained. Compensation will be sought for loss or damage to locally identified biodiversity assets.<br><br>The Mitigation Hierarchy<br>Development affecting designated sites and biodiversity assets, including protected and priority species, will apply the mitigation hierarchy as required by the NPPF;<br>All mitigation, compensation and enhancement measures should have regard to the requirements of Policy SP14, the Dover District Green Infrastructure Strategy and the Local Nature Recovery Strategy. | possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Proposed Project.<br>The mitigation, compensation and enhancement measures proposed have had regard to the requirements of Policy SP14, the Dover District Green Infrastructure Strategy and the Local Nature Recovery Strategy.<br><br>**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme.<br>Embedded mitigation measures have been applied to reduce, and where possible avoid, landscape and visual effects of the Proposed Project. Measures that have been incorporated include:<br>• Sensitive routing and siting of infrastructure and temporary works;<br><br>The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in response to the Design Principles presented in **Application Document 7.12.2 Design Principles – Kent**; and an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering |

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| | | landscape and biodiversity mitigation as well as biodiversity net gain. |
| SP14 - Enhancing Green Infrastructure and Biodiversity | a Measures that conserve and enhance the green infrastructure and biodiversity of the District through the management, restoration and creation of habitats in line with the priorities set out in the Local Nature Recovery Strategy, the Kent Biodiversity Strategy for the Biodiversity Opportunity Areas (BOAs) in the District and in the Dover District Green Infrastructure Strategy will be supported.<br>b Where possible, every development (excluding householder) will be required to connect to and improve the wider ecological networks in which it is located, providing on-site green infrastructure that connects to off-site networks. Proposals must safeguard features of nature conservation interest, and retain, conserve and enhance habitats, including internationally, nationally and locally designated sites, irreplaceable and priority habitats and species, networks of ecological interest, ancient woodland, chalk grasslands, water features, hedgerows, beaches, wetland pastures and foreshores, as green and blue corridors and stepping-stones for wildlife.<br>c Development should ensure that the integrity of the existing network of green infrastructure,<br>including the hierarchy of designated sites, the Local Nature Recovery Network and Biodiversity Opportunity Areas across the District is | In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent**, as secured by **Application Document 7.5.3.2 CEMP Appendix B REAC**, as part of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**) includes habitat creation, including balancing ponds around the balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br><br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)**for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by **Application Document 7.5.3.2 CEMP Appendix B REAC**, as part |

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| | strengthened as part of proposals, in order to increase the contribution to health and wellbeing, carbon sequestration and resilience to climate change delivered by such green infrastructure.<br>d All development must avoid a net loss of biodiversity and will be required to achieve a net gain in biodiversity above the ecological baseline in line with Policy NE1. | of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**.<br><br>As detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report f**or the Kent Onshore Scheme, National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies**.** |
| SP15 - Protecting the District's Historic Environment | The heritage assets of the District are an irreplaceable resource and all applications that will affect a heritage asset should therefore ensure that the asset, including its setting, are conserved and enhanced in a manner appropriate to their significance. The Council will work with applicants and partners to ensure that the heritage of the District can positively contribute to the character, environment and economy of the District and the quality of life of existing and future generations of residents and visitors. | **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** report the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets<br><br>Mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent** |

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| | | **Onshore oWSI (Draft)** and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.<br><br>**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets. The Heritage Statement (Appendix E of this Planning Statement) concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes that the Kent Onshore Scheme would result in less than substantial harm, at the lower end of the spectrum, to one non-designated heritage asset of schedulable quality and one designated heritage asset.<br><br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of **Application Document 7.1 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| CC1 - Reducing Carbon Emissions | Proposals for new buildings must demonstrate how energy efficiency and a reduction in carbon emissions has been incorporated into the proposed | The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in |

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| | building design. In particular, the following measures must be considered:<br>a Use of good fabric standards that reduce heat and energy needs;<br>b The use of on-site renewable and low-carbon energy technologies;<br>c Measures (such as the arrangement of rooms, and orientation, size and position of windows) to utilise and control solar gains, including the position and permanence of solar shading features;<br>d Measures to promote natural ventilation. | response to the Design Approach Document (**Application Document 7.11.2 Design Approach Document – Kent**) and the Design Principles presented in **Application Document 7.12.2 Design Principles - Kent**. The Design Principles provide guidance regarding the design intent and design principles that will be adopted and embedded into the detailed proposals of these structures.<br><br>In response to point (d) and the provision of green infrastructure, an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and biodiversity mitigation (**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. This outline strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. It has been developed as part of the iterative process of design and assessment.<br><br>Site waste shall be managed in a structured and auditable manner in accordance with the agreed SWMP, from the commencement of the Proposed Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In |
| CC2 - Sustainable Design and Construction | In order to mitigate and adapt to the effects of climate change all new development involving the construction of new buildings should demonstrate how they will satisfy the following criteria:<br>a Provide measures to improve the energy efficiency of buildings in accordance with Policy CC1 and, where relevant, also utilise whole development layout, orientation, massing and landscaping to make the best use of solar energy, passive heating and cooling, natural light and natural ventilation;<br>b Prioritise the use of low embodied carbon and energy efficient building materials and construction techniques;<br>c Consider the lifecycle of the building and any associated public spaces, including how they can be easily modified to meet changing social and | |

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| | economic needs and how materials can be recycled at the end of their lifetime;<br>d Provide measures to adapt to climate change, including the provision of water efficiency measures in accordance with Policy CC4, green infrastructure in accordance with Policies CC8, PM1 and PM3 and Strategic Policies SP2 and SP14, Sustainable urban Drainage Systems (SuDS) in accordance with Policy CC6, suitable shading of gardens and other open spaces, rainwater harvesting, drought resistant landscaping; and in the case of major developments, the shading of pedestrian routes and the provision of opportunities for growing food; and<br>e Minimise waste and promote recycling, during both construction and occupation. | addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. Further details on Construction Waste are found in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.**<br><br>Measures the Proposed Project has taken to adapt to climate change are set out in the National Grid's response to Policy SP1 above. |
| CC3 - Renewable and Low Carbon Energy Development | New development is encouraged to maximise opportunities for renewable energy by producing, storing and using renewable energy on-site. The Council will also take positive account of, and support development that provides further energy reductions, efficiencies, or delivers retrofitted renewable and low carbon energy measures on or near existing development sites, where measures comply with other policies of the Plan. The Council will encourage the use of previously developed land to provide renewable energy generation or storage to support new and existing development. Development to generate energy from renewable and low carbon sources will be supported where it is demonstrated that: | **Application Document 7.2 Strategic Options Back Check Report** and Section 5 of **Application Document 7.1 Planning Statement** explain that the Proposed Project is one of the essential network reinforcements needed to deliver the UK's net zero target. 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. Sea Link would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately net zero.<br><br>a) The wider socio-economic benefits of the Proposed Project are set out in **Application** |

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| | a The environmental, social and economic benefits of their proposals are made clear;<br>b It will not result in significant harm to the surrounding area, landscape character, natural or heritage assets, habitats, biodiversity, or wildlife (particularly protected species), having special regard to the natural beauty of the Kent Downs AONB;<br>c There is no significant loss of amenity to local residents by virtue of visual impact, noise, disturbance or odour;<br>d The proposals will conserve and enhance the natural environment through measures such as improvements to biodiversity;<br>e There is no significant loss of the best and most versatile agricultural land, unless it can be demonstrated that no alternative lower-grade land is available;<br>f It will not result in an unacceptable impact on the local transport network that cannot be satisfactorily mitigated; and<br>g Any fuel required is sustainably sourced. | **Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism.**<br>b) **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme. Landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible.<br>**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** presents the assessment of the likely significant cultural heritage effects that could result from Proposed Project. The effects are summarised in Section 7.5 of the Planning Statement.<br>c) **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** presents the assessment of likely significant effects from Noise and Vibration. With mitigation noise effects can be reduced to not significant.<br>d) **Application Document 6.2.3.3 Part 3 Kent Chapter 2 Ecology and Biodiversity** present the assessment of the likely significant ecology and biodiversity effects that could result from the |

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| | | Proposed Project. The effects are summarised in Section 7.4 of the Planning Statement.<br>e) As set out in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils**, a total permanent land take of 12.27 ha is required, of which 12.21 ha is graded as BMV land.<br>Mitigation measures to minimise the impact to BMV land and impacts to soil health are set out in **Application Document 7.5.3.2 CEMP Appendix B REAC** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br>f) The assessment presented in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** conclude that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Ken**t. These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during |

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| | | construction are set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent.** |
| CC5 - Flood Risk | Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted where it is demonstrated by a site-specific Flood Risk Assessment (FRA), (having regard to the requirements set out in the Council's Strategic Flood Risk Assessment), that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.<br>The FRA should have regard to the guidance set out in the Council's Site Specific Guidance for Managing Flood Risk (as updated). For development identified by the FRA to be at risk of flooding from any source, flood mitigation should have regard to the Flood Risk Management hierarchy outlined in the document 'Site-specific Guidance for Managing Flood Risk'.<br>Where development does go ahead in Flood Zone 3, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the design flood level respectively, including an allowance for climate change. | The Kent Onshore Scheme is situated in the hydrological catchment of the River Stour. The River Stour is a designated main river that rises as the Great Stour in Lenham and flows towards and through Canterbury, where it becomes tidal, finally discharging to the sea at Pegwell Bay. The river has extensive areas of floodplain, designated as Environment Agency Flood Zone 3, with some areas mapped as benefitting from flood defences.<br>The Flood Risk Assessment (FRA) (**Application Document 6.8 Flood Risk Assessment**) and supporting assessments and hydraulic modelling confirm that the Proposed Project, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Proposed Project, taking into account climate change. The Proposed Project is committed to incorporating Sustainable Drainage Systems (SuDS) to management construction and operational drainage. Further details are set out in the **Outline CoCP (Application Document 7.5.3.1**) as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** |
| CC6 - Surface Water Management | All new development should replicate natural ground and surface water flows and decrease surface water runoff through the use of Sustainable urban Drainage Systems, having regard to the Council's Site-specific Guidance for Managing Flood | The FRA (**Application Document 6.8 Flood Risk Assessment**) has had regard to the guidance set out |

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| | Risk (as updated) and in accordance with the following criteria:<br>a Proposals must follow the hierarchy of methods for discharge as set out below:<br>i Into the ground, infiltration: the preferred method for discharging surface water runoff<br>ii To a surface water body, subject to appropriate pollution control measures<br>iii To a surface water sewer, highway drain or another drainage system<br>iv To a combined sewer<br>b SuDS design and a robust long-term maintenance plan must be considered as an integral part of the master-planning and design process, and should, where possible, provide multi-functional benefits;<br>c No surface water connection to a foul-only sewer will be permitted;<br>d The discharge of surface water runoff into a public surface or combined sewer will only be acceptable if infiltration or discharge into a surface water body are shown not to be possible, an assessment of the capacity of the sewer has been undertaken, and the evidence demonstrates that there is no increased flood risk;<br>e In Ground Water Source Protection Zones 1 and 2 SuDS will only be permitted if adequate safeguards against possible contamination are provided or where it can be demonstrated than there will be no | in the Council's Site Specific Guidance for Managing Flood Risk (as updated).<br><br>A sequential approach has been applied in selecting the land for the Proposed Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. Evidence of passing the Sequential Test is presented in the FRA (**Application Document 6.8 Flood Risk Assessment**) and application of the Exception Test is unnecessary for this Proposed Project.<br><br>**Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline COCP** sets out the good practice measures, including SuDS, that are proposed for managing surface water flood risk. As per good practice measure W12, where new permanent impermeable areas are created, drainage would be designed in accordance with the requirements of policy and guidance requirements of the relevant Lead Local Flood Authorities and will include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. |

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| | environmental risks to water quality and adequate mitigation measures can be implemented;<br>For major development, the following criteria also apply:<br>f Drainage must be integrated into on-site multifunctional open space and landscape provision;<br>g Proposals should be informed by guidance produced by the Lead Local Flood Authority; and<br>h Approval for the design and long-term maintenance of SuDS will be required prior to the development being permitted.<br>Where SuDS are required, a Sustainable Drainage Strategy containing proportionate information on the proposed sustainable drainage systems must be submitted as part of any planning application. | |
| CC7 - Coastal Change Management Areas | Within the Coastal Change Management Areas (as identified on the Policies map):<br>1 Permanent new development will not be permitted.<br>2 Temporary development may be granted time-limited planning permission provided that it is demonstrated that the development:<br>a Requires a coastal or clifftop location;<br>b Will be safe and will not increase the risk to life during its planned lifetime;<br>c Provides wider sustainability benefits; and | The Proposed Project is not located within a Coastal Change Management Area as identified on the Policies map. |

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| | d Will not exacerbate rates of coastal change anywhere on the coastline.<br>3 Householder applications (including extensions, outbuildings and alterations to existing dwellings)<br>in CCMAs may be permitted provided it is demonstrated that the development:<br>a Will be safe and will not increase the risk to life during its planned lifetime;<br>b Will not exacerbate rates of coastal change anywhere on the coastline.<br>4 Ponds, swimming pools, septic tanks and sewage treatment plants will not be permitted.<br>5 The uncontrolled discharge or disposal of water onto the ground will not be permitted, and the management of surface water using infiltration/soakaways is unlikely to be supported.<br>All applications for development in CCMAs (including temporary and householder) must be supported by a coastal change vulnerability assessment and geotechnical appraisal, undertaken by suitably qualified persons, to demonstrate the above requirements (where relevant) can be met. | |
| CC8 - Tree Planting and Protection | Tree Planting<br>a A minimum of two new trees will be required to be planted for each new dwelling (this does not apply to applications for conversions and changes of use to residential), and a minimum of one new tree will be required to be planted for every 500 sq.m of new commercial floorspace created. | An **AIA (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO,** has been undertaken which considers the likely direct and indirect arboricultural impacts of the Proposed Project on trees within or immediately adjacent to the Order limits. |

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| | b Trees should be native Kent species, of local provenance from a bio-secure source, and should be standard size in specification as a minimum.<br>c A presumption that the trees will be planted on-site rather than off-site will apply. For major development where it is demonstrated that new trees cannot be provided on-site, a financial contribution will be required towards the planting of trees off-site having regard to the Council's Green Infrastructure Strategy.<br>d A detailed landscaping scheme and landscape management plan should be submitted for all major development schemes, including, but not limited to, details of the trees and shrubs to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development.<br>Tree Protection and Replacement<br>e Dover District Council will make Tree Preservation Orders (TPOs) when necessary in order to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity.<br>f Development involving the loss of or damage to a tree, group of trees or areas of woodland that are designated as being of significant amenity, biodiversity or historic value in the Council's Green Infrastructure Strategy will only be permitted when the benefits of the development clearly outweigh the benefits of their retention and the applicant has demonstrated that no alternatives are available. | For the Kent Onshore Scheme, the **AIA (Application Document 6.10)**, as secured by Requirement 8 of Schedule 6 of **Application Document 3.1 draft DCO,** concludes that in total, 3 individual trees of moderate quality; and 5 individual trees, 10 tree groups, 5-part tree groups, 1 hedgerow and 1 part hedgerow of low quality are likely to be removed to facilitate the Proposed Project. No veteran or ancient trees are to be removed and no trees subject to TPO are to be removed.<br>The impacts of tree removals will be compensated through the proposed tree planting and associated landscaping works which will represent an opportunity to enhance the quality, benefits and resilience of trees within the Kent Onshore Scheme Order Limits. New tree planting is detailed in **Application Document 7.5.7.2 oLEMP– Kent and Application Document 7.5.7.2.1 Minster Converter Station and Substation Outline Landscape Mitigation**, as secured by requirements of Schedule 3 of **Application Document 3.1 draft DCO** which requires detailed management plans to be submitted and approved by the relevant Local Planning Authority.<br>Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** The following measures |

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| | g Trees protected by Tree Preservation Orders should be retained wherever possible, unless:<br>i it is demonstrated by an arboriculturist report that they are dead, dying, diseased or represent<br>a hazard to public safety; or<br>ii The Council deems the felling to be acceptable with regards to the Council's policy on tree management; or<br>iii The benefit of the proposed development outweighs the benefit of their retention.<br>h If felling is deemed acceptable by parts (f) or (g) then the planting of two replacement trees for each tree felled in an appropriate location will be required. | have been taken into account regarding trees as part of the Kent Offshore Scheme:<br>• LV01: The contractor(s) will retain vegetation where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with land rights required for operational safety, native shrub planting approved by National Grid will be used as a replacement, in accordance with the outline vegetation reinstatement plans included within the LEMP;<br>• LV02: The contractor(s) will apply the relevant protective principles set out in British Standard (BS) 5837:2012: Trees in relation to design, demolition and construction. This will be applied to trees within the Order Limits which will be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction. All works to high grade trees, including trees under Tree Preservation Orders and veteran trees, will be undertaken or supervised by a suitably qualified arboriculturist. |
| PM1 - Achieving High Quality Design, Place Making and | All development in the District must achieve a high quality of design, that promotes sustainability, and fosters a positive sense of place, by responding to the following principles in an integrated and | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset. |

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| the provision of Design Codes | coherent way. Development which is not well-designed will not be supported. Where relevant and appropriate to the proposal under consideration, new development must:<br>1 Context and Identity<br>a Demonstrate an understanding and awareness of the context of the area (including existing important views, the potential for creating new views, and historic and architectural character), appreciate existing built form and respond positively to it.<br>b Be well designed paying particular attention to scale, massing, rhythm, layout, and use of materials appropriate to the locality.<br>c Be compatible with neighbouring buildings and spaces (including public and private spaces, green and urban spaces, spaces between and around buildings - taking into account purpose and function, access and linkages, uses and activities, comfort, image and sociability).<br>d Respect and enhance character to create locally distinctive design or create character where none exists.<br>e Have a positive and coherent identity that everyone can identify with, and be visually attractive.<br>f Demonstrate the appropriateness of the proposed design response. Appropriate design responses can range from repeating or reinterpreting local building patterns through to abstract forms which blend in with the prevailing streetscape/landscape. Where | The **Design Development Report** (**Application Document 7.3**) provides an overview of the design rationale for the Proposed Project and how the design choices have sought to reduce the environmental effects of the Proposed Project. It demonstrates that the design has embedded mitigation measures in order to avoid or reduce significant environmental effects where practicable.<br><br>**Application Document 7.12.2 Design Principles – Kent** have been prepared to accompany the Application, which provides the guiding principles for the detailed design of the Kent Onshore Scheme part of the Proposed Project.<br><br>Design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles and site-specific design principles.<br><br>The site-specific design principles for the converter station sites in Kent provide guiding principles for the detailed design for these elements of the Proposed Project. As specified in Requirement 3 Schedule 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for |

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| | relevant, developments should draw inspiration from traditional building forms to inform contemporary designs and materials.<br>g Take an integrated approach to the design process, from the project inception, where place making and sustainable development are considered as one.<br>2 Built Form<br>a Make efficient use of land and promote compact forms of development that are walkable, and have access to local public transport, facilities and services.<br>b Be of an appropriate density (typically between 30 - 50 net dwellings per hectare) that combines the efficient use of land with high-quality design that respects character and context. Higher density development will be encouraged in sustainable and accessible locations, such as around transport hubs or town centres, where this is appropriate. Lower density development may be appropriate in edge-of-settlement locations.<br>c Incorporate focal points and destinations to create a sense of place and make it easy for anyone to find their way around.<br>d Make a positive contribution to the visual character of the area, with the aim of creating a sense of harmony and visual continuity between the existing area and proposed development.<br>e Be inclusive in its design for all users.<br>4 Nature | confirmation that they are in general accordance with the site-specific design principles.<br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide oversight of the ongoing design process and delivery of the Proposed Project. The key responsibilities of the design champion are set out in **Application Document 7.11.2 Design Principles – Kent.**<br>An explanation of how the design of the converter station site responds to its wider context is presented in **Application Document 7.11.2 Design Approach Document – Kent.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel. |

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| | a Demonstrate an understanding of the local landscape context and bring green and blue infrastructure into streets, open and public spaces.<br>b Ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in the development in line with Policy CC8.<br>c Provide high quality multi-functional green open spaces with a variety of landscapes and activities, including play, that also deliver enhanced biodiversity and flood mitigation.<br>d Ensure that open spaces are designed to be resilient to climate change and adaptable over time so that they remain fit for purpose and are managed and maintained for continual use.<br>e Support habitat conservation and creation for wildlife, for example through the creation of wildlife corridors, hedgehog highways,<br>6 Homes and Buildings<br>a Ensure that the siting, layout and design of vehicle and cycle parking (including detached garage blocks) is sensitively integrated into the development so as not to dominate the landscape, maintains an attractive and coherent street scene, does not prejudice the wider functionality of public and private space, and creates an effective functional link and relationship with the buildings and areas they serve. To achieve this a range of parking solutions are likely to be required to avoid the dominance of frontage parking. | Part 6 of this policy has not been addressed as it related to Home and Buildings and is therefore not applicable to the Proposed Project. |

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| | b Ensure a tenure-blind approach to housing development to ensure that new developments<br>contribute to the creation of mixed and inclusive communities. vision of swift bricks, bat roosts and bee bricks.<br>c Make appropriate provision for service areas, refuse storage (including waste and recycling bins), and collection areas in accordance with the nature of the development. Such areas and access to them should be appropriately sited and designed to ensure they can:<br>i Perform their role effectively without prejudicing or being prejudiced by other functions and users;<br>ii Maintain an attractive and coherent street scene and protect visual amenity; and<br>iii Avoid creating risk to human health or an environmental nuisance.<br>d Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. This should include ensuring that there is appropriate consideration for residents to be able to segregate their waste to allow for recycling opportunities, including those who live in apartments.<br>7 Lifespan<br>a Be designed to add to the overall quality of the area, not just for the short term but over the lifetime of the development. | |

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| | b Be designed and planned to last and be well-managed and maintained through long-term stewardship models.<br>c Be adaptable to their users' changing needs and evolving technologies, including enabling opportunities for home-working.<br>d Be robust, easy to use and look after, and enable their users to establish a sense of ownership.<br>To support the delivery of high-quality buildings and<br>Development proposals must provide evidence, through their design and access statements, to demonstrate how they have responded positively to the design policies in the Local Plan and associated guidance, including national and local design guidance, local Design Codes and the National Model Design Code, relevant Neighbourhood Plans, Village Design Statements, Conservation Area Appraisals, site-specific development briefs, the Kent Design Guide, Secured by Design Guidance and where appropriate the Kent Downs AONB Landscape Design Handbook.<br><br>Where significant design implications are identified on major proposals these will be referred to a<br>Design Review Panel. | |
| TI1 - Sustainable Transport and Travel | Development should, in so far as its size, characteristic and location: | There will be no significant adverse effects on pedestrians, equestrians or cyclists during construction, operation and decommissioning of the |

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| | a Be designed so that opportunities for sustainable transport modes are maximised and provide for a variety of forms of transport as alternatives to travel by private motorised vehicle;<br>b Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles;<br>c Be readily accessible by sustainable transport modes through the provision of high-quality, engineered, safe and direct walking and cycling routes within a permeable site layout;<br>d Contribute to sustainable transport proposals including off-site improvements to cycling and walking routes and public transport facilities, and to proposals within the Dover Infrastructure Delivery Plan; and<br>e Make provision for secure cycle parking and storage having regard to the Parking Standards for Kent SPD and Kent Design Guide Review.<br><br>The Council will safeguard the Public Rights of Way network, and other existing cycle and walking routes, from development that would compromise their use and will encourage their enhancement and extension. | Proposed Project. The Proposed Project is expected to generate a very low level of vehicle movements during the operational and maintenance phase as discussed in Section 4 of this Planning Statement and therefore this has not been scoped out of the assessment.<br><br>The Proposed Project avoids and/or mitigates all long-term significant effects on PRoW during operation, and although the Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15), it has been designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public.<br><br>A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**, explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project. The Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public, resulting in no significant impacts during construction or decommissioning. |

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| TI2 - Transport Statements, Assessments and Travel Plans | Developments that would generate significant traffic movements must be well related to the primary and secondary road network. Proposals which would generate levels and types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted.<br><br>New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation.<br><br>Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.<br><br>A Transport Statement, Transport Assessment and/or a Travel Plan may be required depending on the nature and scale of the proposal and the level of significant transport movements generated, the requirements of which will be secured by planning condition or Section 106 legal agreement. | The assessment of traffic generated during construction, operation and decommissioning of the Proposed Project will not result in significant adverse effect on either the strategic (SRN) or local road networks.<br><br>Any non-significant impacts would be temporary and would be managed through the measures set out in the outline plans are provided as part of the application submission (**Application Document 7.5.1.2 OCTMP-Kent**) with detailed plans to be brought forward under Schedule 3 Requirement 6 of **Application Document 3.1 draft DCO** to be substantially in accordance with the OCTMP. This includes travel planning measures which will be directed at construction staff, management of HGV's and Abnormal loads.<br><br>The assessment presented in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** conclude that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction.<br><br>Measures to manage construction traffic impacts are set out in the **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan- Kent,** secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.** These documents also explain the approach to travel planning for construction staff including promoting |

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| | | walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in **Application Document 7.5.9.2 Outline PRoWMP – Kent,** secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO.**<br><br>A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Proposed Project. The Outline PRoWMP (**Application Document 7.5.9.2 Outline PRoWMP – Kent**) secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO,** explain the details of the temporary short term diversions and appropriate measures for the management of PRoW during the various stages of the Proposed Project. The Proposed Project is expected to result in the permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15). However, the Proposed Project is designed to minimise adverse or repeated impacts on the PRoW network and to provide benefits to the public. |
| NE1 - Biodiversity Net Gain | 1 Development proposals must provide a minimum of 10% biodiversity net gain (BNG).<br><br>2 Proposals for BNG should be delivered on-site, taking into account local green infrastructure priorities set out in the Local Nature Recovery Strategy, the Dover District Green Infrastructure Strategy and the Kent Biodiversity Strategy. Only if it can be demonstrated that ecologically meaningful BNG that contributes to the local green | As per 4.6 of NPS EN-1 biodiversity net gain is not a legal obligation for NSIPs and therefore the Proposed Project is not required to achieve 10% BNG. However, as detailed in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, the Kent Onshore Scheme, a net loss is proposed for Area units for Hedgerow Units and for watercourse units. |

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| | infrastructure network cannot be practically and/or feasibly achieved within the site boundary, will the Council consider off-site alternatives in line with the biodiversity gain hierarchy.<br>3 Where off-site biodiversity gain is proposed, the Kent and Medway Local Nature Recovery Strategy, once published, should be used to guide the locations of BNG. In addition, the following locational hierarchy should be followed where possible:<br>(i) Within Dover District;<br>(ii) Within neighbouring local authority areas;<br>(iii) Within Kent and Medway;<br>(iv) Within the North Downs or North Kent Plain National Character Area;<br>(v) Elsewhere in England.<br>Only when it is demonstrated that there is no possibility of delivering BNG within the above locational hierarchy will the purchase of statutory credits be supported.<br>4 Development proposals must provide sufficient BNG information to satisfy the Council that the<br>BNG requirement is capable of being successfully discharged. This should include a draft Biodiversity Gain Plan and draft Habitat Management and Monitoring Plan that follow the DEFRA and Natural England templates which should also include the following local considerations: | Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this in accordance with part 3 of this policy. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies.<br><br>National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The proposed planting design (as outlined in **Application Document 7.5.7.2 oLEMP – Kent**, secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**) includes habitat creation, including balancing ponds around the Minster Converter Station and Substation, swales along the permanent access road and the creation of scrapes in various locations along the River Stour.<br><br>In addition, mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA has been identified and included within the Order Limits in order to secure its delivery, the location of this |

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| | (i) The method of BNG delivery (for example on or off site);<br>(ii) Evidence to demonstrate that the biodiversity gain hierarchy and locational hierarchy set out in criteria 3 of this Policy has been followed;<br>(iii) The Statutory Biodiversity Metric should have regard to the Interim Strategic Significance Guidance for BNG in Kent and Medway (as updated), until superseded by the Local Nature Recovery Strategy;<br>(iv) Where baseline habitat of high or very high distinctiveness is retained on-site, the draft Habitat Management and Monitoring Plan should include proposals to secure its management to ensure that no deterioration would occur that results in reduced overall BNG; (v) In deciding whether any on-site BNG is 'significant' regard shall be had to local guidance on its definition, to inform future management and monitoring requirements.<br>5 BNG proposals will be secured by condition and/or legal agreement with the Council or a conservation covenant with a responsible body. Where legal agreements are with the Council<br>this will include a requirement to cover the Council's costs associated with the long-term monitoring of the BNG delivery.<br>6 Proposals to create biodiversity sites in appropriate locations, including biodiversity enhancement sites and sites associated with delivering the key outcomes of the Dover Green | land in relation to the SPA is shown in the **General Arrangement Plans (Sheet Six)** for the Kent Onshore Scheme and also in the **Application Document 7.5.7.2 oLEMP – Kent** and **Application Document 7.5.7.2.4 Minster Converter and Substation Enhancement Areas**, as secured by **Application Document 7.5.3.2 CEMP Appendix B REAC**, as part of Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**. |

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| | Infrastructure Strategy, and the Local Nature Recovery Strategy when published, will be supported.<br>7 The Council will encourage BNG that helps deliver nature-based solutions to climate change as well as biodiversity loss, such as the restoration and creation of ecosystems to protect shorelines, protect communities from flooding, or increasing carbon sequestration. | |
| NE2 - Landscape Character and the Kent Downs AONB | Proposals should demonstrate particular regard to the Landscape Character Area, as defined by the Dover District Landscape Character Assessment 2020 and the Kent Downs AONB Landscape Character Assessment Review, in which they are located and in particular to the following landscape characteristics:<br>a Landform, topography, geology and natural patterns of drainage;<br>b The pattern and composition of trees and woodlands;<br>c The type and composition of wildlife habitats;<br>d The pattern and composition of field boundaries;<br>e The pattern and distribution of settlements, roads and footpaths;<br>f The presence and pattern of historic landscape features;<br>g The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features. | **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme. No element of the Kent Onshore Scheme is located within an AONB or will have an impact on an AONB and therefore the appraisal of national landscape impacts for the Kent Onshore Scheme is not required.<br><br>The landscape and visual impacts of the Proposed Project are assessed for the Kent Onshore Scheme in **Application Document 6.3.3.1.C Appendix 3.1.C Landscape Designation and Landscape Character Assessment** and **Application Document 6.3.3.1.D Visual Amenity Baseline and Assessment.**<br><br>Published landscape and seascape character documents have been used as a means of assessing landscape effects, as described in Section 2.7 Baseline Conditions of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Landscape and Visual.** |

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| | In addition, all proposals within the Kent Downs AONB, including the Heritage Coasts, must seek to further the purpose of conserving and enhancing the natural beauty of the Kent Downs AONB. All proposals within, or affecting the setting of, the AONB should be limited in scale and extent and will be supported where:<br>h Development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting;<br>i The location, form, scale, materials and design would conserve and where appropriate enhance or restore the special character of the landscape;<br>j The development would enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts; and<br>k The development has had regard to the AONB Management Plan and any associated guidance. Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest. | Relevant policies in local development documents that were taken into account in the assessment are set out in Section 2.2 Regulatory and Planning Context of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Landscape and Visual.**<br><br>Embedded mitigation measures have been applied to reduce, and where possible avoid, landscape and visual effects of the Proposed Project. Measures that have been incorporated include:<br>• Sensitive routing and siting of infrastructure and temporary works;<br>• The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in response to the Design Principles presented in **Application Document 7.12.2 Design Principles – Kent**; and<br>• an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and biodiversity mitigation as well as biodiversity net gain.<br><br>During construction, two out of the 11 landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These are both LCAs (E1 and A2) within which the Minster |

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| | | Converter Station, Minster Substation, and HVAC OHL works would be constructed.<br><br>During operation at year 1, one out of the 11 landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. This is LCA E1 within which the Minster Converter Station and Minster Substation would be permanently located.<br><br>During operation at year 15, none of the landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme.<br><br>During construction, five out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These comprise receptors from representative viewpoints 3, 4, 5, 6, and 11 which are all located in the local landscape around the Minster Converter Station and Minster Substation and also the HVAC OHL works.<br><br>During operation at year 1, four out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects. These are the same viewpoints as |

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| | | during construction, with the exception of viewpoint 3 which reduces to a minor effect.<br><br>During operation at year 15, two out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These comprises receptors from representative viewpoints 4 and 5 which are located in very close proximity to the north of Minster Converter Station and Minster Substation. The permanent infrastructure of the Kent Onshore Scheme would remain to be permanently visible in a proportion of the horizontal extent of view from nearby receptors, with the remainder of the panorama unaffected.<br><br>Landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible. However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Proposed Project), paragraph 4.2.15 of NPS EN-1, presumption in favour of consenting CNP Infrastructure therefore applies. |

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| NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy | Developments for other uses that would increase recreational activity causing disturbance to qualifying bird species, including but not limited to holiday accommodation, hotels and leisure uses, will be assessed on a case-by-case basis under the Habitat Regulations and may be required to make full or partial contributions towards the delivery of the SAMM Strategy if appropriate. | The Proposed Project, including the Kent Onshore Scheme would not increase recreational activity or be considered relevant to this policy. |
| NE4 - Air Quality | Development proposals that might lead to a significant deterioration in air quality or national air quality objectives being exceeded, either alone, or in combination with other committed development, will be required to submit an Air Quality Assessment, carried out having regard to the relevant guidance and utilising the DEFRA Emissions Factor Toolkit, to be agreed with the Local Planning Authority as part of planning applications. Such an Assessment should address:<br>a The cumulative effect of further emissions arising from the proposals; and,<br>b The proposed mitigation measures, including appropriate design and offsetting measures, which would prevent National Air Quality Objectives being exceeded or would reduce the extent of any air quality deterioration.<br><br>Major development proposals will be required to demonstrate a shift to the use of sustainable low emission transport, in accordance with Policy TI 1, in order to minimise the impact of vehicle emissions | **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** of the ES assesses the likely air quality effects that would result from the Kent Onshore Scheme and consider the existing baseline conditions and the likely changes and effects to air quality levels during the construction, operation and maintenance and decommissioning phases. The assessments confirm there would not be a deterioration in air quality or substantial changes in air quality levels and therefore not expected to have significant adverse effects upon air quality. The Kent Onshore Scheme would also not lead to a breach of any national air quality limits or statutory air quality objectives.<br>The Kent Onshore Scheme has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in **Application Document 7.5.3.2 Outline Onshore CEMP Appendix B REAC** and this includes |

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| | on air quality and how such a modal shift will be achieved.<br>Proposals which will result in National Air Quality Objectives being exceeded will not be permitted. | the provision of a construction dust management plan. Further control and management measures have also been proposed during the construction phase and are detailed in **Application Document 7.5.3.1 Outline Onshore CEMP Appendix A Outline Code of Construction Practice**. All relevant management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO**<br><br>Air quality management plans have been compiled and presented in **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent**. Both management plans set out measures to control and management air quality impacts during construction. As set out in the air quality management plans, construction vehicles will conform to relevant applicable standards and will be correctly maintained and operated in accordance with the manufacture's recommendations, so as to help reduce vehicle emissions. All relevant managements plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO** |
| NE5 - Water Supply and Quality | Within Ground Water Source Protection Zones, as shown on the Policies Map, development will only be permitted if it is demonstrated that there is no risk of contamination to groundwater sources given the reliance on groundwater for the water supply to this District. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented. The following will only be | The Proposed Project is not located within any Ground Water Source Protection Zones identified on the Policy map.<br><br>**Application Document 6.2.3.4 Part 3 Kent Chapter 5 Water Environment** presents the assessment of the likely significant water environment effects that could result from the Proposed Project. |

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| | permitted in Zones 1 and 2 if adequate safeguards against possible contamination are provided:<br>a Septic tanks, storage tanks containing hydrocarbons or any chemicals, or underground storage tanks;<br>b Proposals for development which may include activities which would pose a high risk of contamination;<br>c Proposals for the manufacture and use of organic chemicals, particularly chlorinated solvents;<br>d Oil pipelines;<br>e Storm water overflows;<br>f Activities which involve the disposal of liquid waste to land; and<br>g Sustainable urban Drainage Systems.<br>New graveyards or cemeteries will not be permitted in Zone 1. Farm waste, storage areas, new foul<br>or combined sewerage systems discharging to the ground will not be permitted in Zone 1 unless adequate safeguards are provided.<br>All development proposals must provide a connection to the sewerage system at the nearest point of adequate capacity wherever feasible, as advised by the service provider, and ensure future access to the existing sewerage systems for maintenance and upsizing purposes. For developments which are not on mains drainage, provision of a package treatment plant to be approved in principle by Environment Agency | The construction of the Kent Onshore Scheme is not expected to result in any likely significant effects in relation to water environment receptors, land drainage or flood risk during construction.<br>Once constructed, the Proposed Project would pose a low risk of contamination given the water treatment measures and other mitigation that will be in place. The temporary culverts would also be removed and watercourse channels will be reinstated. As result, no likely significant effects on water environment receptors, land drainage or flood risk are anticipated during operation.<br>Decommissioning activities such as temporary compounds, dismantling and demolition would be expected to take place in accordance with the relevant permits, good practice and mitigation measures. No likely significant effects associated with decommissioning of the Kent Onshore Scheme are therefore anticipated.<br>As outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**, the substations and converter stations would include permanent surface and foul drainage systems. Hard standing areas would be drained to the surface water drainage system, attenuated and treated through sustainable drainage systems (SuDS) and discharged to local watercourses or infiltrated where geology allows. There would be no permanent foul discharge required at the sites, but a |

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| | Guidance will be required. Schemes that would be likely to result in a reduction in the quality or quantity of groundwater resources will not be permitted.<br><br>The Council will support, in principle, infrastructure proposals designed to increase water supply and wastewater treatment capacity, subject to there being no significant adverse environmental impacts and the minimisation of those that may remain. | waste/foul water system would be used on the sites, comprising short pipes from the amenities buildings to separate cesspools that would be periodically emptied as required. Wastewater generated would be very limited given the substation sites would be unmanned and the converter stations would only have a small contingent of staff, wastewater would only come from use of facilities in the amenities buildings. The Proposed Project would not add burden to existing foul sewers and therefore, this source of flooding has been scoped out. |
| HE1 - Designated and Non-Designated Heritage Assets | Proposals which conserve or enhance the heritage assets of the District, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported. In particular, proposals that bring redundant or under-used buildings and areas, at risk through neglect, decay or other threats into appropriate and viable use consistent with their conservation, will be encouraged. This includes those on the Heritage at Risk Register held by Historic England, buildings and sites identified during the planning application process and any local list of heritage assets at risk.<br><br>Development will not be permitted where it will cause total loss of significance or substantial harm to a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary to provide substantial public benefits that will outweigh the harm or loss caused, or | **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** reports the assessment of the likely significant cultural heritage effects that could result from the Proposed Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Proposed Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets<br><br>Mitigation measures to reduce impacts on archaeology are set out in **Application Document 7.5.4.2 Kent Onshore oWSI (Draft)** and include preservation in situ, archaeological investigation and recording, and a |

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| | a Where the nature of the heritage asset prevents all reasonable or viable uses of the site, and no viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and<br>b Conservation through grant funding is not possible, and the harm to or loss of the asset is outweighed by the benefits of bringing the site back into use.<br>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposals, including, where appropriate, securing the optimum viable use of the heritage asset.<br>For development that involves the installation of energy-efficiency improvements to heritage assets,<br>applications should also demonstrate a whole building approach, including an assessment of the suitability of the proposed measures for the particular property, its construction and materials, in addition to the impact on its heritage significance.<br>All applications with potential to affect a heritage asset or its setting must be supported by a Heritage Statement, which should draw on the evidence contained in the Dover District Heritage Strategy, including referencing the heritage themes of the Strategy that apply. Such a Statement should include a description of the asset's historic, | protocol for dealing with unexpected archaeological discoveries during construction.<br>**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** identifies that with mitigation in place there would be no significant residual adverse effects to non-designated heritage assets. The Heritage Statement concludes that the Onshore Scheme would result in less than substantial harm to 8 non-designated heritage assets of negligible value.<br>The Heritage Statement concludes that the Proposed Project would not result in substantial harm to any designated assets. The Heritage Statement concludes the Kent Onshore Scheme would result in less than substantial harm to one non-designated heritage asset of schedulable quality.<br>The substantial public benefits and need for the Proposed Project, as set out in Section 5 of this Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality.<br>The Proposed Project is not located in a Conservation Area. |

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| | architectural or archaeological significance and the likely impact of the proposals on its significance, proportionate to the importance of the asset. | |
| HE2 - Conservation Areas | Applications for development or redevelopment in Conservations Areas will be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area. Applications should be guided by and make reference to the appropriate Conservation Area Character Appraisal where one is in operation.<br>All new development and alterations in Conservation Areas should:<br>a Respect the plan form, architectural features, materials, height, massing, building lines, roofscapes, scale, relationships between buildings and the spaces between them;<br>b Retain trees, open spaces, walls, fences and other features where they contribute positively to<br>the character and appearance of the Area;<br>c Be appropriate in land use to the character, appearance and historic function of the Area;<br>d Not generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area; and<br>e Not prejudice important views into or out of the Area. | |
| HE3 - Archaeology | The archaeological and historic integrity of Scheduled Monuments and other important | |

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| | archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such heritage assets will be assessed in line with Policy HE1.<br><br>Planning applications, on sites where there is, or is the potential for, an archaeological heritage asset, must include an appropriate desk-based assessment of the asset.<br>In addition, where the assessment reveals that important or potentially significant archaeological<br>heritage assets may exist, developers will be required to, where necessary, arrange for field evaluations to be carried out by an appropriately qualified contractor in advance of the determination of the planning application. Such an evaluation should define:<br>a The character, significance and condition of any archaeological deposits or structures within the application site; and<br>b The likely impact of the proposed development on the archaeology, its significance and setting (including the limits to the depth to which groundworks can go on the site); and<br>c The means of mitigating the effect of the proposed development including a statement setting out the impact of the development.<br>Where development proposals affect non-designated heritage assets with an archaeological | |

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| | interest, the District Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible clear justification will be required. Where the justification is accepted a programme of archaeological excavation and recording is likely to be required to be carried out. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the District Council.<br><br>The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository.<br><br>For applications in the Dover UAD area (as shown on the Policies Map) the Archaeology of Dover Town SPD should be consulted and applicable requirements in such detailed advice should be followed. | |

# Appendix Table C.7 Kent Minerals and Waste Local Plan 2024 to 2039 (Draft)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| Policy CSM 5 Land-won Mineral Safeguarding | Economic mineral resources are safeguarded from being unnecessarily sterilised by other development by the identification of:<br>• Mineral Safeguarding Areas for the areas of brickearth, sharp sand and gravel, soft sand (including silica sand), ragstone and building stone as defined on the Mineral Safeguarding Area Policies Maps in Chapter 9<br>• Mineral Consultation Areas which cover the same area as the Minerals Safeguarding Areas.<br>• Sites for mineral working within the plan period are identified in the Annual Monitoring Report and in the Mineral Sites Plan | The Order limits are not located within a Mineral Safeguarding Area, as set out within the Kent Minerals and Waste Local Plan. |
| Policy CSW 3 Waste Reduction | All new development must be designed in accordance with circular economy principles to:<br>1. Minimise the production of construction, demolition and excavation waste and manage any such waste arising during the development in accordance with Policy CSW 2;<br>2. retain and repurpose existing structures where possible;<br>3. allow for ease of redevelopment and refurbishment; and,<br>4. maximise sustainable construction methods which include the use of recycled and recyclable materials and techniques which minimise waste and | Site waste shall be managed in a structured and auditable manner in accordance with the agreed Site Waste Management Plan (SWMP), from the commencement of the Proposed Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. Further details on Construction Waste are found in **Application Document 6.2.1.4 Part 1** |

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| | allow for ease of deconstruction and reuse of building components<br>For major developments the above should be demonstrated via the submission of a Circular Economy Statement.<br>New development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed.<br>In particular proposals should ensure that:<br>1. there is adequate temporary storage space for waste generated by that development allowing for the separate storage of recyclable materials;<br>2. as necessary, there is adequate communal storage for waste, including separate recyclables, pending its collection; and<br>3. storage and collection systems (e.g. any dedicated spaces, storage areas and chutes or underground waste collection systems), for waste are of high quality design and are incorporated in a manner which will ensure there is adequate and convenient access for users and waste collection operatives and will contribute to the achievement of waste management targets; and<br>4. adequate contingency measures are in place to manage any systems failures. All relevant proposals should be accompanied by a recycling and waste management strategy which considers the above matters and demonstrates the ability to meet local authority waste management targets. | **Introduction Chapter 4 Description of the Proposed Project.**<br><br>During earthworks activities, material would be segregated following excavation to better enable its re-use. Topsoil would be removed first and stored separately to deeper sub-soil. This would enable the material to be re-used as topsoil during reinstatement.<br><br>Material excavated as part of the underground cable installation would be re-used as backfill within the trenches if deemed to have suitable thermal properties to comply with the proposed cable system design.<br><br>Excess sub-soil and top-soil would be used as part of the landscaping works where viable limiting the need to remove it from site. |

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| Policy DM 7 Safeguarding Mineral Resources | Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding where it is demonstrated that either:<br>1. the mineral is not of economic value or does not exist; or<br>2. that extraction of the mineral would not be viable or practicable; or<br>3. the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or<br>4. the incompatible development is of a temporary nature that can be completed, and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or<br>5. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or<br>6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built-up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non- | The Order limits are not located within a Mineral Safeguarding Area, as set out within the Kent Minerals and Waste Local Plan. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
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| | material amendments to current planning permissions; or<br>7. it constitutes development on a site allocated in the adopted development plan where consideration of the above factors (1-6) concluded that mineral resources will not be needlessly sterilised.<br>Further guidance on the application of this policy is included in a Supplementary Planning Document. | |
| Policy CSM 5 Land-won Mineral Safeguarding | Economic mineral resources are safeguarded from being unnecessarily sterilised by other development by the identification of:<br>• Mineral Safeguarding Areas for the areas of brickearth, sharp sand and gravel, soft sand (including silica sand), ragstone and building stone as defined on the Mineral Safeguarding Area Policies Maps in Chapter 9<br>• Mineral Consultation Areas which cover the same area as the Minerals Safeguarding Areas.<br>• Sites for mineral working within the plan period are identified in the Annual Monitoring Report and in the Mineral Sites Plan | |

# Appendix Table C.8 Ash Neighbourhood Development Plan 2018-2037 (Adopted September 2021)

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| Policy ANP1 – Development in the countryside | Development in the countryside beyond the Ash Village settlement boundary will only be supported where it provides for a local business or community need.<br><br>Development proposals must have regard to the purpose of conserving and improving the physical surroundings and the natural beauty by enhancing and expanding the trees and hedgerows, preferably native/indigenous, and landscape within the designated area.<br><br>Developments would maintain the distinctive views and visual connectivity of the village with the surrounding countryside from public vantage points within, and adjacent to, the built-up area, in particular those defined on Map 6 (Key views in and around the village of Ash).<br><br>Lighting should only be directed where necessary and there should be no loss of night-time dark skies due to light pollution. | **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** presents the assessment of the likely significant landscape and visual effects that could result from the Proposed Project, specifically the Kent Onshore Scheme.<br>Embedded mitigation measures have been applied to reduce, and where possible avoid, landscape and visual effects of the Proposed Project. Measures that have been incorporated include:<br>• Sensitive routing and siting of infrastructure and temporary works;<br>• The design of the Minster Converter Station and Minster Substation, in terms of the building form and the external materials, has been developed in response to the Design Principles presented in **Application Document 7.12.2 Design Principles – Kent**; and<br>• an outline landscape strategy has been prepared for the converter station and substation site which provides a collaborative approach to delivering landscape and biodiversity mitigation as well as biodiversity net gain. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | | During construction, two out of the 11 landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These are both LCAs (E1 and A2) within which the Minster Converter Station, Minster Substation, and HVAC OHL works would be constructed.<br><br>During operation at year 1, one out of the 11 landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. This is LCA E1 within which the Minster Converter Station and Minster Substation would be permanently located.<br><br>During operation at year 15, none of the landscape and seascape receptors within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme.<br><br>During construction, five out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These comprise receptors from representative viewpoints 3, 4, 5, 6, and 11 which are all located in the local landscape around the Minster Converter Station and Minster Substation and also the HVAC OHL works. |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | | During operation at year 1, four out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects. These are the same viewpoints as during construction, with the exception of viewpoint 3 which reduces to a minor effect.<br><br>During operation at year 15, two out of the 14 representative viewpoints within the landscape and visual Study Area would experience significant adverse effects arising from the Kent Onshore Scheme. These comprises receptors from representative viewpoints 4 and 5 which are located in very close proximity to the north of Minster Converter Station and Minster Substation. The permanent infrastructure of the Kent Onshore Scheme would remain to be permanently visible in a proportion of the horizontal extent of view from nearby receptors, with the remainder of the panorama unaffected.<br><br>Landscape proposals have responded to the design of the Proposed Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible.<br>The visual assessment presented in **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment** and summarised in this chapter, has assessed the likely significant effects on |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | | visual amenity from the construction, operation and maintenance of the Proposed Project. For the Kent Onshore Scheme, the associated lighting (controlled manually as required during periods of low light or darkness) is expected to be limited and is not anticipated to be apparent within the view due to distance and intervening vegetation. |
| P2 APN2 – Designated local green spaces | Development proposals that result in the loss of local green spaces or result in any harm to their character, setting, accessibility, appearance, or general quality or amenity value will not be supported | The Proposed Project has taken a precautionary approach to the identification of potential open space. There will be no material impact or loss to the function or use of the spaces identified in Kent, therefore, no further assessment was required. Whilst there might be some short-term disturbance during construction this will be temporary and where required, footpaths will be diverted or altered to compensate for any impact or disruption as a result of the Proposed Project. Overall, there will be no material permanent impact or loss of open space. |
| P4 Policy ANP4 – Biodiversity | Development should provide biodiversity net gains of no less than 10%.<br><br>New developments present an opportunity to maximise the benefits for biodiversity and should therefore seek to maximise these while ensuring there is no detriment to the Sandwich Bay and Thanet Coast SPA, SAC and Ramsar sites, the Pegwell Bay NNR and the Stodmarsh SSSI. | As per 4.6 of NPS EN-1 biodiversity net gain is not a legal obligation for NSIPs and therefore the Proposed Project is not required to achieve 10% BNG. As detailed in **Application Document 6.12 Biodiversity Net Gain Feasibility Report**, the Kent Onshore Scheme will result in a net loss for Area units for Hedgerow Units and for Watercourse units.<br><br>Although it has been identified in the **Application Document 6.12 Biodiversity Net Gain Feasibility Report** that the Proposed Project will not result in a net gain for all types of habitat units National Grid is |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | Development should seek to avoid any harm and minimise any adverse impacts upon the local biodiversity, habitats and wildlife. Where there is potential harm, mitigation strategies should be implemented to reduce any adverse effects.<br><br>Developments will only be supported when they provide an independent survey report that is supported by the local planning authority, which agrees a robust mitigation plan that identifies there are no alternatives, or that appropriate mitigation measures can be put in place. | committed to the delivery of 10% BNG for the Proposed Project as a whole and will work with third party landowners and relevant external organisations to deliver this. It is proposed that the BNG delivery will be secured via a suitable legal mechanism. Discussions in relation to the appropriate mechanism are currently being undertaken with the local planning authorities and other relevant conservation bodies. |
| P6 APN6 – Developments and Conservation | The Parish Council will support development that assist in delivering the aims of the Plan, in particular:<br><br>• Demonstrate a high standard of design in accordance with the Ash Character Assessment (2018).<br>• Building design should respect the village setting, taking account of the Ash Design Guide.<br>• All new developments should be designed to avoid increased vulnerability to the impacts of climate change. | Section 6.3 of the Planning Statement explains how good design has been embedded in the project from the outset.<br><br>Design principles have been developed through ongoing engagement with the host authorities. The design principles include project-level design principles covering both the Suffolk and Kent Onshore Schemes and site-specific design principles (specific to each converter station site in Suffolk and Kent). In addition, Critical Design Constraints have been identified which relate to the delivery programme, functional requirements and operational and maintenance requirements, amongst other things.<br><br>The site-specific design principles for the converter station sites in Kent provide guiding principles for the |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | | detailed design for these elements of the Proposed Project. As specified in Requirement 3 of Schedule 3 of the Draft DCO (**Application Document 3.1, draft DCO**), details of the layout, scale and external appearance of the Suffolk and Kent converter stations will be submitted to the relevant host LPAs for confirmation that they are in general accordance with the site-specific design principles.<br><br>Independent professional advice on the design of the proposed converter stations was also sought from Frame Projects, an independent design review body operating across England. Further information on the Design Review Panel (DRP) process undertaken is available in **Application Document 7.11.1 Design Approach Document – Suffolk** and **Application Document 7.11.2 Design Approach Document – Kent,** including the presentations to the DRP and an overview of the comments made by the DRP and how National Grid has addressed these comments**.** A design champion (Head of Offshore Engineering at National Grid) has also been appointed to provide oversight of the ongoing design process and delivery of the Proposed Project. The key responsibilities of the design champion are set out in **Application Document 7.11.1 Design Principles – Suffolk** and **Application Document 7.11.2 Design Principles – Kent.**<br><br>An explanation of how the design of the converter station site responds to its wider context is presented |

| Relevant Paragraph/Policy Reference | Policy requirement | Compliance with Policy |
|---|---|---|
| | | in **Application Document 7.11.2 Design Approach Document – Kent.** The Design Approach Document (DAD) illustrate potential design solutions for the above ground elements of the Suffolk and Kent Onshore Schemes and explain how the design approach has evolved in response to ongoing design development, feedback from statutory consultation, engagement with LPAs and the Design Review Panel. |

# Appendix D Heritage Statement

## D.1 Introduction

D.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East of England and East Anglia.

D.1.2 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent. A full description of the Proposed Project is presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**.

D.1.3 Legislation and national planning policy relevant to the determination of the DCO application identifies the need to present an assessment of harm to heritage assets affected by the Proposed Project, and to consider this in the decision as to whether to grant a DCO.

D.1.4 In compliance with relevant legislation and policy, this statement sets out the assessment of harm that the Proposed Project may have on terrestrial designated heritage assets, and on non-designated terrestrial heritage assets where the EIA has identified a level of impact that might result in harm. This statement is then used in the planning balance relating to the cultural heritage national planning policy tests set out in Section 9 of this Planning Statement.

D.1.5 This Heritage Statement includes the following:

- A summary of relevant legislation and guidance.
- The assessment methodology and the identification of heritage assets where there is potential for harm to occur.
- An assessment of the heritage significance of relevant heritage assets.
- A harm assessment for relevant heritage assets.
- A conclusion as to whether the level of harm amounts to substantial harm.

D.1.6 The assessments relating to cultural heritage matters carried out as part of the EIA are presented in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage** for the Suffolk Onshore Scheme, and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** for the Kent Onshore Scheme.

D.1.7 The national policy statements relevant to the harm assessment are presented in Section 7.6 of the Planning Statement and are not duplicated in their entirety here, but policy relevant to this harm assessment's methodology are referenced in Section D.3.

D.1.8 A summary of legislation and guidance relevant to the harm assessment is presented in Section D.2 below.

# D.2 Legislation and Guidance

### The Infrastructure Planning (Decisions) Regulations 2010 (H. M. Government, 2010)

D.2.1 The Infrastructure Planning (Decisions) Regulations 2010 apply to the determination of DCO applications under the Planning Act 2008. Regulation 3 requires the Secretary of State to have regard to the following when deciding an application:

- For an application which affects a listed building or its setting, the Secretary of State "must have regard to the desirability of preserving the listed building or its setting, or any features of special architectural or historic interest which it possesses".
- For an application relating to a conservation area, the Secretary of State "must have regard to the desirability of preserving or enhancing the character or appearance of that area".

### Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983 and 2002) (Hm Government , 1979)

D.2.2 The Act affords protection to heritage assets on the schedule of nationally important archaeological sites.

### The Planning (Listed Buildings and Conservation Areas) Act 1990 (H.M Government, 1990)

D.2.3 The Act (excluding normal planning procedures, which are disapplied by the DCO, which if granted, would encompass all of the normal consents) requires the Secretary of State to hold a list of buildings of special architectural or historical interest, which are accorded statutory protection. In addition, it expects local planning authorities to designate areas considered to be "*areas of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance and design*".

### Planning Practice Guidance (Ministry of Housing, Communities and Local Government, 2016)

**D.2.4** Planning Practice Guidance (PPG) (Ministry of Housing, Communities and Local Government, 2016) provides further narrative on the interpretation of harm and while the additional guidance relates to policy in the NPPF, it is relevant to the policies contained within NPS EN-1 (DESNZ, 2024) which, for the purpose of this DCO, are the primary policy considerations for NSIPs (Department of Levelling Up, Housing and Communities, 2024).

D.2.5 The PPG (Ministry of Housing, Communities and Local Government, 2016) expands on terms such as "*significance*" and its importance in decision making. Paragraph 018 states "*What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the NPPF apply. Within each*

*category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated*".

D.2.6 Paragraph 018 emphasises that substantial harm is a high test, and it is important to consider whether an adverse impact "*seriously affects a key element*" of an asset's significance. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.

D.2.7 Paragraph 013 states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Any degree of harm should be considered alongside any public benefits that can be delivered by development, and these benefits should flow from the Proposed Project and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020).

### Managing Significance in Decision-Taking 2015 (Historic England, 2015)

**D.2.8** Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2 (Historic England, 2015), comprises a planning advice note on implementing historic environment policy contained within the PPG (Ministry of Housing, Communities and Local Government, 2016). Paragraph 4 of the advice note emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the "*first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance*".

D.2.9 Paragraph 17 states that where a heritage asset has archaeological interest, the potential knowledge which may be unlocked by investigation may occasionally be harmed by even minor disturbance, thus damaging the significance of the asset. This can make some assets, or parts of them, very sensitive to change, and expert advice will be needed to identify these sensitivities.

D.2.10 With regard to harm, the document clarifies that change to heritage assets is inevitable, but that the change is only harmful when significance is damaged and that the "*nature and importance of the significance that is affected will dictate the proportionate response to assessing that change*" (paragraph 29). Paragraph 27 of the advice note reiterates that *"substantial harm is a high test which may not arise in many cases*".

## D.3 Assessment Methodology

**D.3.1** Designated and non-designated heritage assets which have been identified in the EIA as experiencing a medium or large level of impact, as defined by the assessment criteria in Section 3.4 of the Cultural Heritage ES Chapters for the Proposed Project, **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**, are considered in this harm statement. These criteria establish that medium or large impacts have the potential to result in significant or total loss of heritage significance.

D.3.2 The inclusion of archaeological remains at Ebbsfleet Peninsula Complex, which is a non-designated heritage asset of national importance, complies with paragraphs 5.9.5 and 5.9.6 of NPS EN-1 (DESNZ, 2024) which recognises that non-designated heritage assets that are "*demonstrated to be of equivalent significance to designated heritage*

*assets of the highest significance*" are required to be considered subject to the policies for those that are designated. Other non-designated assets that are not of national importance but where a medium or large impact is reported in the ES have also been included in the harm statement. Their inclusion recognises paragraph 5.9.33 of the NPS (DESNZ, 2024) which states that where an application may directly or indirectly affect non-designated heritage assets, "*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*, and as such, a proportionate level of assessment is provided in this harm statement to allow this judgement to be made.

D.3.3 As stated in Section 3.4 of the Cultural Heritage ES Chapters for the Proposed Project, **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**, there is no direct correlation between the significance of effect as reported in the ES and the level of harm caused to heritage significance. 'Effect' is a purely EIA term which balances the magnitude of predicted impact with a heritage 'value' score. Harm to heritage significance more readily correlates with the magnitude of impact reported in the ES chapters rather than the effect and, in line with the NPS and heritage guidance, this harm statement therefore places the emphasis on the level of impact to a heritage asset.

D.3.4 A medium or large magnitude of impact on a heritage asset would, more often, be the basis by which a decision maker would determine that the level of harm to the heritage significance of the asset may be substantial. A low magnitude of impact is unlikely to meet the test of substantial harm and would, more often, be the basis by which a decision maker would determine that the level of harm to the heritage significance of the asset would be less than substantial. A very low magnitude of impact is also likely to amount to less than substantial harm. Ultimately, and in line with relevant policy and heritage guidance, professional judgement is used to assess the degree of harm to the significance of a heritage asset.

D.3.5 Heritage assets that have been identified in the ESs as experiencing a medium or large impact from the Proposed Project are as follows:

**Suffolk Onshore Scheme**

- Wood Farmhouse, Grade II Listed Building (NHLE1231179)
- Hurts Hall Grade II Listed Building and associated non-designated parkland (NHLE1268178; SXM017; SXM077).
- Gorse Hill non-designated multi-period complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065).
- Possible non-designated enclosure, north-east of Hill Farm (SNF038).
- Saxmundham Converter Station, non-designated archaeological remains (SXM085; SNF033; SNF039).
- Saxmundham Converter Station South, non-designated Ring Ditch (SNF034).

**Kent Onshore Scheme**

- Ebbsfleet Peninsula Complex, non-designated multi-period settlement archaeology.
- Non-designated historical landscape features (AECOMK002) and (AECOMK006).
- Non-designated former Pillbox (TR 36 SE 465).

- Non-designated circular feature (AECOMK007).

D.3.6 Further designated assets are identified in the Suffolk Onshore Scheme ES as experiencing low and very low levels of impact. The assessment of those assets is no repeated here. The level of harm to those assets is assessed to be less than substantial, and at the lower end of that scale

## D.4 Statement of Significance

### Wood Farmhouse Grade II listed building (NHLE 1231179)

**D.4.1** Wood Farmhouse Grade II listed building has origins in the 17th century with 19th and 20th century additions and alterations. The original house is timber-framed with a later brick wing to the south. The exterior walls have been covered with a cement render which masks any architectural detailing that may be present and detracts from its overall aesthetic.

D.4.2 The farmhouse's heritage significance derives from its historical interest as a feature of the historic landscape that is indicative of the area's agricultural heritage and, recognising the level of alteration and cement render, its limited architectural interest as an example of a rural building built in a local style, using local materials. The functional setting of the farmhouse, which contributes to its experience and to the understanding of its historical interest, is provided by the large industrial farm buildings to the north of the farmhouse, and by the fields that encircle the farm.

D.4.3 It is recognised that while the farmhouse remains a Grade II listed structure on the National Heritage List for England, Listed Building Consent (DC/23/3457/LBC) has been granted by East Suffolk Council to demolish the structure following significant fire damage in April 2023. A fire assessment and proposed demolition report identified the building components that should be demolished, which include the original timber walls to the north and south elevations, and brick gable and chimney to the west. The report noted that all of the roof and majority of internal timbers had been lost to the fire.

### Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)

**D.4.4** Grade II listed Hurts Hall was built in the late-19th century after the previous hall (by Samuel Wyatt) was destroyed by fire. It is a country house built in Jacobethan style with Neoclassical influences. The hall is set within formal gardens, which were re-established as part of a 21st century restoration, and a wider parkland.

D.4.5 The hall's heritage significance derives from its architectural interests, but also from its historical interest as an important building in the history and development of Saxmundham town. The principal façade of the hall is north-facing, with views to the north across parkland and towards Saxmundham, which emphasises this association. The non-designated parkland is much denuded through the loss of footpaths and trees to agricultural land, which has affected the integrity of its original design. However, despite the erosion of its design, the parkland provides a sympathetic and pleasing backdrop to the hall and contributes positively to its experience.

D.4.6 Formal designed gardens to the west and south of the house comprise the hall's domestic setting and contribute to its aesthetic experience and appreciation. Beyond the hall and gardens, fields to the west, south and east of the house are appreciable in views from the formal gardens. The visual connection between the fields and the house

articulates the historical relationship between the house and the lands within its influence and further contributes to its historical interest.

### Gorse Hill multi-period complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065)

D.4.7 Gorse Hill comprises a large multi-period, non-designated, archaeological site containing remains dating from the Neolithic, Iron Age, Roman, medieval, post-medieval, and modern periods. The heritage significance of the buried archaeological remains derives from the historical and archaeological interest of their evidential value, and the information this buried evidence may contribute to regional research relating to settlement, industrial processes, and land-management.

### Possible non-designated enclosure, north-east of Hill Farm (SNF038)

D.4.8 The buried archaeological remains comprise a Romano-British enclosure, associated with a possible oven and cultivation ditches. The heritage significance of the buried remains derives from their archaeological and historic interest relating to the information they may contain relating to the history and development of settlement and land use during the Romano-British period. The enclosure's association with known archaeological remains, beyond the Order Limits but in the wider area, suggest they contribute to a landscape of Romano-British activity which could further regional research associated with settlement and land-management.

### Saxmundham Converter Station (SXM085; SNF033; SNF039)

**D.4.9** Archaeological remains identified at the site of the proposed Saxmundham Converter Station (SXM085; SNF033; SNF039) comprise an extensive complex of medieval enclosures, trackways, and possible structures, as well as two cremations dating to the Bronze Age.

D.4.10 The heritage significance of the buried medieval remains derives from their potential historical and archaeological interest, and potential artefactual and environmental evidence the remains may provide relating to the history and development of settlement and land use during the medieval period. The heritage significance of the Bronze Age remains derives from their archaeological interest and the contribution their archaeological evidence could make to regional research and understanding of early prehistoric funerary and ritual practices.

### Saxmundham Converter Station South, Ring Ditch (SNF034)

D.4.11 A possible Bronze Age ring ditch (SNF034) associated with a funerary barrow has been identified at the site of the proposed Saxmundham Converter Station. The heritage significance of the ring ditch derives from its archaeological interest and the potential for its archaeological evidence to contribute to regional research about Bronze Age funerary practices.

### Ebbsfleet Peninsula Complex, multi-period settlement archaeology

D.4.12 The Ebbsfleet Peninsula Complex comprises buried, non-designated archaeological remains dating from the Neolithic to the post-medieval period, with the densest area of remains comprising settlement and funerary activity from the Bronze Age, Iron Age, Late Iron Age and Romano-British periods. The density of the remains, the level of archaeological preservation, and the collective evidential value of multi-period and multi-

phase settlement archaeology is relatively rare, and the complex as an entity of archaeological evidence is assessed as being of potential national importance.

### Non-designated historical landscape features (AECOMK002) and (AECOMK006)

D.4.13 The sites of two agricultural features/ sheep dips (AECOMK002) and (AECOMK006) identified from historical maps are located within the Order Limits. **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** states that fieldwork surveys, comprising geophysical survey and trial trenching, confirm that the features were no longer present and had likely been removed by later ploughing. The features survive on historical map evidence only and have limited, negligible, local historical interest as landscape features. The features have no surviving archaeological interest

D.4.14 **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** adopts a worst-case scenario that basal deposits associated with the features may survive and that construction of the Kent Onshore Scheme may permanently remove all trace of surviving deposits and therefore the impact was assessed to be large, resulting in a minor effect. However, evidence provided by trial trenching would suggest that any limited historical and archaeological interest the features may have provided is no longer present and, as such, the features have no heritage significance and are not taken forward to the harm assessment in Section A.5.

### Former Pillbox (TR 36 SE 465) (large impact at Construction).

D.4.15 The site of a former Second World War pillbox line, shown on1940s aerial photography, is recorded in the Order Limits. The heritage significance of the asset, which is non-designated, derives from its local historical interest for the contribution it made to a range of defences employed across Kent during the Second World War, and limited archaeological interest, if foundations survive, deriving from the mode of its construction and surviving fabric. Although above-ground remains of the pillbox do not survive, **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** adopts a worst-case scenario that foundation remains may survive and that construction of the Kent Onshore Scheme may therefore result in the total loss of foundation remains. Foundation remains would be of negligible archaeological interest and it is assessed they would therefore be of negligible heritage significance. As such, this asset is not taken forward to the harm assessment in Section A.5.

### Circular Feature (AECOMK007) (large impact at Construction).

**D.4.16** The site of a circular feature shown on1940s aerial photography, is recorded in the Order Limits. The form of the feature, which is non-designated, suggests that it may be a prehistoric roundhouse. However, based on its spatial associations with other features, it is likely to represent a circular defensive enclosure/ bunker, associated with the site of an adjacent pill box. The heritage significance of this type of asset derives from its local historical interest for the contribution it made to a range of defensive features employed across Kent during the Second World War.

D.4.17 **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage** adopts a worst-case scenario that foundation remains associated with the possible bunker site may survive and that construction of the Kent Onshore Scheme may therefore result in the total loss of any remains present. However, evidence provided by fieldwork surveys would suggest that any archaeological interest is no longer present and, as such, the feature has no heritage significance and is not taken forward to the harm assessment in Section A.5.

## D.5 Harm Assessment

### Wood Farmhouse Grade II listed building (NHLE 1231179)

D.5.1 The presence of Saxmundham Converter Station during the operational stage of the Suffolk Onshore Scheme would constitute new built form into the functional setting of Wood Farmhouse. The presence of the converter station, while incongruous with the prevailing agricultural character, would not affect the ability to appreciate the farmhouse's functional setting and associative relationship with the agricultural landscape. The change to the functional setting of the farmhouse would not affect the farmhouse's architectural and historical interests and would not result in its heritage significance being altered or lost. The harm is therefore assessed to be less than substantial.

### Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)

D.5.2 The presence of Saxmundham Converter Station during the operational stage of the Suffolk Onshore Scheme would introduce a new built form into the wider setting of the hall that would be incongruous with the current agricultural character. The converter station would not change the hall's domestic setting, which is characterised by its formal gardens, the presence of which contribute to the aesthetic experience and appreciation of the hall. Furthermore, the presence of Saxmundham Converter Station, which may be visible in views south from the hall and from its gardens, would not affect the hall's architectural or historical interests, including its historical association with the development of Saxmundham, and the associative relationship between the house and the lands that, historically, were within its influence. As such, the heritage significance of the hall would not be lost or substantially altered, and the level of harm is assessed to be less than substantial.

### Gorse Hill multi-period complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065)

D.5.3 Gorse Hill comprises a large multi-period, non-designated, archaeological site comprising Neolithic, Iron Age, Roman, medieval, post-medieval, and modern archaeological remains. The heritage significance of the buried archaeological remains derives from the historical and archaeological interest of their potential evidential value which could contribute to regional research.

D.5.4 The archaeological remains are non-designated and are not considered to be of equivalent significance to a scheduled monument. The Suffolk Onshore Scheme would result in the permanent loss of a proportion of these remains, resulting in the loss of archaeological interest. However, the loss would be to archaeological features on the periphery of the area where the most sensitive and significant archaeological remains are concentrated. As such, the Suffolk Onshore Scheme would result in the loss of archaeological interest and heritage significance of a small part of the complex, but would not affect the most sensitive areas and would not result in total loss of, or substantial change to, the asset's heritage significance. The level of harm to the asset as a whole is therefore assessed to be less than substantial.

D.5.5 Further to this, a programme of archaeological investigation and recording will be carried out to mitigate effects to buried archaeological remains impacted by the Suffolk Onshore Scheme. The mitigation, set out in and secured in the DCO by **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation**

will investigate, record and publish findings of the archaeological remains present, thereby preserving the archaeological interest by record.

### Possible non-designated enclosure, north-east of Hill Farm (SNF038)

D.5.6 The non-designated Romano-British enclosure derives its heritage significance from its archaeological and historic interest, and from the contribution the remains could make to regional research on the development of settlement and land use in the Romano-British landscape.

D.5.7 The archaeological remains are non-designated and are not considered to be of equivalent significance to a scheduled monument. The Suffolk Onshore Scheme would result in the permanent loss of a large proportion of these remains, resulting in the loss of their archaeological interest. However, as the entire feature would not be lost, this would not amount to substantial harm.

D.5.8 Recognising the loss of archaeological interest, a programme of archaeological investigation and recording will be carried out to mitigate effects to buried archaeological remains impacted by the Suffolk Onshore Scheme. The mitigation, set out in and secured in the DCO by **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation**, will investigate, record and publish findings of archaeological remains present, thereby preserving the archaeological interest by record.

### Saxmundham Converter Station (SXM085; SNF033; SNF039)

**D.5.9** The non-designated archaeological remains identified at the site of the proposed Saxmundham Converter Station (SXM085; SNF033; SNF039) comprise an extensive complex of medieval enclosures, trackways, and possible structures, as well as two cremations dating to the Bronze Age. The densest, most complex archaeology, and therefore the area of greatest heritage significance has been avoided by the Suffolk Onshore Scheme design, and is located outside of the Order Limits. Construction of the Suffolk Onshore Scheme has the potential to result in the partial loss of medieval enclosures and part of a field system of lesser archaeological interest that are on the periphery of the complex.

D.5.10 The archaeological remains are non-designated and are not considered to be of equivalent significance to a scheduled monument. The Suffolk Onshore Scheme would therefore result in the loss of archaeological interest and heritage significance of a small part of the complex, but it would not affect the most sensitive parts of the complex that hold the features with the greatest levels of archaeological interest and heritage significance. As such, the level of harm to the asset's archaeological interest and heritage significance would be less than substantial.

D.5.11 Further to this, a programme of archaeological investigation and recording will be carried out to mitigate effects to buried archaeological remains impacted by the Suffolk Onshore Scheme. The mitigation, set out in and secured in the DCO by **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation** will investigate, record and publish findings of the archaeological remains present, thereby preserving the archaeological interest by record.

### Saxmundham Converter Station South, Ring Ditch (SNF034)

**D.5.12** A possible Bronze Age ring ditch (SNF034) associated with a funerary barrow has been identified at the site of the proposed Saxmundham Converter Station. The heritage

significance of the ring ditch derives from its archaeological interest and the evidence it has the potential to contribute to regional research and understanding of Bronze Age funerary practices.

D.5.13 The ring ditch is non-designated and is not considered to be of equivalent significance to a scheduled monument. The Suffolk Onshore Scheme has the potential to result in the total loss of the asset and therefore loss of its archaeological interest and heritage significance. As a non-designated asset that is not of equivalent significance to a scheduled monument the NPS EN-1 policy tests relating to substantial versus less than substantial harm do not apply to this asset and the test applied is Paragraph 5.9.33 of the NPS EN-1 (DESNZ, 2023).

D.5.14 The loss of the non-designated ring ditch will be mitigated by a programme of archaeological investigation and recording. The mitigation, set out and secured in the DCO by **Application Document 7.5.4.1 Suffolk Onshore Overarching Written Scheme of Investigation** will investigate, record and publish findings of the archaeological remains present, thereby preserving the ring ditch's archaeological interest and heritage significance by record.

### Ebbsfleet Peninsula Complex, multi-period settlement archaeology

**D.5.15** The Ebbsfleet Peninsula Complex comprises buried, non-designated, multi-period and multi-phase settlement archaeology of potential national importance and which is considered to be of equivalent significance to a scheduled monument.

D.5.16 The Kent Onshore Scheme has been designed to avoid physical impacts to the most sensitive areas of archaeological remains, and therefore the areas of greatest heritage significance. Some components of the Kent Onshore Scheme would permanently impact buried remains that are present on the fringes of the complex, resulting in the permanent loss of archaeological interest to a proportion of the asset as a whole. However, as the asset's heritage significance derives from the archaeological interest of the collective remains, the loss of a part of this interest would not amount to total loss or substantial harm, albeit to features of lower interest. As such, the level of harm to the asset's archaeological interest and heritage significance is less than substantial.

## D.6 Conclusion

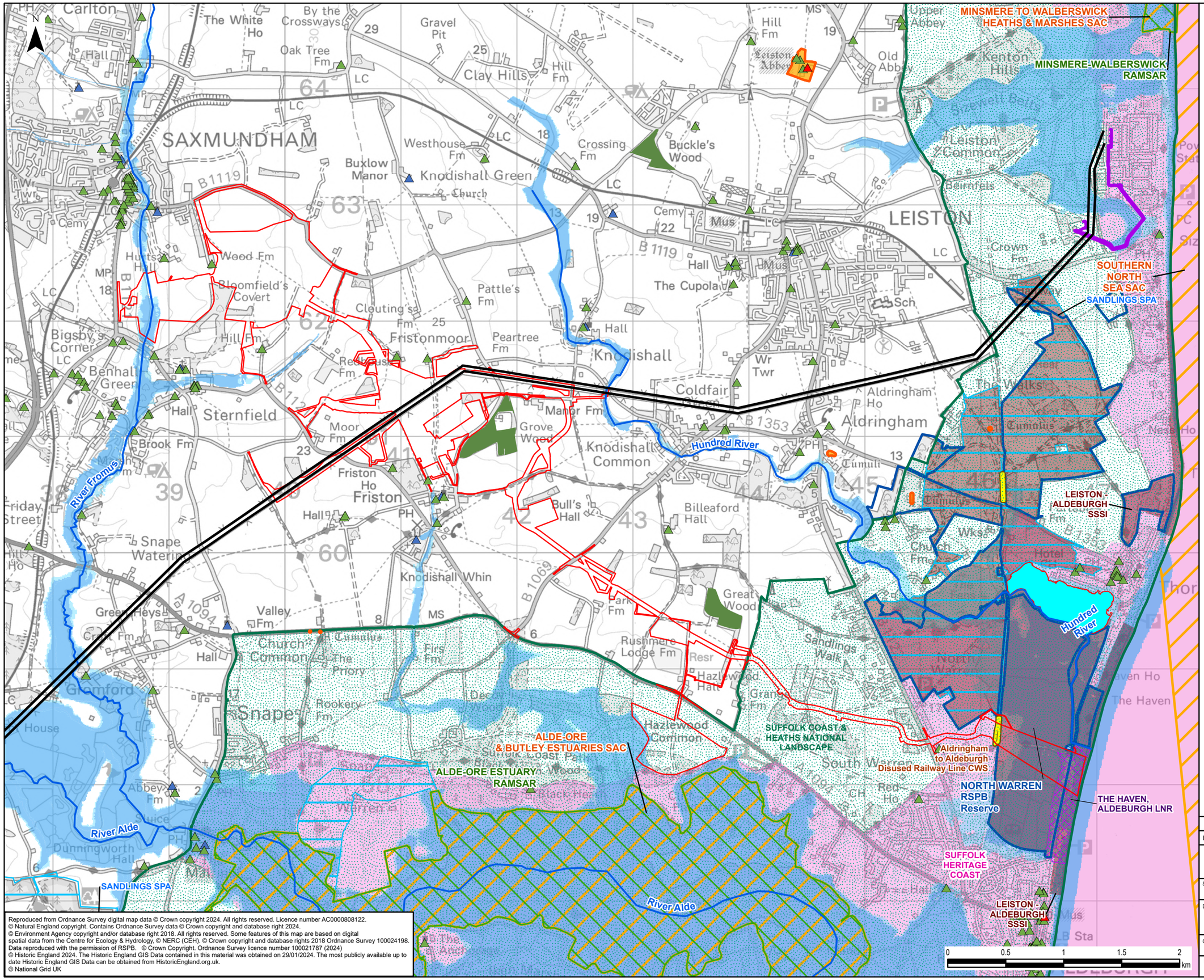
**D.6.1** NPS EN-1 (DESNZ, 2024) and the NPPF (Department of Levelling Up, Housing and Communities, 2024) require an assessment of harm to the significance of heritage assets affected by a proposed scheme. Both NPS EN-1 (DESNZ, 2024) and NPPF (Department of Levelling Up, Housing and Communities, 2024) categorise the level of harm into 'substantial' and 'less than substantial'.

D.6.2 PPG (Ministry of Housing, Communities and Local Government, 2016), which supports the NPPF (Department of Levelling Up, Housing and Communities, 2024), and the NPS where its policies supersede NPPF (Department of Levelling Up, Housing and Communities, 2024), requires the level of harm to designated heritage assets to be categorized as either less than substantial harm, or substantial harm, which includes total loss.

D.6.3 Paragraph 5.9.33 of the NPS EN-1 (DESNZ, 2024) states that where an application may directly or indirectly affect non-designated heritage assets, "*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*", and, as such, a proportionate level of assessment has been undertaken for non-designated heritage assets to allow this judgement to be made.

D.6.4 The ES Chapters for the **Proposed Project, 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** identify a number of impacts to designated and non-designated heritage assets that have the potential to result in harm to their heritage significance. This harm statement has assessed the impacts to the heritage interests of the assets and has concluded that neither the Suffolk Onshore Scheme nor the Kent Onshore Scheme would result in substantial harm to their heritage significance.

# Appendix E Figures




Legend

- Suffolk Onshore Scheme Boundary
- River
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- Ramsar
- Local Nature Reserve (LNR)
- County Wildlife Site (CWS)
- Ancient Woodland
- National Landscape
- RSPB Reserve
- Flood Zone 2
- Flood Zone 3
- Listed Building - Grade I
- Listed Building - Grade II
- Listed Building - Grade II*
- Registered Parks and Gardens - Grade II
- Scheduled Monuments
- Heritage Coast
- National Grid Overhead Line
- National Grid Cable

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MINSMERE-WALBERSWICK RAMSAR
MINSMERE-WALBERSWICK HEATHS AND MARSHES SSSI
MINSMERE-WALBERSWICK SPA
LEISTON - ALDEBURGH SSSI
ALDE-ORE ESTUARY SPA
ALDE-ORE ESTUARY SSSI
ALDE-ORE ESTUARY RAMSAR
OUTER THAMES ESTUARY SPA
THANET COAST & SANDWICH BAY SPA
THANET COAST MCZ
SANDWICH BAY SAC
THANET COAST & SANDWICH BAY RAMSAR
SANDWICH BAY TO HACKLINGE MARSHES SSSI
SANDWICH & PEGWELL BAY NNR
GOODWIN SANDS MCZ
SOUTHERN NORTH SEA SAC

English Channel

64
56
52
69

Edmunds
Stowmarket
Needham Market
Ipswich
Woodbridge
Shingle Street
Bawdsey
Felixstowe
Harwich
Manningtree
River Stour
River Deben
Glemsford
Long Melford
Sudbury
Halstead
River Colne
Colchester
Frinton-on-Sea
Clacton-on-Sea
Witham
Tollesbury
Maldon
Southminster
Burnham-on-Crouch
Southend-on-Sea
Sheerness
Margate
Birchington
Herne Bay
Whitstable
Ramsgate
Sittingbourne
Faversham
Canterbury

0 10 20 30 40 km

Legend

- Offshore Scheme Boundary
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- Ramsar
- National Nature Reserve (LNR)
- Marine Conservation Zone (MCZ)

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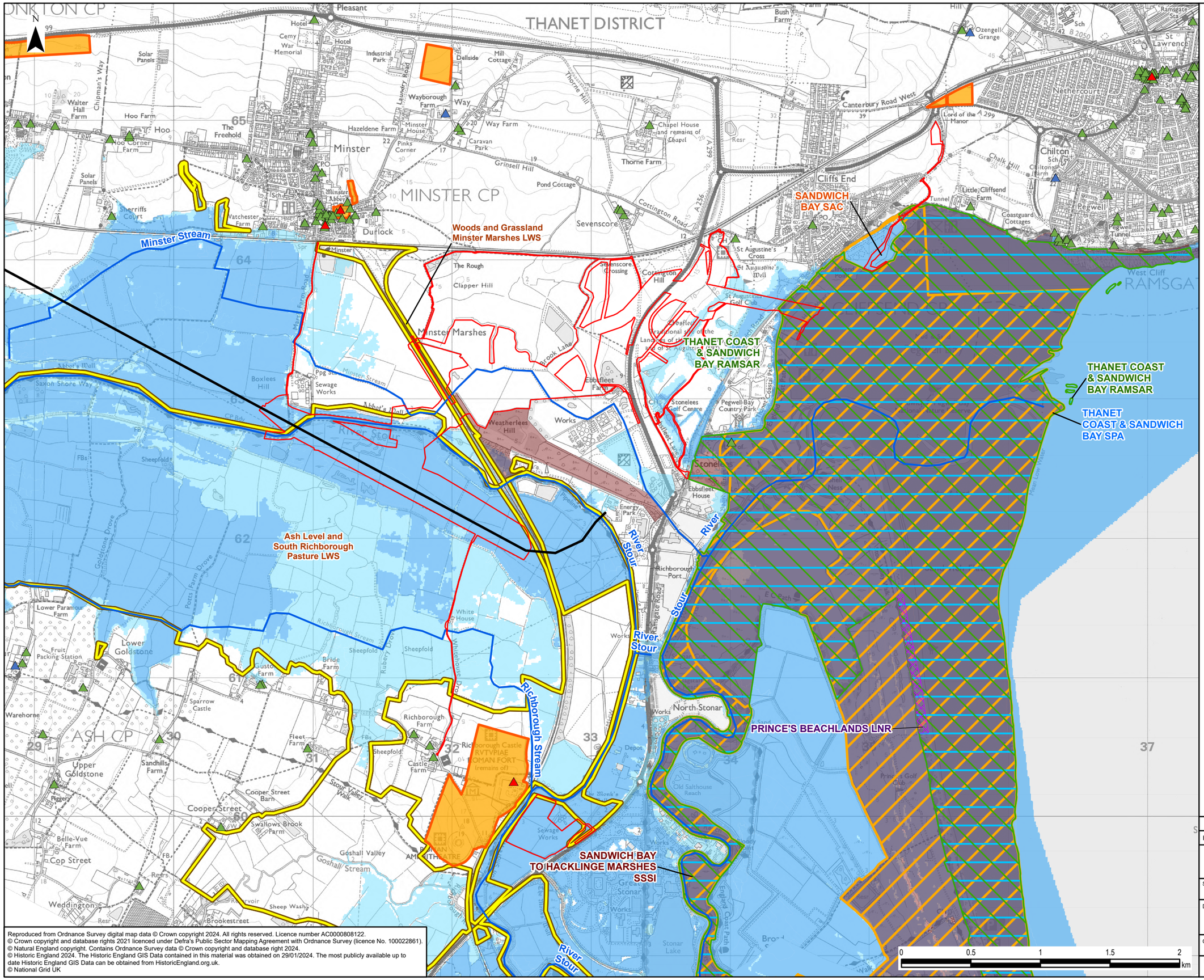
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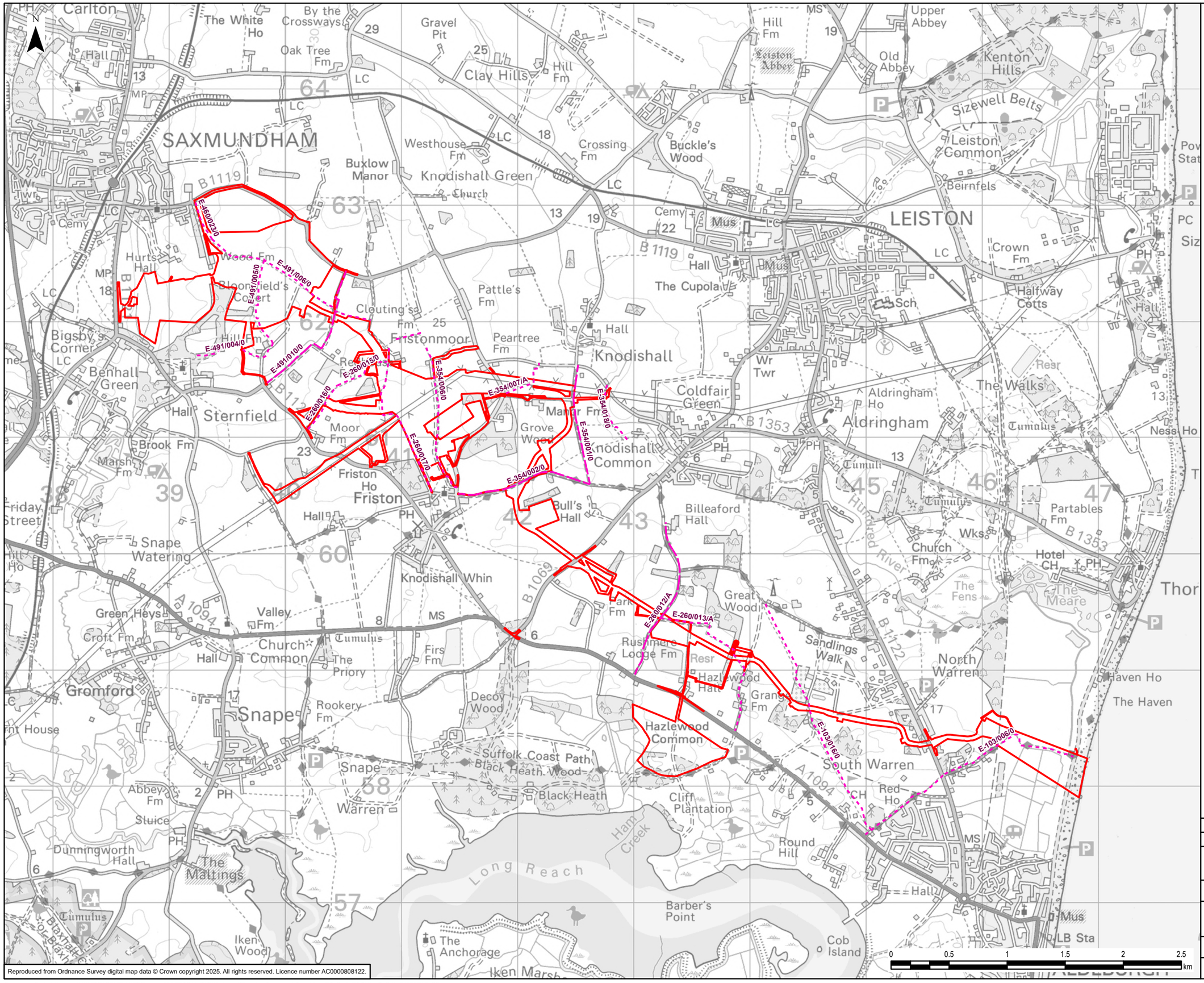
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Legend

- Suffolk Onshore Scheme Boundary
- Public Rights of Way
  - Footpath
  - Bridleway

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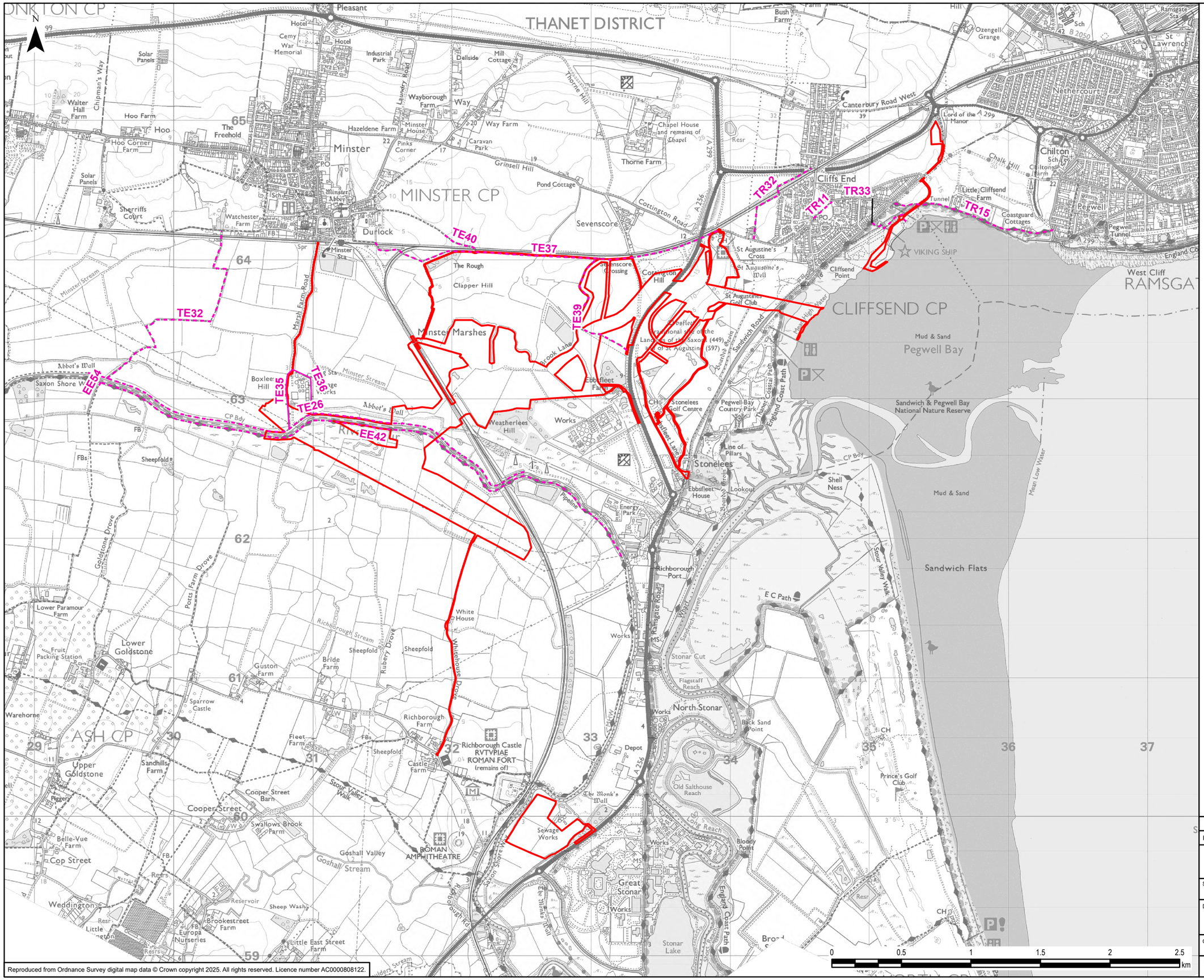
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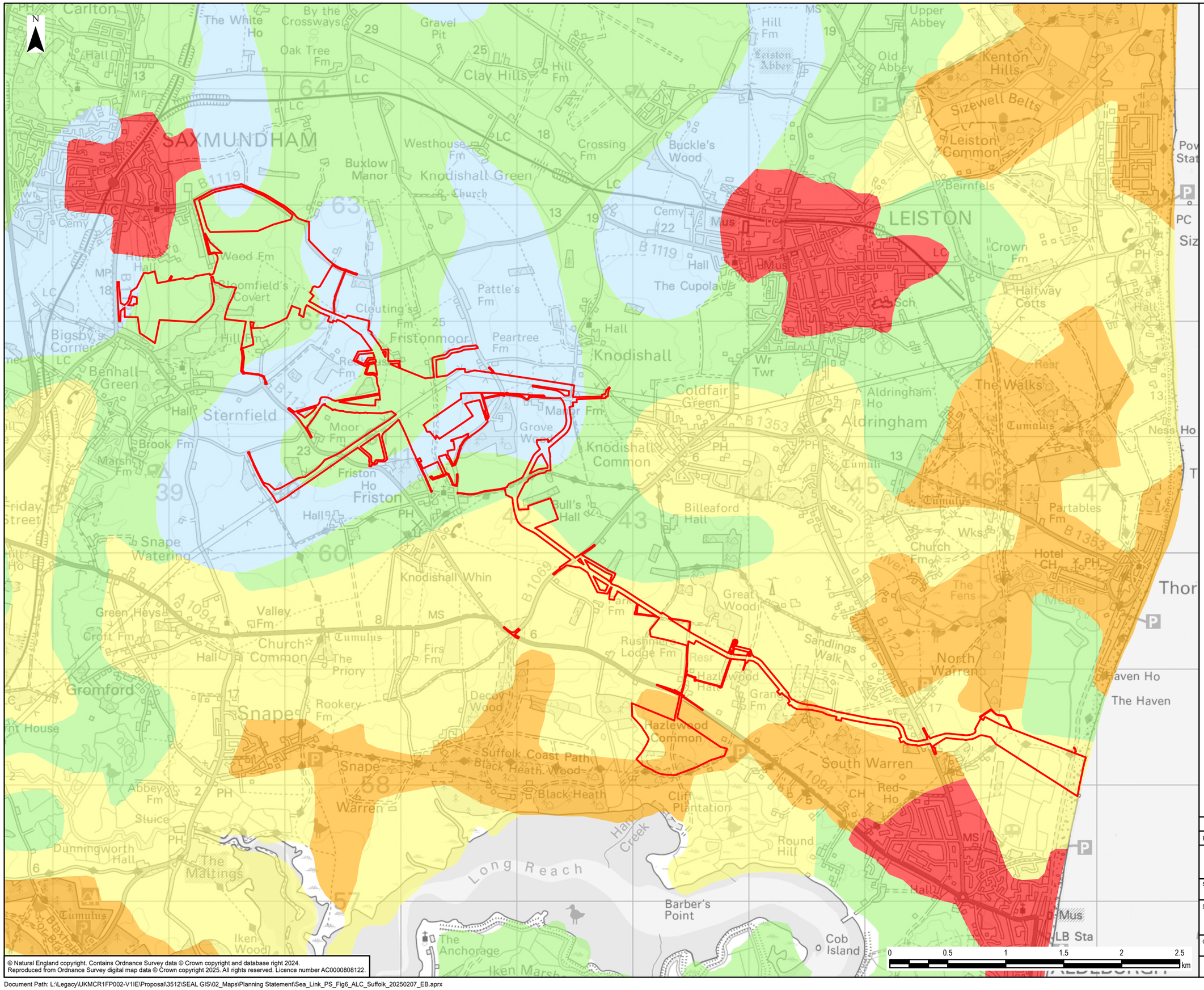
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Legend

- Suffolk Onshore Scheme Boundary

Agricultural Land Classification

- Grade 2
- Grade 3
- Grade 4
- Non Agricultural
- Urban

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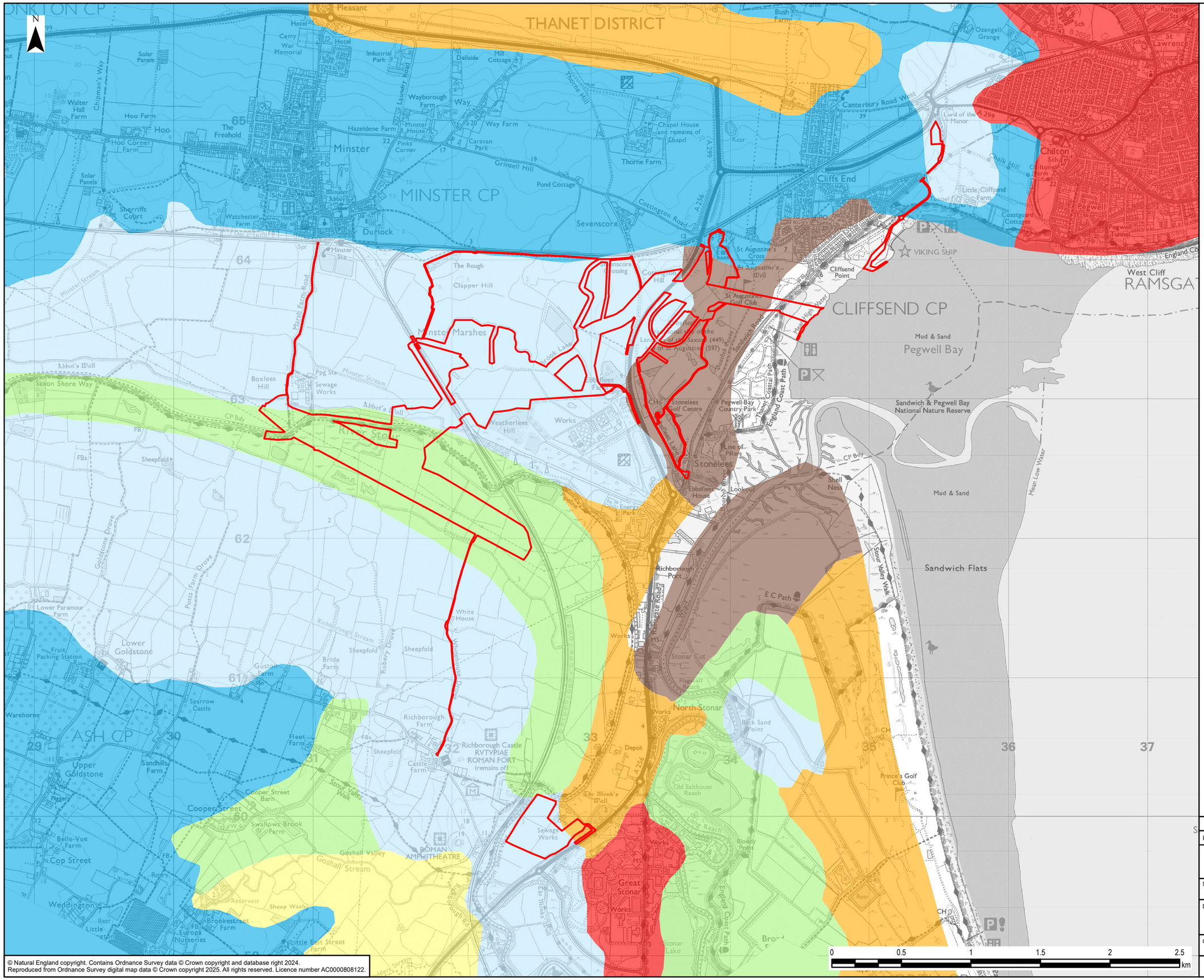
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Legend

- Kent Onshore Scheme Boundary

Agricultural Land Classification

- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non Agricultural
- Urban

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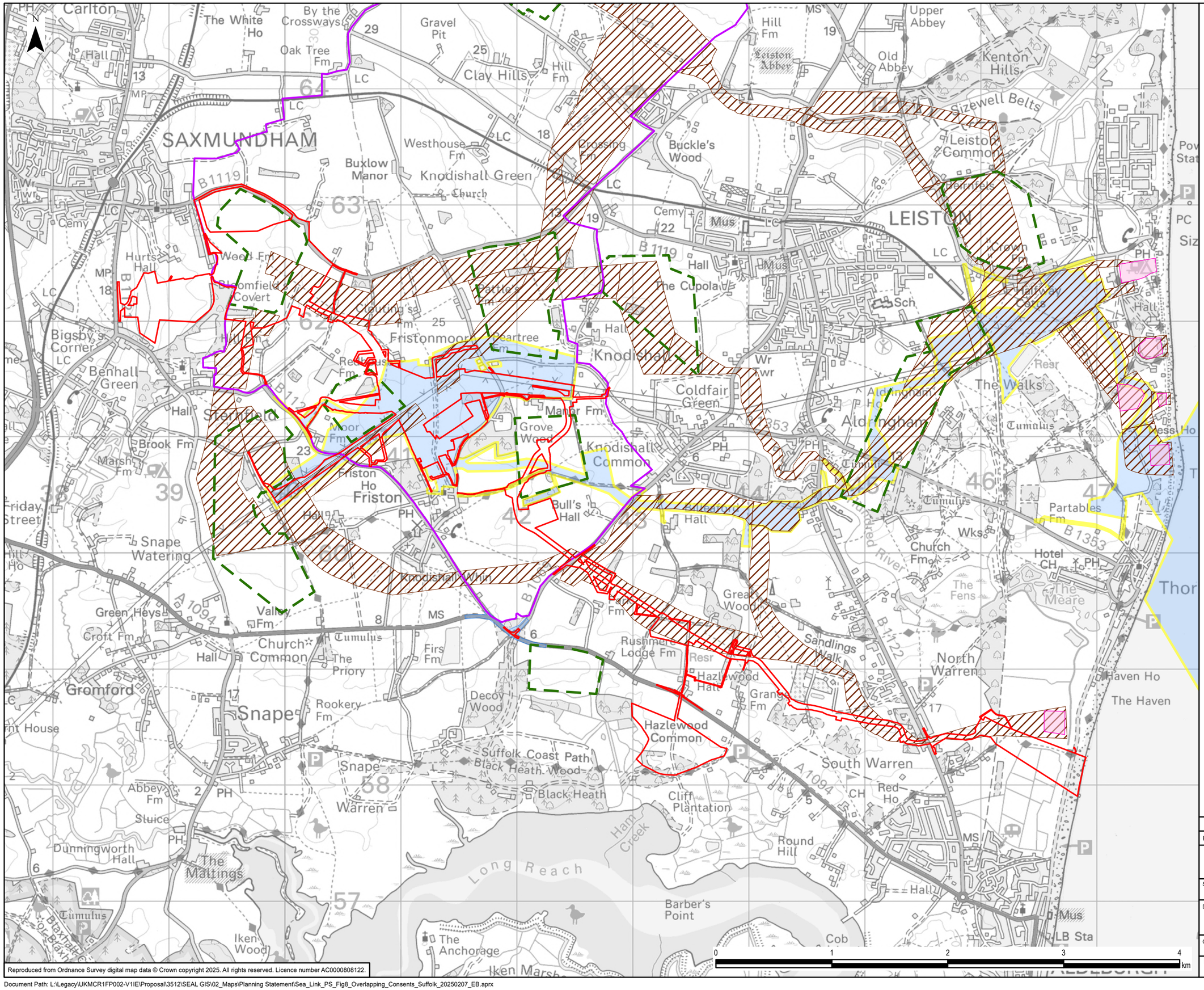
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Legend

- Suffolk Onshore Scheme Boundary

Overlapping Consents

- East Anglia ONE North Offshore Windfarm
- East Anglia TWO Offshore Windfarm
- LionLink
- Nautilus Routeing Options[1]
- Nautilus Converter Station Search Areas[1]
- Nautilus Landfall Siting[1]

1: It is anticipated that the Nautilus project will connect into the transmission network at the Isle of Grain, albeit that the connection agreement to connect to the national electricity grid at National Grid Friston Substation remains extant

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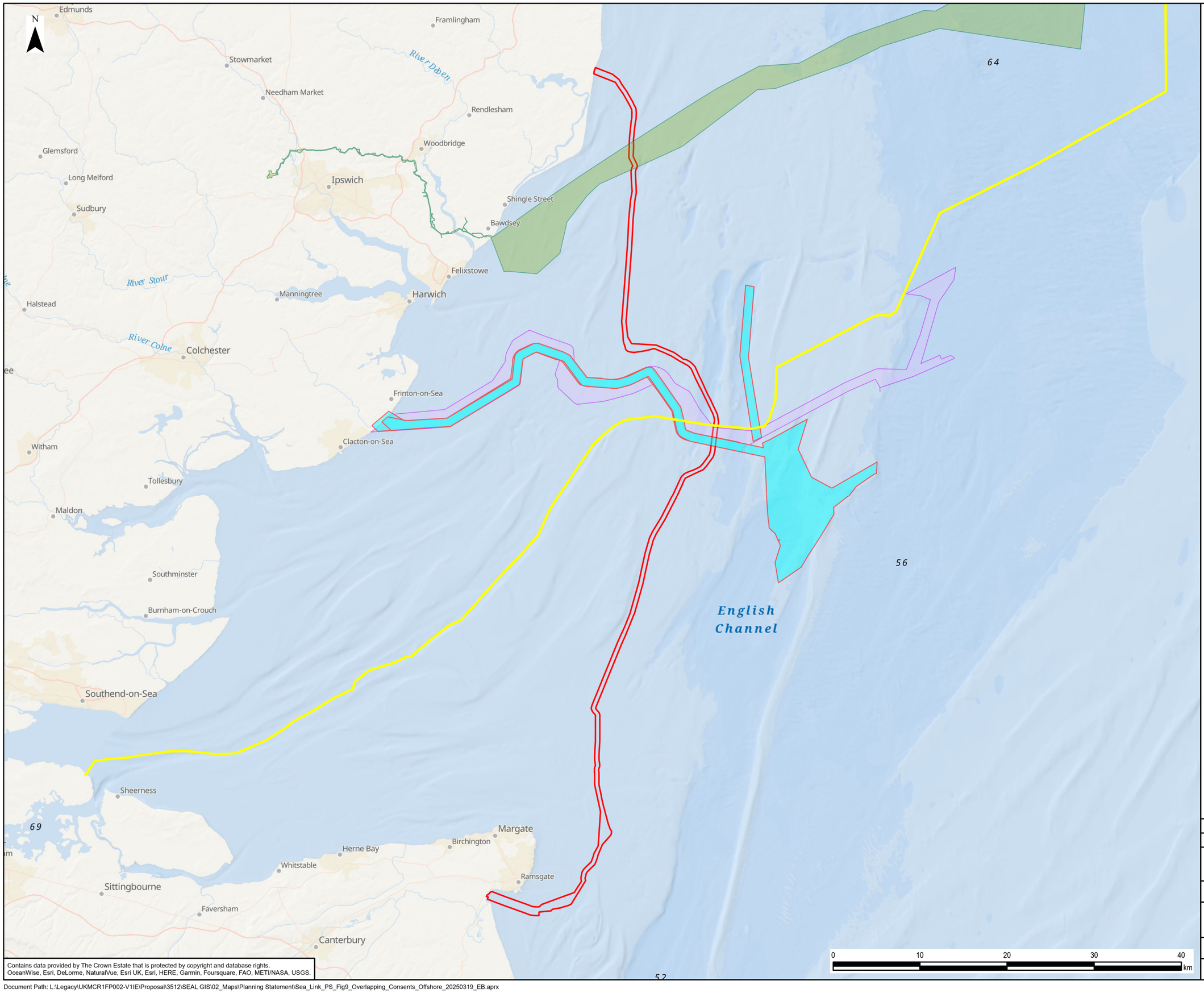
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- Offshore Scheme Boundary

Overlapping Consents

- NeuConnect
- East Anglia THREE Offshore Windfarm
- Five Estuaries Offshore Windfarm
- North Falls Offshore Windfarm

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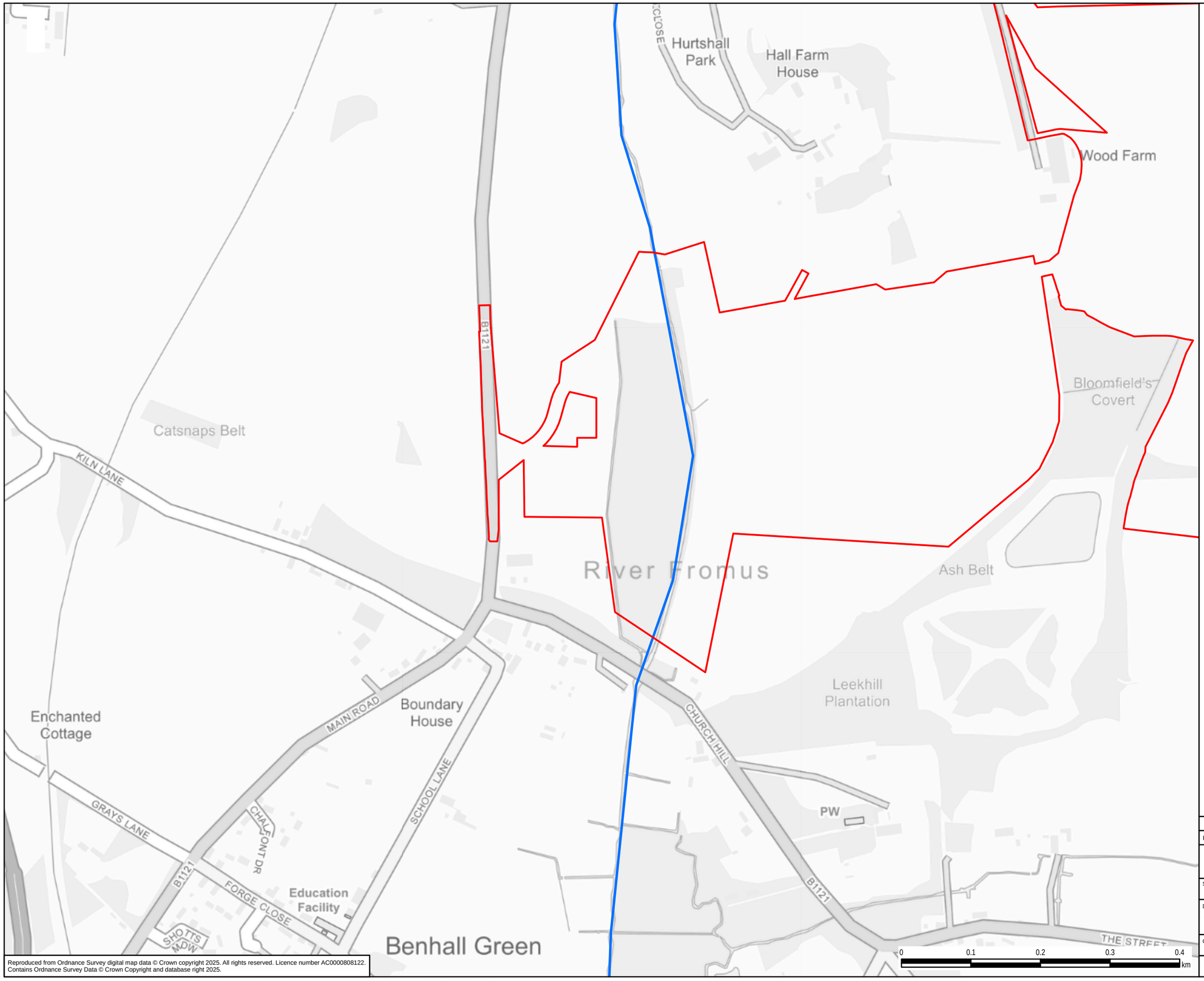
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Legend

- Suffolk Onshore Scheme Boundary
- River Fromus

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Scheme: SEA LINK

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- Suffolk Onshore Scheme Boundary
- Aldeburgh Beach

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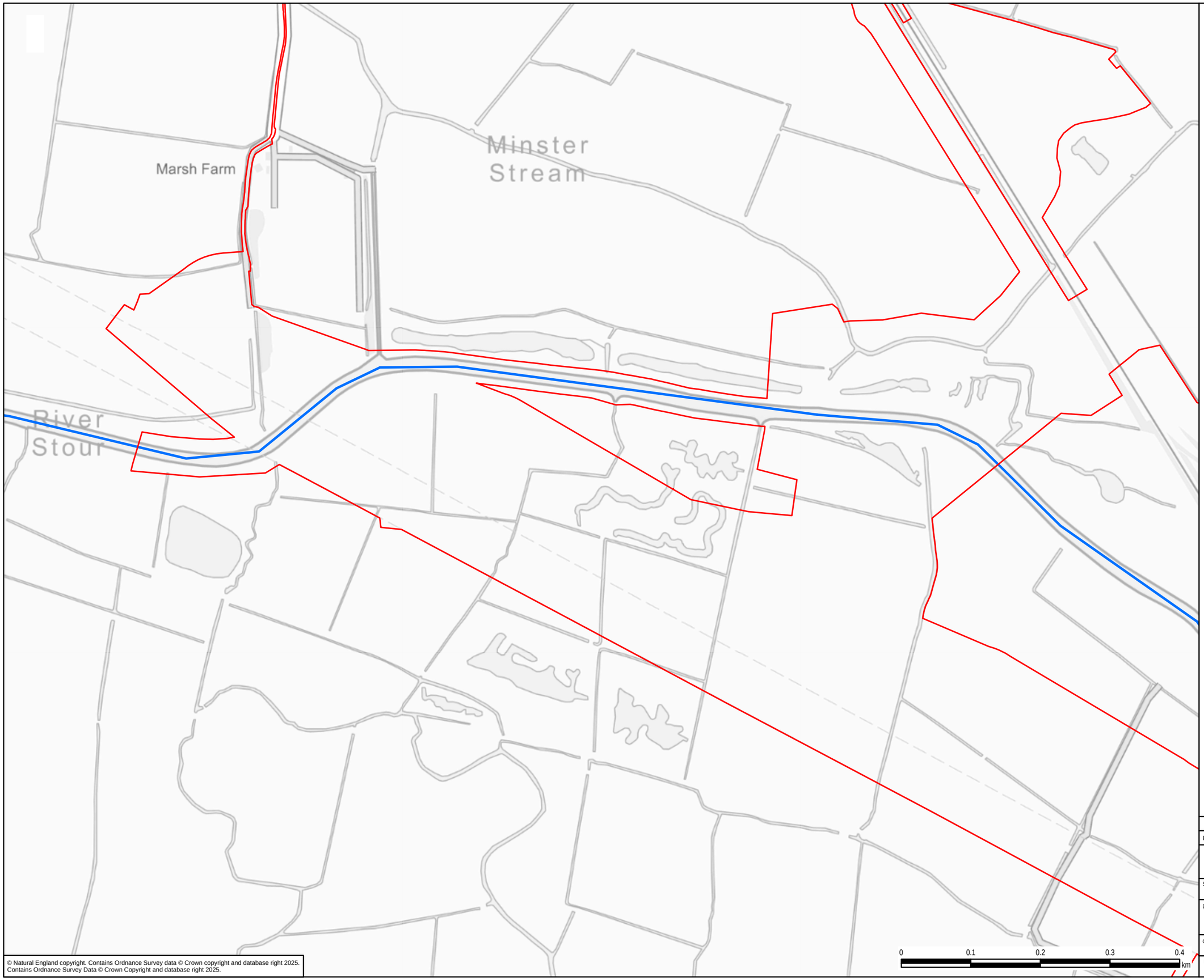
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Legend

- Kent Onshore Scheme Boundary
- River Stour

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Scheme: SEA LINK

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Legend

- Kent Onshore Scheme Boundary
- Pegwell Bay Country Park

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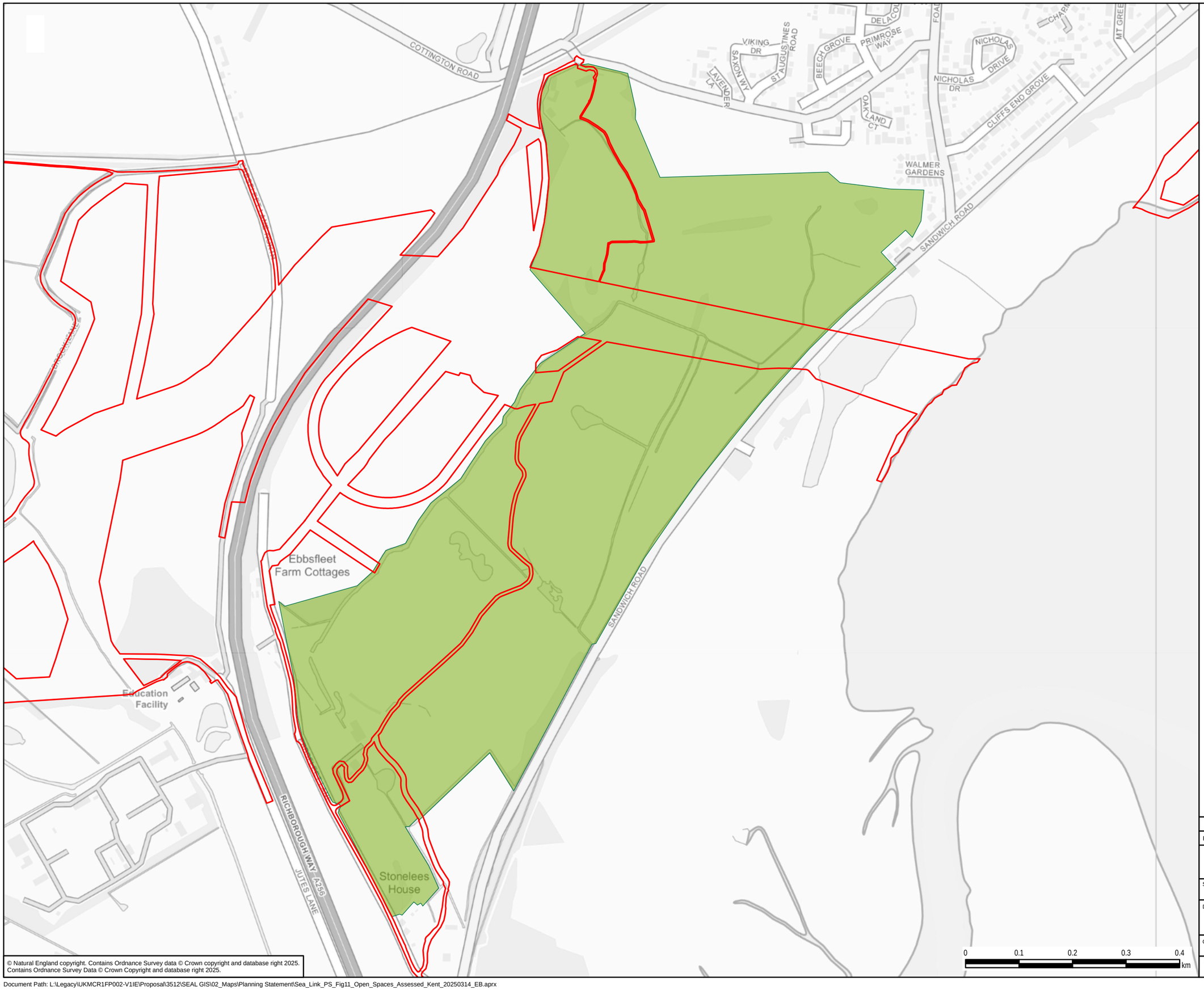
Scheme: SEA LINK

Document Title: OPEN SPACES ASSESSED FOR THE KENT ONSHORE SCHEME PEGWELL BAY COUNTRY PARK

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| Document Ref: | Scale: | Format: | Sheets: | Rev: |
|---|---|---|---|---|
| FIGURE 11 | 1:5,000 | A3 | 1 | 0 |

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Legend

- Kent Onshore Scheme Boundary
- St Augustine's Golf Course & Stonelees Golf Centre

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| Rev | Date | Description | GIS | Chk | App |
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| 0 | 14/03/2025 | PLANNING STATEMENT | EB | DF | SR |

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Scheme: SEA LINK

Document Title: OPEN SPACES ASSESSED FOR THE KENT ONSHORE SCHEME ST AUGUSTINE'S GOLF COURSE AND STONELEES GOLF CENTRE

| Creator: | Date: | Checker: | Date: | Approver: | Date: |
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| EB | 14/03/2025 | DF | 14/03/2025 | SR | 14/03/2025 |

| Document Ref: | Scale: | Format: | Sheets: | Rev: |
|---|---|---|---|---|
| FIGURE 11 | 1:6,500 | A3 | 1 | 0 |

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# Appendix F AONB Special Qualities Assessment

## Appendix Table F.1 AONB Special Qualitities Assessment

| Special Quality Indicator | Magnitude of Effect | Significance of Effect |
|---|---|---|
| | Construction<br>Ecosystem services: The construction of the Proposed Project will result in disturbance of land and therefore loss of stored carbon in soil and vegetation. However, this effect will be limited and will not significantly affect the landscape's delivery of regulating ecosystem services in terms of regulating climate, carbon storage, and resilience to climate change risks.<br>Magnitude for ecosystem services: **Small** | Effect for ecosystem services: **Minor adverse (not significant)** |
| | Operation and Maintenance (Year 1)<br>Ecosystem services: The operation of the Proposed Development will not cause significant losses in carbon stored in soil and vegetation, or alter the area's resilience to climate change risks. Therefore, there will be a negligible effect on the landscape's delivery of regulating ecosystem services in terms of regulating climate, carbon storage, and resilience to climate change risks.<br>Magnitude for ecosystem services: **Negligible** | Effect for ecosystem services:<br>**Negligible adverse (not significant)** |
| | Operation and Maintenance (Year 15)<br>Ecosystem services: The operation of the Proposed Development will not cause significant losses in carbon stored in soil and vegetation, or alter the area's resilience to climate change risks. Therefore, there will be a negligible effect on the landscape's delivery of regulating ecosystem services in terms of regulating climate, carbon storage, and resilience to climate change risks.<br>Magnitude for ecosystem services: **Negligible** | Effect for ecosystem services:<br>**Negligible adverse (not significant)** |

| | | |
|---|---|---|
| Health and Wellbeing | Construction<br>Construction activities of the Proposed Project may intersect, or otherwise impact upon, the accessibility of open space in the study area, which could impact the health and wellbeing of local residents. As set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**, the likely effect on health and wellbeing arising from access to open space during the construction phase is assessed to be small.<br><br>Magnitude for health and wellbeing: **Small** | Effect for community: **Minor adverse (not significant)** |
| | Operation<br>Operational and maintenance activities of the Proposed Project may intersect, or otherwise impact upon, the accessibility of open space in the study area, which could impact the health and wellbeing of local residents. As set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing,** given the limited impacts expected of which the severity would only result in little to no change in quality of life regarding access to open space, the likely effect on health and wellbeing arising from access to open space during the operation and maintenance phase is assessed to be small.<br>Magnitude for health and wellbeing: **Small** | Effect for community: **Minor adverse (not significant)** |
| Community | Construction<br>Roads bordering the Suffolk Onshore Scheme may be used by construction traffic which could increase traffic and community severance between neighbourhoods. This could reduce access to neighbourhood community facilities and in turn, reduce social cohesion. Additionally, impacts on landscape and visual amenity arising from the Proposed Project, during construction, could have an impact on residents' mental health. This could be linked to pride around their local area and uncertainty surrounding the Suffolk Onshore Scheme and the impacts it would have visually. As set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**, | Effect for community: **Minor adverse (not significant)** |

| | | |
|---|---|---|
| | the likely effect on health and wellbeing arising from social cohesion and community identity impacts during the construction phase is assessed to be small. As a result the construction of the Proposed Project is unlikely to induce an effect on the relationship between place and people.<br><br>Magnitude for community: **Small** | |
| | <u>Operation and Maintenance</u><br>As set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing,** in terms of any adverse impact on social cohesion and community identity, sense of belonging and sense of control for the local population, once operational, the likely effect of the proposed Project on health and wellbeing is assessed to be small. As a result the operation and maintenance of the Proposed Project is unlikely to induce an effect on the relationship between place and people.<br><br>Magnitude for community: **Small** | Effect for community: **Minor adverse (not significant)** |
| Economy | <u>Construction</u><br>The natural landscape is a valued asset attributed to supporting the local visitor economy in East Suffolk. The construction of the Proposed Project has the potential to lead to land use and severance impacts on PRoW, recreational routes, open spaces, and tourism assets. As set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism**, the construction of the Proposed Project will cross a number of PRoW and recreational routes. All PRoW and recreational routes will remain open and receive appropriate mitigation to ensure priority is given to the PRoW and its users and mitigate journey disruption. Additionally, the construction of the Proposed Project is not anticipated to lead to any significant effects on open spaces and tourism assets. Therefore, there will be a small impact on landscape and the community's ability to form an important part of the local economy during construction. | Effect for economy: **Minor adverse (not significant)** |

| | | |
|---|---|---|
| | Magnitude for economy: **Small** | |
| | Operation<br>The operation of the Proposed Development will not lead to any significant land take or severance impacts on local businesses, open spaces and tourism and recreation assets. There will be negligible PRoW effects during operation, however appropriate measures will be installed to ensure priority is given to the PRoW and its users and mitigate journey disruption. Therefore, there will be a negligible impact on landscape and the community's ability to form an important part of the local economy during operation.<br><br>Magnitude for economy: **Negligible** | Effect for economy: **Negligible adverse (not significant)** |

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